

IPSWICH BOROUGH COUNCIL

**PROPOSED SUBMISSION CORE  
STRATEGY AND POLICIES DEVELOPMENT  
PLAN DOCUMENT REVIEW**

**PRE-SUBMISSION MAIN MODIFICATIONS**



**IPSWICH**  
BOROUGH COUNCIL

SEPTEMBER 2015  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

**Ipswich Borough Council Local Plan  
Planning and Compulsory Purchase Act 2004  
Town & Country Planning (Local Planning) (England) Regulations 2012 (Regs 19 & 20)**

**Notice of Consultation**

- (1) Proposed Submission Core Strategy and Policies Development Plan Document (DPD) Review – Pre-Submission Main Modifications**
- (2) Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission Main Modifications**

Ipswich Borough Council hereby gives notice of its consultation on the Pre-Submission Main Modifications to the Core Strategy and Policies Development Plan Document (DPD) Review and Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD. The consultation period will commence at 9am on Friday 9<sup>th</sup> October 2015 and conclude at 11:45pm on Monday 23<sup>rd</sup> November 2015. The Council is inviting representations on the Pre-Submission Main Modifications and the Sustainability Appraisals and Habitats Regulations Assessments with addenda. Representations may only be made in writing and are encouraged via the Council's local plan consultation module on the website at [www.ipswich.gov.uk/consultations](http://www.ipswich.gov.uk/consultations). Forms are also available via the website and in paper copy at the drop-in exhibition and the locations listed below and can be e-mailed or posted to Planning and Development Business Support, at the address below, to reach us by **no later than 11:45pm on Monday 23<sup>rd</sup> November 2015**. Only representations received within this period have a statutory right to be considered by the Planning Inspector at a subsequent Examination in Public.

**Inspection of documents:**

The consultation documents will be available for inspection from Friday 9<sup>th</sup> October 2015 on the Council's website ([www.ipswich.gov.uk/consultations](http://www.ipswich.gov.uk/consultations)) and at the following locations:

- ❑ The **Customer Services Centre**, Town Hall, Cornhill, Ipswich (weekdays 8.30am to 5.30pm);
- ❑ The **Ipswich County Library**, Northgate Street, Ipswich (Mon, Weds, Thurs 9.00am to 6.00pm; Tues, Fri 9.00am to 7.00pm; Sat 8.30am to 5.00pm and Sun 10.00am to 4.00pm);
- ❑ **Branch libraries** across Ipswich (Chantry, Gainsborough open Mon-Sun various opening hours; Rosehill, Stoke, Broomhill open Tues-Sun various opening hours);
- ❑ **Grafton House Reception**, 15-17 Russell Road, Ipswich (Mon-Fri 8.30am to 5.00pm).

Copies of the consultation documents will be available free on CD, subject to availability, from the exhibitions or at Grafton House by request. Paper copies will be available at cost of printing plus P&P.

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- i) the submission of the local plan for independent examination under section 20 of the Act,
- ii) the publication of the recommendations of the person appointed to carry out an independent examination of the local plan under section 20 of the Act, and
- iii) the adoption of the local plan.

**Drop-in exhibition:**

Officers will be available to answer questions at the drop-in exhibition, which will be held on Saturday 7<sup>th</sup> November 2015 between 11am and 4pm in the Giles Room, Ipswich Town Hall.

Date of notice: October 2015

e-mail: [planningandregeneration@ipswich.gov.uk](mailto:planningandregeneration@ipswich.gov.uk)

Planning and Development  
Ipswich Borough Council  
Grafton House, Russell Road  
Ipswich IP1 2DE



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## Main Modifications for Public Consultation

Main Modifications are substantive changes, which alter the meaning of a policy or strategy (e.g. rewording policies to change their meaning, adding new sites or deleting existing ones). New text added is shown underlined, deleted text is shown ~~struck through~~.

Policy / paragraph	Main modification	Reason	Objector(s)
<b>CHAPTER 8</b>			
CS1 Sustainable Development – Climate Change	Amend i a) Requiring building and infrastructure design to incorporate water <del>conservation, capture, recycling and</del> efficiency measures and sustainable drainage systems (SuDS); and	For consistency with new optional requirement for water use which has been introduced through the Building Regulations.	Editorial update.
CS2 The Location and Nature of Development	Add reference to community development support to clause a.: a) Focusing new residential ... of the town's district centres, <u>and supporting community development</u> ;	To ensure that major developments, whether high or lower density schemes, provide support for community development to promote wellbeing and social inclusion.	Editorial update.
CS2 The Location and Nature of Development	Remove 'prior' from sentence relating to the sustainable urban extension (below clause h.): ... is planned subject to the <del>prior</del> -provision of ...	For consistency with CS10, Chapter 10 and the Ipswich Garden Suburb Supplementary Planning Document.	Editorial update.
CS4 Protecting our Assets	Set out a strategic approach to the historic environment:  Amend sentence 1: replace <del>historical</del> with <u>heritage</u>  Amend sentence three to read: "The Council will also conserve and enhance heritage assets within the Borough through its development management policies, <u>the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance, and taking steps to reduce the number of heritage assets at risk</u> ".	To fully reflect NPPF, and ensure that all aspects of the historic environment are addressed, as the draft policy only referred to conservation areas.	Historic England

<b>Policy / paragraph</b>	<b>Main modification</b>	<b>Reason</b>	<b>Objector(s)</b>
CS4 Protecting our Assets	Amend clause (a) to read ' <u>...sites, and protected and priority species;</u> '	To ensure compliance with the Biodiversity Duty.	Suffolk County Council
CS6 The Ipswich Policy Area	Amend final paragraph as follows: 'The preparation of joint or aligned development plan documents is to be explored <del>later in the plan period</del> , to ensure ...	To clarify that joint work would begin sooner within the plan period.	Home Builders' Federation
CS7 The Amount of Housing Required	Amend the figures in the policy and accompanying tables to reflect the updating of the baseline to 1 <sup>st</sup> April 2015:  '... The Council will allocate land to provide for at least an additional <del>5,434</del> <u>5,429</u> dwellings net in the Borough, with a lower amount of <del>4,734</del> <u>4,629</u> expected by 2031 to ...'  '... To meet the remaining requirement of <del>5,851</del> <u>5,578</u> dwellings to 2031, the Council ...'  Revised Tables 2, 3 and 4 are attached at the end of this schedule.  Make consequent amendments to explanatory text:  8.80 Table 2 shows that, as a result of housing completions between 2011 and <del>2014</del> <u>2015</u> , <del>13,004</del> <u>12,473</u> dwellings remain to be delivered between <del>2014</del> <u>2015</u> and 2031 in order to meet the requirement.  8.81 ... are capable of delivering the housing requirement in the ten years to <del>2024</del> <u>2025</u> . The ...	To ensure that the plan submitted is up to date.	Editorial
CS10 Ipswich Garden Suburb	Amendments to reflect the current position:  'The site, identified on the policies map, consists of 195ha of land which will be developed <u>comprehensively</u> as a garden	To align closely with the Ipswich Garden Suburb SPD and ensure that development follows the guidance set out within it.	Editorial update. Also Crest Strategic,

Policy / paragraph	Main modification	Reason	Objector(s)
	<p>suburb ...'</p> <p><del>'A prerequisite for any development being granted planning permission in the garden Suburb will be the preparation by the Council of a supplementary planning document providing a development brief to:</del></p> <p><u>A supplementary planning document has been prepared to:</u></p> <ul style="list-style-type: none"> <li>a. guide ...</li> <li>b. amplify ...</li> <li>c. etc.</li> </ul> <p><u>Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD.'</u></p>		Ipswich Society, Ben Gummer MP
CS10 Ipswich Garden Suburb/paragraph 8.108	<p>Insert new text to paragraph 8.108:</p> <p>'The infrastructure requirements at the Garden Suburb will be significant and include new roads ecological networks and green corridors, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities. This infrastructure can also deliver benefits to the existing communities in the area and help to sustain them. <u>A comprehensive and coordinated approach to the development of the Garden Suburb is required to ensure the proper planning and delivery of this infrastructure. The Council will consider using its compulsory purchase powers, where necessary, to enable comprehensive development and infrastructure delivery to take place.</u> The detailed infrastructure requirements of the development of approximately 3,500</p>	To clarify the Council's options in relation to ensuring the Garden Suburb is delivered.	Editorial update

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	<p>dwelling at the Garden Suburb and trigger points for the delivery of the items of infrastructure are identified in Table 8B in Chapter 10 of the Core Strategy. Prior to development on the Ipswich School Playing Fields site, replacement sports facilities will be required to be first provided in accordance with policy DM28. The site for replacement playing fields is allocated to the west of Tuddenham Road and north of the railway line.'</p>		
<p>CS11 Gypsy and Traveller Accommodation</p>	<p>Amend clause (a) to 'where possible preferably, within 1km of basic services including the public transport network.'</p> <p>Add in clauses a) to c) of Site Allocations Policy SP4:</p> <p>'Provision will be found within the Ipswich Policy Area for additional permanent pitches to meet the need as identified through the Gypsy and Travellers Accommodation Assessment.</p> <p><u>Applications for the provision of permanent pitches will be considered against the following criteria:</u></p> <ul style="list-style-type: none"> <li>a) <u>The existing level of local provision and need for sites;</u></li> <li>b) <u>The availability (or lack) of alternative accommodation for the applicants; and</u></li> <li>c) <u>Other personal circumstances of the applicant, including the proposed occupants, must meet the definition of Gypsy or Traveller.</u></li> </ul> <p>Sites for additional ...'</p>	<p>To address concern that if this were not possible a site could still be acceptable.</p> <p>To avoid confusion from having two policies in two plans.</p>	<p>National Federation of Gypsy Liaison Groups</p> <p>Editorial update</p>

Policy / paragraph	Main modification	Reason	Objector(s)
CS13 Planning for jobs growth	<p>Amend to clarify that the job figure relates to the Borough:</p> <p><del>‘It will encourage the provision of in the region of approximately 12,500 jobs in the Borough between 2011 and 2031...’</del></p>	For clarity and to respond to comments which suggested it is not clear which geographic area the jobs figure relates to.	Editorial update and Northern Fringe Protection Group and others
CS17 Infrastructure	<p>Amend policy to clarify that the direct provision of infrastructure by developers is allowed as mitigation for impacts (as an alternative to a commuted sum or CIL payment only). Add the following to the end of paragraph 2: <u>‘...CIL charge, or other mechanism as agreed with the Council.’</u></p> <p>Add to end of policy <u>‘The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment can be addressed, including for any measures not classified as infrastructure.’</u></p>	<p>For clarity and to ensure infrastructure is provided.</p> <p>To ensure that CS17 would enable contributions for HRA mitigation measures, including those that might not be classed as infrastructure, to be secured.</p>	<p>NHS England</p> <p>Editorial Update</p>
CS17 / new 8.183	<p>Insert new paragraph 8.183 relating to the above: <u>‘The Habitats Regulations Assessment identifies a range of measures to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough are mitigated. This relates to mitigating the cumulative effect of housing growth across Ipswich Borough, in combination with housing growth in Suffolk Coastal district. The measures include the provision of the Country Park or similar high quality provision to the north of Ipswich, delivering parts b, d, e, g and h of policy CS16, production and implementation of visitor management plans at key sites and a monitoring programme to assess visitor impact over time. The Council is considering the production of a mitigation strategy which would specify the measures</u></p>	To explain the reason for specific reference to HRA mitigation in the policy.	Editorial update

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CS20 Key Transport Proposals	<p><u>required and how these should be delivered and funded.'</u></p> <p>Amend policy to add reference to proposals in policy SP15 of Site Allocations DPD:  <u>'The Council will support further measures to facilitate cycling and walking in the Borough, as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.'</u></p> <p>Add explanatory text to paragraph 8.208</p> <p>'Detailed proposals, including those for the Star Lane gyratory <u>and additional infrastructure for pedestrians and cyclists</u>, are included in ...'</p>	For clarity and completeness.	Ipswich Society
<b>CHAPTER 9</b>			
DM1 Sustainable Design and Construction	<p>Amend to reflect Government's position on Code for Sustainable Homes, zero carbon dwellings and allowable solutions as follows:</p> <p>New development shall be required to achieve a high standard of environmental sustainability. This will be achieved by the following standards:</p> <p><del>a. New build residential development should achieve a minimum of Level 4 of the Code for Sustainable Homes standard or equivalent;</del></p> <p><u>a. New build residential development should achieve reductions in CO<sub>2</sub> emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L);</u></p> <p><u>b. New build residential development should meet water efficiency standards of 110 litres / person / day;</u></p>	<p>To reflect withdrawal of Code for Sustainable Homes, introduction of optional water standards and powers for requiring energy efficiency standards (see Ministerial Statement March 2015).</p> <p>To also reflect the Government's statement contained within the Fixing the Foundations paper (HM Treasury, July 2015) which states that:  'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings</p>	Editorial update (also CBRE)



Policy / paragraph	Main modification	Reason	Objector(s)
	<p><del>b</del>c. Conversions and changes of use of existing buildings providing new residential dwellings should achieve a minimum of BREEAM Domestic Refurbishment Very Good standard or equivalent;</p> <p><del>e</del>d. New build non-residential development of 500m<sup>2</sup> and above for the whole development should achieve a minimum of BREEAM Very Good standard or equivalent;</p> <p><del>e</del>e. Conversions and changes of use to non-residential uses with an internal floor area of 500m<sup>2</sup> and above should achieve a minimum of BREEAM Very Good standard or equivalent.</p> <p>9.5 The National Planning Policy Framework sets out how local planning can best support the achievement of sustainable development. Specifically it requires that local planning authorities plan with a presumption in favour of sustainable development. The aim of local planning authorities should be to adopt proactive strategies to mitigate and adapt to climate change and a move towards a low carbon future. <u>The National Planning Policy Framework states that when setting local requirements for a building's sustainability, local authorities should do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards. The Government has further reiterated its commitment to reducing carbon emissions from new development, and that all new homes will be required to be zero carbon from 2016 through its current Housing Standards Review and also proposes requiring non-residential developments to be zero carbon from 2019. Under the 2008 Planning and Energy Act local planning authorities may require development in their area to comply with energy efficiency standards that exceed the energy</u></p>	<p>should be allowed time to become established.'</p> <p>Note: The Planning and Energy Act 2008 allows planning authorities to require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations (Section 1(c)). Regulation 43 of the Deregulation Act 2015 sets out a provision for this to not apply to residential development, however this requires commencement via secondary legislation which has so far not been put in place.</p>	

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	<p><u>requirements of building regulations. In accordance with the provisions of the March 2015 Ministerial Statement<sup>1</sup>, the Council will expect new build residential development to achieve a 19% improvement in energy efficiency over the 2013 Target Emission Rate. This is equivalent to meeting the energy requirements of level 4 of the withdrawn Code for Sustainable Homes.</u></p> <p><del>9.6 A zero carbon home, as currently defined through the zero carbon buildings programme, is one where there are no carbon emissions resulting from the regulated energy requirements of the home (i.e. heating, lighting, hot water and fixed appliances but not plug-in appliances). It is proposed that this can be achieved through fabric energy efficiency measures, on-site or off-site renewable or low carbon energy generation or through financial contributions to carbon abatement measures established as part of the 'allowable solutions' programme. It is intended that as part of this mix, all new homes must meet energy efficiency standards equivalent to at least Level 4 of the Code for Sustainable Homes, which will be regulated through amendments to the Building Regulations. These proposed amendments to the Building Regulations equate to reductions in carbon emissions of around 20% above current (2013) requirements. The Government had until recently been proposing to introduce zero carbon homes which would have been achieved through a requirement to meet level 4 of the Code for Sustainable Homes along with 'allowable solutions' (a range of measures including further fabric energy efficiency measures, on or off-site renewable/low carbon energy generation and/or financial contributions to carbon abatement measures). However, the Government has recently announced that it does not intend to proceed</del></p>		

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	<p><u>with the allowable solutions scheme or with the proposed increased energy efficiency requirement, but state that energy efficiency measures will be kept under review.</u><sup>2</sup></p> <p><del>9.7 The Code for Sustainable Homes (CfSH) sets out nine categories against which a home can be rated. Energy efficiency and water efficiency categories have their own minimum standards that must be achieved at every level of the CfSH, recognising their importance to the sustainability of any home. Other categories include better management of surface water run-off, waste management (including construction waste and encouraging household recycling), pollution and management of the home, all of which contribute to the sustainable performance of homes.</del></p> <p><del>9.8 The Council considers the CfSH to be a particularly appropriate tool to assess sustainability of new residential developments in that it is a nationally accredited system that considers a wide range of sustainability criteria in addition to energy and CO2 emissions, and in particular water use. Similar benefits apply to the use of the BREEAM system of assessment for multi-residential uses (e.g. care homes, sheltered housing, student accommodation) and for non-residential uses.</del></p> <p><del>9.9 Through the Housing Standards Review, referred to above, in addition to securing delivery of the zero carbon homes programme, the Government also intends to replace all elements of the Code for Sustainable Homes with updated Building Regulations and powers for planning authorities to require more stringent 'optional' requirements through planning policies where these can be justified on the basis of need. The optional requirements are proposed to cover the accessibility (for</del></p>		

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	<p>example for the elderly and disabled) and water efficiency. The Government is also proposing a nationally described space standard through the Housing Standards Review (as referred to alongside policy DM30).</p> <p>9.10 — Whilst it is clear that much of the drive for carbon reduction in new homes and non-domestic buildings will be handled under the Building Regulations, the Council nevertheless considers it appropriate to have a planning policy requiring new development to achieve sustainability improvements beyond the requirements of Building Regulations both to support the carbon reduction agenda and to ensure the achievement of a more holistic approach to sustainable development through the achievement of the much wider range of environmental and social benefits that these schemes provide for.</p> <p>9.11 The policy provides for some flexibility in exceptional circumstances where it can be clearly demonstrated that achieving the required <del>rating</del> <u>standard</u> for the type and scale of development in question would either be not feasible or not viable in the light of such considerations as site constraints, other planning requirements, other development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower CfSH or BREEAM rating <u>or lower energy efficiency standards</u> being achieved having regard to other merits of the scheme in terms of sustainability and urban design. Development will still need to meet the requirements of the Building Regulations in force at the time.</p> <p>9.13 <u>In relation to BREEAM requirements,</u> tThe policy will be implemented through a requirement for the submission of Design Stage Assessments and Post Construction Reviews, carried out by a qualified CfSH or</p>		

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	<p>BREEAM assessor (as appropriate), for all planning applications for qualifying development. It will be expected that planning applications also be accompanied by a sustainability statement that explains and illustrates how sustainability considerations have influenced scheme design.</p> <p><u>Through the Housing Standards Review the Government has introduced powers for planning authorities to require 'optional' standards for water efficiency. 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 optional requirement, which requires development to meet water efficiency standards of 110 litres/person/day (compared to Building Regulations requirements of 125 litres/person/day) is set out in Part G of the Building Regulations<sup>3</sup>.</u></p> <p>9.14 Where appropriate, mitigation measures shall be secured by condition to ensure that any pollution through air, noise, dust or vibration during the construction phase of development will not be detrimental to the amenity of neighbouring uses. Relevant policy guidance in respect of neighbouring amenity can be found in DM26.</p> <p><sup>1</sup> <u>Planning Update March 2015 (Ministerial Statement)</u></p> <p><sup>2</sup> <u>Fixing the Foundations – Creating a More Prosperous Nation (HM Treasury, July 2015)</u></p> <p><sup>3</sup> <u>2010 Building Regulations: Sanitation, Hot Water Safety and Water Efficiency – Approved Document (2015 Edition)</u></p> <p><sup>4</sup> <u>Housing Standards Review – Technical Consultation</u></p>		

Policy / paragraph	Main modification	Reason	Objector(s)
	<i>(Department for Communities and Local Government, 2014) Next steps to zero carbon homes — Allowable Solutions (Department for Communities and Local Government, 2014)</i>		
DM5 Design and Character	Amend Part e. of DM5 as follows: 'Protecting and enhancing the special character and distinctiveness of Ipswich, including significant views that are recognised as being important and worth protecting , <u>the setting of any nearby listed buildings</u> , and helping to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene'	For completeness.	Suffolk Preservation Society
DM5 Design and Character	Add to end of policy DM5: <u>In new residential development of 10 or more dwellings, 35% of new dwellings will be required to be built to Building Regulations standard M4(2). Where affordable housing is provided a proportion of dwellings are required to be built to Building Regulations standard M4(3) as part of the affordable housing provision. The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.</u>  The following text to be amended accordingly in 9.43: In an era of rapid social, economic, environmental and technological change, buildings need to be designed to be adaptable to respond in a sustainable manner to the changing needs of occupiers. This is the 'long-life, loose- fit' principle. <del>It could be achieved using the lifetime homes principle to ensure that homes can meet families' changing needs over time.</del> For commercial buildings, it could mean ensuring that a building designed as an office for one	To reflect the introduction of new optional standards for accessible and adaptable dwellings and wheelchair user dwellings.	Editorial update, CBRE

Policy / paragraph	Main modification	Reason	Objector(s)
	<p>organisation is physically capable of being subdivided, should future patterns of demand change.</p> <p>Insert new paragraphs after 9.43:  <u>In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings. These optional standards can only be required through a planning policy requirement. The national Planning Practice Guidance states that 'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.'</u></p> <p><u>The 2014 Suffolk Housing Survey indicates that 10% of Ipswich residents live in a home which has been adapted in some way for accessibility purposes. The results indicate that a further 3% of Ipswich residents currently require adaptations to their dwellings. Since 2007 almost 1,600 adaptations have been carried out on the Council's housing stock. The number and proportion of elderly residents in the Borough is predicted to increase over future years, potentially further increasing the need for dwellings to be accessible and adaptable.</u></p> <p>Delete:  9.51 ... <del>The Council also encourages new housing to be built to the Lifetime Homes standard, which makes it easier for people to remain in their own homes as their mobility needs change, through encouraging homes to be built in a</del></p>		

Policy / paragraph	Main modification	Reason	Objector(s)
	<del>way in which rooms can be used flexibly over time.</del>		
DM6 Tall Buildings	Amend clause j. to read: 'the effect of the building in terms of its silhouette and impact on strategic views, with particular reference to conservation areas, <u>listed buildings and other heritage assets</u> , and the wooded skyline visible from and towards central Ipswich.'	For clarity.	Historic England
DM8 Heritage Assets and Conservation	<p>Amend the policy as follows:</p> <p>Part a. <del>Listed Buildings</del> Re-label as <u>Designated and Undesignated Assets</u> Amend the first paragraph of Part a. to remove the word historical ('... adversely affect its <del>historical</del> significance.')</p> <p>Add a third paragraph to Part a. as follows: <u>The Council will resist the demolition or partial demolition of both designated and undesignated heritage assets as outlined in paragraph 133 of the National Planning Policy Framework.</u></p> <p>Add a fourth paragraph to Part a. as follows: <u>The Council will seek to preserve Scheduled Monuments, scheduled parks and gardens and other remains of national importance and their settings, in a manner appropriate to their significance.</u></p> <p>Part b Conservation Areas</p> <p>Amend point (i) of Part b. to read: <u>the building/structure does not make a positive contribution to the significance</u> of the conservation area.</p> <p>Part c. Archaeology</p>	To ensure the policy is effective and consistent with national policy.	Historic England  Suffolk County Council



Policy / paragraph	Main modification	Reason	Objector(s)
	<p><del>Within the Area of Archaeological Importance defined on the policies map, Development will not be permitted which may disturb remains below ground, unless the proposal is supported by an appropriate archaeological assessment of the archaeological significance of the site and, if necessary, a programme of archaeological work—<u>investigation</u> in accordance with that assessment.</del></p> <p>Planning permission will not be granted if the remains identified are of sufficient importance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.</p> <p><del>In all other circumstances where planning permission is to be granted, the Council may impose a condition allowing an appropriate contractor to monitor the works under archaeological supervision and control during the necessary stages of construction.</del></p> <p><del>In locations outside of the Area of Archaeological Importance, where it becomes apparent through a planning application that there is an overriding case for archaeological remains found to be preserved in situ, then the requirements for the above sites within the Area of Archaeological Importance will apply. Where <u>archaeological potential is identified but</u> there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to an appropriate programme of archaeological investigation, and recording <del>being undertaken prior to the commencement of development,</del> <u>reporting and archiving.</u></del></p> <p>Add a heading of <u>Climate Change</u> above the final policy paragraph.</p>		

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	<i>(See also minor changes to the explanatory text to DM8 in the additional modifications table.)</i>		
DM10 Protection of Trees and Hedgerows	Clarify that clause (b) relates to applications for works to trees through adding the following text: 'in relation to applications for works to trees, only granting...'	For clarity	CBRE
DM12 Extensions to Dwellinghouses and the Provision of Ancillary Buildings	Amend annex policy to be more explicit in relation to extensions:  ... development that would provide for a residential annex will <del>only</del> be permitted where this: e. <u>is an extension that</u> would be subordinate in scale to the main residence and capable of being integrated into the main dwellinghouse once the dependency need has ceased;	To clarify the policy.	Editorial update.
DM18 Car and Cycle Parking	Amend car parking policy to refer to adopted standards: The Council will require <del>minimum</del> <u>adopted</u> standards of ....	To reflect the Council's adoption on 10 <sup>th</sup> February 2015 of the Suffolk Guidance for Parking.	Editorial update.
DM20 The Central Shopping Area and DM21 District and Local Centres	Include reference to betting shops and payday loan shops alongside references to A2-A5:  '... A2-A5 uses, <u>betting shops and payday loan shops</u> will be ...'	Betting shops and payday loans shops were previously A2 and would have been included in calculations of A2-A5 frontage. They are now Sui Generis uses and need particular reference within the policy. This does not change the meaning of the policy at the time it was consulted upon.	Editorial update.
DM24 Affordable Housing	Amend clause a. as follows: a. Is designed and built to at least the same standard as the market housing, <del>including the appropriate level of the Code for Sustainable Homes at the time;</del>	To align with changes to the Code and Policy DM1.	Crest Strategic, CBRE
DM25 / 9.149	Add additional criteria to DM25 relating specifically to starter homes: <u>In the case of Starter Homes, these would only be permitted</u>	Whilst the Government has provided policy in the form of the Ministerial Statement dated 2 <sup>nd</sup> March 2015 and within the	Editorial update.

Policy / paragraph	Main modification	Reason	Objector(s)
	<p><u>where:</u></p> <ul style="list-style-type: none"> <li>a) <u>there is no demand for continued use of the site for employment or commercial purposes as demonstrated by a marketing programme;</u></li> <li>b) <u>where the site is allocated for employment or commercial uses it is demonstrated that there is no reasonable prospect of the site being used for the allocated use, or other uses as detailed under the terms of criteria a-e above, during the plan period; and</u></li> <li>c) <u>housing would be compatible with existing and planned surrounding uses.</u></li> </ul> <p>New paragraph for supporting text:  <u>On 2<sup>nd</sup> March 2015 the Government introduced its Starter Homes policy<sup>1</sup>. Under this policy opportunities should be sought for provision of starter homes on 'commercial and industrial land that is either underused or unviable in its current or former use, and which has not currently been identified for housing.' Updates to the Planning Practice Guidance identify the circumstances in which starter homes should be supported. However, for clarity of how this policy should operate alongside DM25, and to ensure consistency with the approach in both the National Planning Policy Framework and other policies of the Local Plan in relation to economic growth, it is considered appropriate to establish a clear set of criteria on how such applications will be considered.</u></p> <p><sup>1</sup> <u>Written statement to Parliament – Starter Homes (Department of Communities and Local Government, March 2015)</u></p>	<p>updated Planning Practice Guidance, it is considered important to include criteria within the Local Plan to ensure the policy does not undermine other policies within the Plan, particularly in relation to delivery of employment and commercial development. In particular, due to the constrained nature of the Borough boundary, the loss of employment land which has a prospect of being used for such purposes during the plan period would undermine the Council's efforts to meet the requirements of paragraph 20 of the NPPF which states 'To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century.' The proposed policy wording ensures the Council's approach to Starter Homes is in accordance with the economic policies of the NPPF as well as the Starter Homes policy.</p>	

Policy / paragraph	Main modification	Reason	Objector(s)
DM25 / 9.152	<p>Add to the end of 9.152:  <u>'Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.'</u></p>	<p>To ensure compliance with the Suffolk Minerals and Waste Plans.</p>	<p>Suffolk County Council.</p>
DM29 Provision of New Open Spaces, Sport and Recreation Facilities	<p>Re-write policy DM29 as follows:</p> <p><u>The Council will ensure that public open spaces and sport and recreation facilities are provided through new developments to meet the needs of their occupiers and, where appropriate, contributions are provided to strategic accessible natural greenspace.</u></p> <p><u>In all new residential developments of 15 dwellings or more (or on sites of 0.5ha or more), at least 10% of the site area, or 15% in high density residential developments, should consist of on-site green space that is usable by the public, which will contribute to meeting the overall requirement. Where possible, public green spaces should be well overlooked, and the provision within large-scale developments should be distributed throughout the site.</u></p> <p><u>These developments would also be expected to mitigate their own impact through the provision of the various open space and facility typologies identified in Appendix 6. Where applying the quantity standards based on a population forecast of the development would exceed the Council's minimum size threshold for the typology, there will be a presumption in favour of on-site provision. Where this is not practicable or the Council prefers enhancement opportunities at existing facilities, then an in lieu contribution to new or existing off-site provision should be secured through a planning obligation.</u></p> <p><u>Where the quantity standard for a typology would not meet</u></p>	<p>To ensure compliance with CIL Regulations 122-124, which came into force in April 2015.</p> <p>Also need to reflect possibility of securing developer funding for strategic accessible natural greenspace provision / green rim, including possibly outside Borough.</p>	<p>Editorial update.</p>

Policy / paragraph	Main modification	Reason	Objector(s)
	<p><u>the minimum size threshold, a qualitative assessment of existing provision within the Appendix 6 accessibility standard distance from the site (480m or 720m) should be made to determine whether an enhancement opportunity exists. Where a reasonable improvement can be identified, a contribution should be secured where this would be necessary to make the development acceptable.</u></p> <p><u>The effect of on-site provision or off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.</u></p> <p><u>One-for-one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on the overall requirement. In addition, standards for children’s and young people’s facilities will not be applied to elderly persons’ accommodation and nursing homes.</u></p> <p><u>For non-residential developments of 1,000 sq. m floorspace or more, the provision of or a contribution to public open spaces and outdoor sports facilities will be negotiated on a case-by-case basis.</u></p> <p>Re-write the reasoned justification as follows:</p> <p><u>9.172 The policy outlines that at least 10% of the site area of all qualifying developments must consist of public green space, which shall include soft landscaping and tree planting to facilitate sustainable urban drainage and enhance the climate change resilience, appearance and biodiversity</u></p>		

Policy / paragraph	Main modification	Reason	Objector(s)
	<p><u>value of the development. In high density residential developments (defined in Policy DM30), the green space requirement will be a minimum of 15% of the site area, to compensate for the more limited amenity space in these developments and to provide an attractive setting for the buildings. The 10%/15% requirement will also contribute to the amenity green space and/or natural and semi natural green space standards as outlined in Appendix 6. It is expected that amenity green spaces in particular would be located on generally flat land in order to maximise their use. Where provision is distributed throughout large-scale developments, it is important that it adequately meets the intended use.</u></p> <p><u>9.173 Where possible, green spaces should provide for wildlife habitats designed and located so as to create a link with existing ecological networks and/or green corridors, which may include the proposed green rim around Ipswich for sites on the edge of the Borough. All planting proposals should be accompanied by an appropriate management plan. Within IP-One, the provision of a public civic space may be considered in lieu of green space where this makes a positive contribution to the townscape.</u></p> <p><u>9.174 The policy makes provision for instances where it is not practicable to include a type of open space or facility on-site. This will include factors where its provision would compromise other standards in this Plan, such as meeting the density requirements of Policy DM30 or the minimum garden sizes of Policy DM3.</u></p> <p><u>New para: Accessible natural greenspace is defined by Natural England as places where human control and</u></p>		

Policy / paragraph	Main modification	Reason	Objector(s)
	<p><u>activities are not intensive so that a feeling of naturalness is allowed to predominate. There is no local standard for the provision of strategic accessible natural green space ('ANG') per person or dwelling. However, the mapping of existing provision against the 'Nature Nearby' standards has identified areas of deficit, particularly across north west Ipswich. The Council will aim to address these deficits where it can be achieved through also meeting the local standards for natural and semi-natural greenspace.</u></p> <p><u>9.175 The Council's Public Open Space Supplementary Planning Document (SPD) will provide guidance on population forecasts from new developments and outline the minimum size standard for each Appendix 6 typology. The document will also indicate per square metre capital and maintenance costs for each typology where these are to be provided and/or maintained by the Council, and to guide in lieu contributions for new off-site provision. Where a contribution is secured to enhance an existing area of open space or facility, this sum will be based on the works required and in proportion to the scale of the development.</u></p> <p><u>9.176 The quality standards for the various typologies are identified by the Ipswich Open Space, Sport and Recreation Study, Play Strategy, Allotment Strategy and Open Space and Biodiversity Policy/Strategy, and any subsequent updates to these. Furthermore, the need for formal sports provision is currently being updated by the production of the Indoor Sports Facility Strategy and the Playing Pitch Strategy.</u></p> <p><u>9.177 New commercial development may create a demand for amenity green space and/or sports facilities. Therefore,</u></p>		

Policy / paragraph	Main modification	Reason	Objector(s)
	<p><u>specific needs will be considered in the context of each application with the quantity standards in Appendix 6 applied on the basis of the total number of full-time equivalent employees.</u></p>		
<p>9.181 / 9.182 (DM30)</p>	<p>Amend to include new nationally described space standards:</p> <p><del>9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to exceed minimum floorspace areas used by the former English Partnerships in its own developments (Quality Standards 2007) (gross internal floor area).</del></p> <p><del>9.182 These are as follows;</del></p> <ul style="list-style-type: none"> <li><del>• at least 51 sq m for a 1 bed/2 person dwelling</del></li> <li><del>• at least 66 sq m for a 2 bed/3 person dwelling</del></li> <li><del>• at least 77 sq m for a 2 bed/4 person dwelling</del></li> <li><del>• at least 93 sq m for a 3 bed/5 person dwelling and</del></li> <li><del>• at least 106 sq m for a 4 bed/6 person dwelling.</del></li> </ul> <p><del>9.183 The Government, through the Housing Standards Review, is currently proposing a set of national space standards. In relation to the standards set out above these would generally require larger floor areas where two storey 1 or 2 bed dwellings are proposed and where three storey 3 or 4 bed dwellings are proposed and could become a requirement through the adoption of planning policy to that effect.</del></p> <p><u>9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a</u></p>	<p>Nationally described space standards were introduced in March 2015 and the recent update to the Planning Practice Guidance states that planning authorities should only refer to these.</p>	<p>Editorial update, CBRE</p>



Policy / paragraph	Main modification	Reason	Objector(s)
	<p><u>wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to meet the Nationally Described Space Standards as set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015).</u></p>		
DM31 / 9.187	<p>9.187....<u>'Assessments under the Habitats Directive have been undertaken in relation to the production of the Core Strategy and Policies DPD Review and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD. Mitigation measures have been identified and in some instances developer contributions may be sought in relation to these and/or additional mitigation measures identified through assessments at planning application stage.'</u></p>	<p>For clarification that, whilst not specified under CS17 other than in relation to the country park and strategic green infrastructure, developer funding may be sought to mitigate impact(s) upon European protected site(s).</p>	<p>Editorial update</p>
DM31 / 9.188 / 9.189	<p>Amend paragraph 4 of the policy:</p> <p><del>'The Council will seek to</del> <u>Development will be required to conserve and enhance the nature conservation...</u></p> <p><del>'...and County Geodiversity Sites identified on the policies map, and Suffolk Biodiversity Action Plan protected and priority species and habitats, by ...,'</del></p> <p>Add new sentence to the end <u>'Enhancements for protected sites and protected and priority species will be expected where possible.'</u></p> <p>Add to 9.188 <u>'Many species are protected through specific legislation including the Wildlife and Countryside Act 1981 (as amended). England's priority species and habitats are those which are included on the list produced under Section 41 of the Natural Environment and Rural Communities Act 2006. Suffolk's priority species and habitats are identified in</u></p>	<p>To comply with the Biodiversity Duty and for clarity.</p>	<p>Suffolk County Council</p>

Policy / paragraph	Main modification	Reason	Objector(s)
	<p><u>the Suffolk Biodiversity Action Plan.</u></p> <p>Add to 9.189:  <u>The British Standard Guidance 'Biodiversity: Code of Practice for Planning and Development (BS42020)' provides an approach to dealing with biodiversity issues in development.</u></p>		
DM32	Remove ' <del>to non-community uses</del> ' from paragraph 2.	Loss of one community use for another may still result in the loss of a valued facility.	Theatres Trust
DM33	<p>Amend 1<sup>st</sup> sentence of paragraph 4 as follows:  <del>'Within the defined green corridors, development will only be permitted where it would maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions.'</del>  <u>'Development within the green corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions'.</u></p>	To clarify that the policy does not imply that development within the corridors would not be supported.	CBRE
DM34 Countryside	<p>Amend reference to the AONB:  In the case of the AONB, major development will only be permitted in exceptional circumstances in accordance with NPPF paragraph 116. <u>The landscape and scenic beauty of the AONB should be conserved.</u></p> <p>Proposals for development in the countryside should:</p> <ol style="list-style-type: none"> <li>a. Maintain ...;</li> <li><del>b. Conserve the landscape and scenic beauty of the AONB;</del></li> </ol>	To ensure that development outside the AONB would not impact upon it.	Suffolk County Council.

Policy / paragraph	Main modification	Reason	Objector(s)
DM34 Countryside	<p>Amend clause f. 'f. In the case of new housing, be a dwelling: i) required for the efficient operation of an existing rural enterprise which cannot be met nearby; <u>ii) required to secure the future of a heritage asset; iii) which re-uses a disused building and enhances the immediate setting; or iv) of exceptional and innovative design.'</u></p> <p>Add additional sentence: <u>'Proposals for residential development of more than one dwelling would be considered in the context of criteria a to e above.'</u></p>	To fully reflect NPPF paragraph 55.	Gladman Developments

Tables 2, 3 and 4 in relation to main modifications to policy CS7 The Amount of New Housing Required

**TABLE 2 HOUSING LAND SUPPLY AND REQUIREMENT AT APRIL 2014**~~2015~~

		Number of dwellings	Discounted Numbers	Cumulative Numbers
1	Dwellings completed between 2011 and <del>2014</del> 2015	546 <u>1,077*</u>	-	546 <u>1,077</u>
2	Dwellings under construction	561 <u>704</u>	-	4,107 <u>1,781</u>

3	Dwellings with planning permission	1,496 <u>820</u>	1,346 <u>738</u>	2,453 <u>2,519</u>
4	Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	569 <u>916</u>	512 <u>824</u>	2,965 <u>3,343</u>
5	Number of dwellings required on new site allocations, in a broad location and on windfall sites to 2031	<del>10,585</del> <u>10,207</u>		13,550

#### TABLE NOTES

The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.

*Line 1: Actual numbers of dwellings built between 1<sup>st</sup> April 2011 and 31<sup>st</sup> March 20142015. \* Includes 120 Assisted Living dwellings.*

*Line 2: Dwellings under construction at 31<sup>st</sup> March 20142015 - assumed that all will be completed over the plan period.*

*Line 3: Other dwellings with planning permission at 31<sup>st</sup> March 20142015 - assumed that 10% of these will not be completed.*

*Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31<sup>st</sup> March 20142015 - assumed that 10% of these will not be completed.*

*Line 5: To reach the local target of 13,550 dwellings by 2031 together with windfall sites, further land will need to be allocated within the Borough, and other locations within the Ipswich Policy Area identified with neighbouring authorities later in the plan period, for at least ~~10,585~~10,207 new homes.*

**TABLE 3 ESTIMATED HOUSING DELIVERY FOR ~~2014~~2015-2031 EXCLUDING CURRENT PERMISSIONS AS AT 1<sup>ST</sup> APRIL ~~2014~~2015**

Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings 2015-2031
IP-One	100%	932 <u>1,122</u>
Rest of built up area	<del>70.1%</del> <u>75.2%</u>	1,002 (PDL: 702) <u>807 (PDL: 607)</u>
Ipswich Garden Suburb (see policy CS10)	0%	2,800 <u>2,700</u>
<b>Total 2015-2031 (excluding windfall and broad locations)</b>	<b><del>34.8%</del> <u>37.4%</u></b>	<b>4,734 (PDL: 1,634)</b> <b><u>4,629 (PDL: 1,729)</u></b>

Small windfall sites (fewer than 10 dwellings) 2016-2031	90%	900 (PDL: 810)
Large windfall sites (10 or more dwellings) 2021-2031	90%	900 (PDL: 810)
Residual need later in plan period	0%	4,051 <u>3,778</u>
<b>Total 2015-2031</b>	<b><del>30.7%</del> <u>32.8%</u></b>	<del>10,585 (PDL: 3,254)</del> <b><u>10,207 (PDL: 3,349)</u></b>

**TABLE 4 ESTIMATED HOUSING DELIVERY AND PREVIOUSLY DEVELOPED LAND (PDL) TRAJECTORY (INCLUDING SITES WITH PLANNING PERMISSION AND UNDER CONSTRUCTION BUT NOT INCLUDING WINDFALL SITES)**

Time period	2001- 2011	2011- <del>2014</del> <u>2015</u>	<del>2014</del> <u>2015</u> -2031
Housing Delivery	6,903	<del>546</del> <u>1,077*</u>	<del>7,153</del> <u>6,904</u>
PDL%	94.5%	<del>73%</del> <u>79%</u>	<del>53.9%</del> <u>52.3%</u>