

# **Final Draft Ipswich Local Plan Review – Core Strategy and Policies Development Plan Document**

## **Schedule of Proposed Main Modifications**

**July 2021**

# Schedule of Proposed Main Modifications – Core Strategy and Policies Development Plan Document Review

## Introduction

1. The Ipswich Borough Council Local Plan Review (the Plan) was submitted to the Secretary of State for independent examination on 10 June 2020. Planning Inspectors Karen Baker DipTP MA DipMP MRTPI and Mike Hayden BSc(Hons) DipTP MRTPI were appointed to undertake the Examination with a Public Hearing held between 24 November and 16 December 2020.
2. Following the close of the Examination Hearing, the Inspectors wrote to the Council on 10 March 2021 setting out their views on the next steps for the examination of the Plan. This includes consultation on the Main Modifications (MMs) identified by the Council and discussed during the hearing that are required to make the Plan legally compliant or sound.
3. The Council has prepared this schedule setting out the proposed MMs, which are now published for public consultation, along with an updated Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). The MMs are expressed in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text.
4. The Council has also prepared a draft Plan including the proposed MMs, and published this alongside the MMs for illustrative purposes only. If there are any differences or discrepancies between the draft Plan with MMs and this MMs schedule, it is the latter that takes precedence.
5. This consultation is not an opportunity to re-state previous representations, to raise new objections to matters not covered by the MMs, or to seek further changes to the Publication draft of the Plan. We are seeking your views on whether the MMs are legally compliant and/or sound. Guidance on what constitutes legal compliance and soundness is available [here](#).
6. All duly made representations will be recorded, made available to view on the Examination pages of the Council's website, and sent to the Inspectors for their consideration via the Programme Officer. The Inspectors anticipate that all issues arising from this consultation on the MMs will be considered through the written representations procedure. Exceptionally, however, the Inspectors may decide it is necessary to hold additional Hearing sessions in order to resolve or clarify any outstanding issues.
7. For clarity, MMs are proposed changes that would materially affect the policies in the Local Plan Review. This does not include 'Additional Modifications', sometimes referred to as 'minor modifications', which are concerned with grammatical, formatting and other non-material changes.
8. The Council has published separate schedules of Additional Modifications (AMs) to the Plan, and of proposed changes to the Policies Map, some of which are consequent on the MMs. To be clear, the AMs and changes to the Policies Map are outside the scope of the Examination and, therefore, do not form part of this consultation.

**Table 1 Proposed Main Modifications to the Core Strategy and Policies Development Plan Document of the Local Plan Review**

MM Ref	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Main Modification	Reason
MM1	4	Paragraph 1.2	<p>Amend paragraph 1.2 to read as follows:</p> <p>‘This document is the Core Strategy and Policies Development Plan Document for Ipswich. It forms part of the Ipswich Local Plan. It covers three areas of policy.</p> <ul style="list-style-type: none"> <li>• Firstly it sets out a strategic vision and objectives to guide the development of the town (Chapter 6);</li> <li>• Secondly it promotes the spatial strategy for the development of the town to 2036 through strategic policies (<u>ISPA1 – ISPA4 and CS1 – CS20</u>) within the context of the Ipswich Strategic Planning Area (Chapter 8); and</li> <li>• Thirdly, it provides a suite of policies to control, manage and guide development across the Borough (Chapter 9).’</li> </ul>	<p>In accordance with the requirement in paragraph 21 of the NPPF for plans to make explicit which policies are strategic policies.</p>
MM2	10	Paragraph 2.5	<p>Amend paragraph 2.5 to read as follows:</p> <p>‘The components of the Ipswich Local Plan are illustrated in Diagram 2. The adopted Local Plan <del>Proposals</del> <u>Policies</u> Map will remain extant until replaced through other development plan documents (DPDs) to be prepared as part of the Ipswich Local Plan. <u>At the time of preparing the Ipswich Local Plan Review, there are no made neighbourhood plans in the Borough.</u>’</p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</p>
MM3	30	Paragraph 6.8	<p>Amend paragraph 6.8, Objective 2 to read as follows:</p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to</p>

			<p>'2. GROWTH - At least (a) <del>8,010</del> <u>8,280</u> new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2018 and 2036 in a manner that addresses identified local housing needs and provides a decent home for everyone, with 31% at the Ipswich Garden Suburb, <u>30% at the northern end of Humber Doucy Lane</u> and 15% in the remainder of the Borough being affordable homes; and (b) approximately 9,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Strategic Planning Area between 2018 and 2036.'</p> <p>Amend paragraph 6.8, Objective 5 to read as follows:</p> <p>'5. AIR QUALITY <u>AND CLIMATE CHANGE</u> - Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.'</p> <p>Amend paragraph 6.8, Objective 10 to read as follows:</p> <p>'10. COMMUNITY FACILITIES AND INFRASTRUCTURE – To retain, <u>improve</u> and provide high quality and sustainable education <u>facilities</u>, health <u>facilities</u>, and sports <u>and cultural</u> facilities and other key elements of community infrastructure <u>in locations accessible by sustainable means and in time</u> to meet local demand.'</p>	ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date Standard Method calculation of housing need, and to ensure it is consistent with national policy in addressing climate change.
MM4	31	Paragraph 6.13	<p>Amend paragraph 6.13 to read as follows:</p> <p>'Much of the central area of Ipswich alongside the river is classified by the Environment Agency as Flood Risk Zones 2 and 3. National policy (National Planning Policy Framework) requires a sequential approach to the location of development such that Flood Zones 2 and 3 are avoided if there are viable alternatives. In exceptional circumstances 'more vulnerable' development, such as housing or education development in Flood Zones: 2 and 3 may be possible if 'within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and development is appropriately flood resilient and resistant; <u>the development incorporates sustainable drainage systems unless there is clear evidence that this would be inappropriate; including safe refuge, access and escape routes where required, and that</u> any residual risk can be safely managed; and <u>safe access and escape routes</u></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.

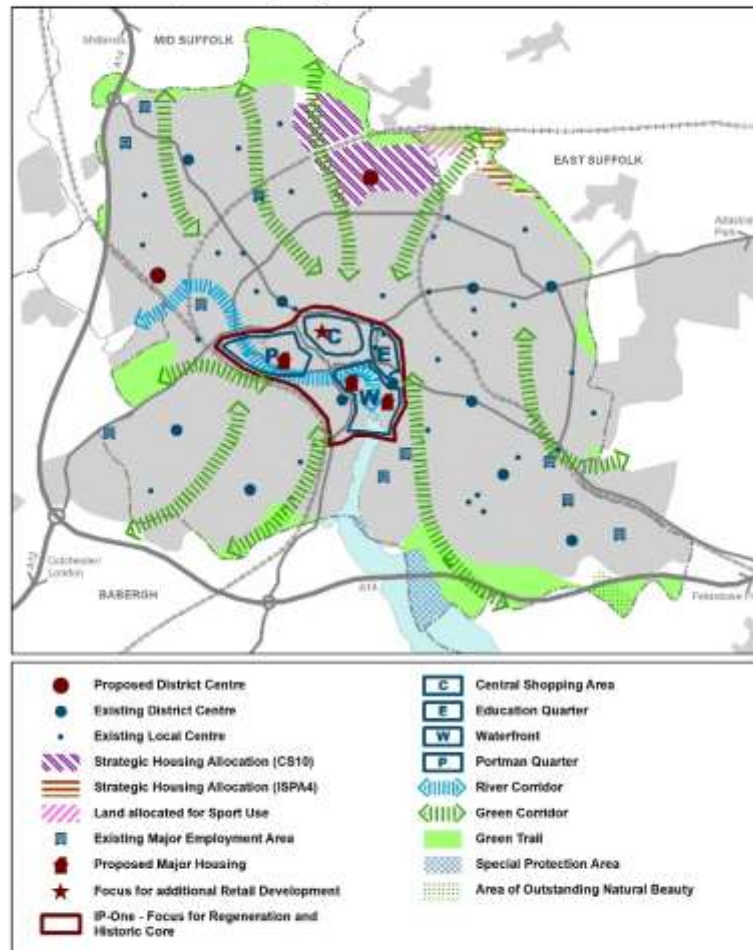
			are included where appropriate, as part of an agreed emergency plan. <del>including by emergency planning; and it gives priority to the use of sustainable drainage systems<sup>#1</sup> (the Exception Test).</del>	
MM5	32	Paragraph 6.16	<p>Amend paragraph 6.16 to read as follows:</p> <p>‘The flood defence strategy will reduce flood risk significantly. However, the residual risks resulting from the possibility of overtopping, breach or failure of gates or walls need to be considered. All development needs to be safe and when ‘more vulnerable’ developments need to be sited in Flood Zone 3a, they should pass the sequential and exception tests described in the NPPF. <u>‘An update of the Council’s Level 2 Strategic Flood Risk Assessment (SFRA) was revised-commenced in 2019. The SFRA is a living document which will be subject to periodic review and update to reflect new modelling data. An updated SFRA was published in October 2020 to reflect new River Gipping Model data. The SFRA provides guidance on residual tidal flood risk and actual fluvial flood risk in Ipswich both for the situation before and after completion of the flood barrier. The SFRA also suggests-a makes recommendations for the framework for safe development. The safety framework is detailed in the Council’s Development and Flood Risk SPD (September 2013, updated 2016) which is in the process of being to be updated again in response to the changes in flood risk information resulting from the Environment Agency’s Gipping Model and includes requirements for: ...’</u></p>	In accordance with paragraph 35 of the NPPF, to ensure the Plan is justified as an appropriate strategy based on proportionate evidence.
MM6	34	Paragraph 7.2	<p>Amend paragraph 7.2 to read as follows:</p> <p>‘The key diagram illustrates on a simple base map:</p> <ul style="list-style-type: none"> <li>(i) The IP-One Area Action Plan area and, within it, the Portman Quarter, Waterfront and Education Quarter (policy CS3);</li> <li>(ii) Key development locations identified including <u>the IP-One Area, the Central Shopping Area and the District and Local Centres (from policy CS2);</u></li> <li>(iii) The approach to Ipswich Garden Suburb as the location of development to 2036 (from policy CS10);</li> </ul>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.

<sup>#1</sup> National Planning Policy Framework

			<p>(iv) The cross-border allocation for future development, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, proposed at the northern end of Humber Doucy Lane through policy ISPA4; and</p> <p>(v) The ecological network, green corridor and green trail approach to strategic green infrastructure (policy CS16).</p>	
MM7	35	Diagram 3	<p>Amend Diagram 3: The Ipswich Key Diagram, to correctly show the Sproughton Road District Centre as 'proposed' rather than 'existing':</p>	<p>In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.</p>

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DIAGRAM 3: The Ipswich Key Diagram



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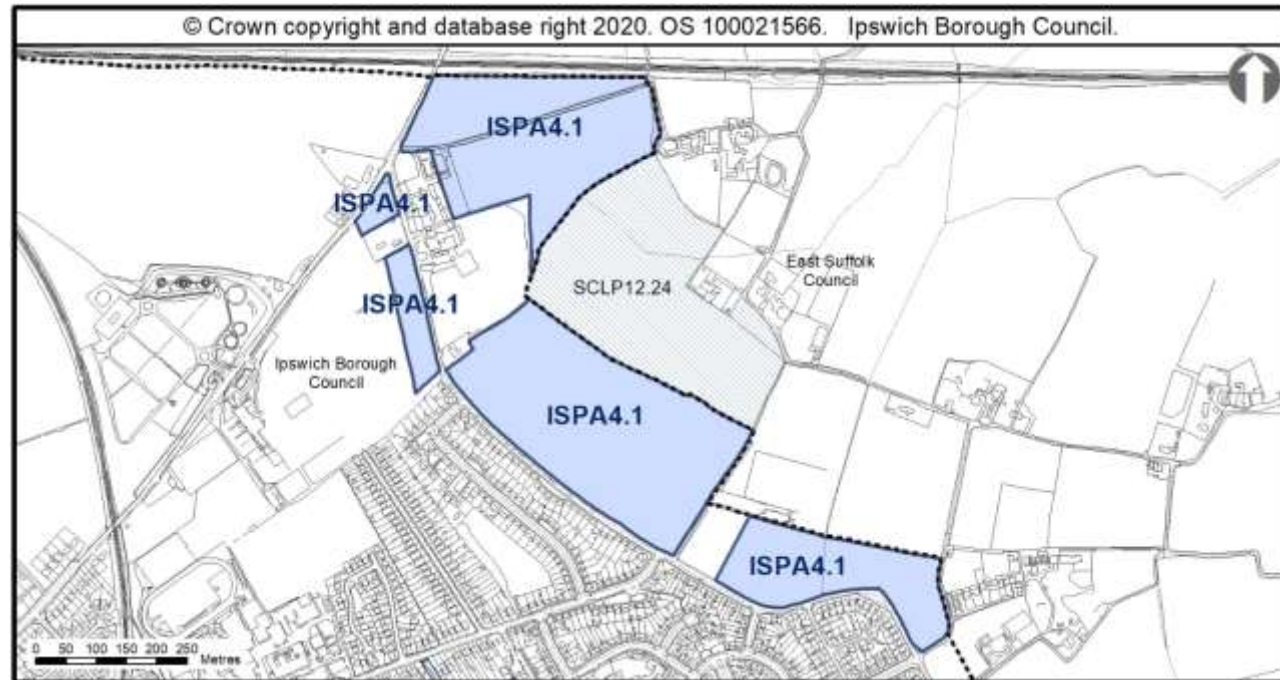
MM8	37	Paragraph 8.9	<p>Amend paragraph 8.9 to read as follows:</p> <p>‘On 24th July 2018, the Government published the revised National Planning Policy Framework. It introduces<u>d</u> a standard method for calculating housing need based on the latest published household projections and applying an uplift based upon published ratios of median house prices to median workplace earnings (the ‘affordability ratio’). This has since been updated in the February 2019 NPPF and the subsequent Planning Practice Guidance (PPG), ‘Housing and Economic Needs Assessment (22 July 2019) which provides detailed workings of the Government preferred method. However, using the current standard method and based on the household projections published by the Government in September 2019 and the affordability ratio published by the Office for National Statistics in <del>April 2019</del><u>March 2020</u>, the current figures equate to a need for <del>35,334</del> <u>34,200</u> dwellings across the Housing Market Area to reflect the housing figures as calculated using the 2014-based household projections and the <del>2018</del><u>2019</u> affordability ratio published in <del>March 2019</del><u>2020</u>. Table 8.1 below shows the figures and, for comparison purposes, the housing need as identified through the Government’s Right Homes, Right Places consultation in 2017.’</p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area’s objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.</p>
MM9	38	Table 8.1	<p>Amend Table 8.1 – Objectively Assessed Housing Need across the Ipswich Housing Market Area based on the standard method, as set out in Appendix 1 of this schedule.</p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area’s objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.</p>

MM10	39	Table 8.3	<p>Amend Table 8.3 to read as follows:</p> <p style="text-align: center;">Table 8.3 – Baseline jobs growth and employment land requirements in the ISPA</p> <table border="1" data-bbox="786 331 1823 595"> <thead> <tr> <th></th> <th>Baseline jobs growth (2018-2036)</th> <th>Minimum employment land requirements (B1-E(g), B2 and B8 uses) (2018 – 2036)</th> </tr> </thead> <tbody> <tr> <td>Babergh</td> <td>2,970</td> <td>2.3ha</td> </tr> <tr> <td>Ipswich</td> <td>9,500</td> <td>23.2ha</td> </tr> <tr> <td>Mid Suffolk</td> <td>5,270</td> <td>7.7ha</td> </tr> <tr> <td>Suffolk Coastal</td> <td>6,500</td> <td>11.7ha</td> </tr> <tr> <td>IFEA</td> <td>24,060</td> <td>44.9ha</td> </tr> </tbody> </table>		Baseline jobs growth (2018-2036)	Minimum employment land requirements (B1-E(g), B2 and B8 uses) (2018 – 2036)	Babergh	2,970	2.3ha	Ipswich	9,500	23.2ha	Mid Suffolk	5,270	7.7ha	Suffolk Coastal	6,500	11.7ha	IFEA	24,060	44.9ha	To reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
	Baseline jobs growth (2018-2036)	Minimum employment land requirements (B1-E(g), B2 and B8 uses) (2018 – 2036)																				
Babergh	2,970	2.3ha																				
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MM11	39	New Paragraph	<p>Insert a new paragraph after Table 8.3 to read as follows:</p> <p><u>‘In respect of the employment land requirement, the ESNA makes clear that the 23.2ha figure is the minimum quantum of land that should be planned for. Ipswich is identified as a ‘travel to work’ area and a key employment centre for the wider area. The importance of the Borough in supporting economic growth and productivity in the wider sub-region is reflected in the New Anglia Local Enterprise Partnership Norfolk and Suffolk Economic Strategy (2017) and the Suffolk Growth Framework (2019). The Employment Land Supply Assessment (ELSA) also recognised that higher levels of employment growth could be achieved and that there is a need to plan for a range and choice of sites to meet the needs of different potential employers. Therefore, through Policy CS13 a positive approach is taken to facilitating employment provision above the minimum identified requirement and the Site Allocations DPD allocates a quantum of land greater than the minimum requirement.’</u></p>	For soundness, to ensure the Plan is justified as an appropriate strategy in accordance with paragraph 35 of the NPPF.																		
MM12	39	Policy ISPA1	<p>Amend Policy ISPA1: Growth in the Ipswich Strategic Planning Area to read as follows:</p> <p><b>‘Policy ISPA1 Growth in the Ipswich Strategic Planning Area</b></p> <p><b>Ipswich will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area (ISPA), whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Ipswich Borough Council Local Plan will contribute to:</b></p> <p><b>a) The creation of at least 9,500 jobs through the provision of at least 23.2ha of employment land within Ipswich to contribute towards the Ipswich Functional</b></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area’s objectively																		

			<p><b>Economic Area;</b></p> <p><b>b) The collective delivery of at least <del>35,334</del> <u>34,200</u> dwellings across the Ipswich Housing Market Area 2018-36; and</b></p> <p><b>c) Supporting the continued role of Ipswich as County Town.</b></p> <p><b>The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.'</b></p>	assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.
MM13	40	Paragraph 8.19	<p>Amend Paragraph 8.19 to read as follows:</p> <p><del>'In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a <u>A</u> northern route around Ipswich <u>to assist</u> is expected to be needed to enable growth in the longer term, <u>remains an ambition of the Borough for the future.</u> The route would improve connectivity between the A14 and A12, reducing pressure on the A14 and improving network resilience, especially near the Orwell Bridge and Copdock interchange. Suffolk County Council consulted on Ipswich Northern Route Options between July to September 2019, which assessed three indicative broad routes. Ipswich Borough Council resolved at the Executive Committee meeting of 3 September 2019 to indicate a general support to the project from the Borough Council and to suggest a strong preference for the inner route. <u>This support remains.</u> The Council fully supports the ongoing work of Suffolk County Council in considering potential options for routes, and it is expected that the next review of the Ipswich Local Plan (along with other Local Plans in the Ipswich Strategic Planning Area) will consider the implications of any decisions made about routes in more detail, including the extent to which the options might support potential future scenarios for housing and employment growth beyond that which is being planned for within this Local Plan.'</del></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in respect of cross-boundary strategic matters and deliverable.
MM14	40	Policy ISPA2	<p>Amend Policy ISPA2: Strategic Infrastructure Priorities, to read as follows:</p> <p><b>'Policy ISPA2 Strategic Infrastructure Priorities</b></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is

			<p><b>The Council will work with partners such as the other local planning authorities in the ISPA, Suffolk County Council, Clinical Commissioning Groups, utilities companies, Highways England and Network Rail in supporting and enabling the delivery of key strategic infrastructure, and in particular the timely delivery of:</b></p> <p><b>a) A12 improvements;</b>  <b>b) A14 improvements;</b>  <b>c) Sustainable transport measures in Ipswich;</b>  <b>d) Improved cycle and walking routes;</b>  <b>e) Appropriate education provision to meet needs resulting from growth;</b>  <b>f) Appropriate health and leisure provision to meet needs resulting from growth;</b>  <b><u>g) Appropriate provisions to meet the needs of the police; community cohesion and community safety;</u></b>  <b><u>h) Green infrastructure and Suitable Alternative Natural Greenspace (SANG);</u></b>  <del>g) i) Improvements to water supply, foul sewerage and sewage treatment capacity; and</del>  <del>h) j) Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses.</del></p> <p><b>The Council also supports work to investigate <del>the feasibility of an Ipswich Northern Route and</del> the provision of increased capacity on railway lines for freight and passenger traffic, but these are not measures needed to enable the delivery of growth through this Local Plan.'</b></p>	<p>positively prepared and effective in providing for strategic infrastructure and cross boundary matters.</p>
MM15	40	Paragraph 8.21	<p>Amend paragraph 8.21 to read as follows:</p> <p><u>'Local authorities in the ISPA have been working collectively on the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), to mitigate the pressure caused by new developments on these designated sites. The partnership work, supported by Natural England, has established a strategy to mitigate the impacts and is due to be supported by a Supplementary Planning Document that will provide further details in respect of cost implications and subsequent implementation to identify European Sites and develop mitigation measures to counteract potential recreational impact upon them. This is supported by a Supplementary Planning Document, adopted by the Borough Council, that provides further details in respect of cost implications and subsequent implementation clarifying what is required from developers to mitigate any potential recreational impacts arising from their proposed new development.'</u></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for the Plan to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is</p>

				justified and effective.
MM16	41	Policy ISPA3	<p>Amend Policy ISPA3: Cross-boundary mitigation of effects on Protected Habitats and Species, to read as follows:</p> <p><b>'Policy ISPA3: Cross-boundary mitigation of effects on Protected Habitats and Species</b></p> <p><b>The Council will continue to work with other authorities to address the requirements of the <u>Recreational Disturbance Avoidance and Mitigation Strategy</u> and implementation of mitigation measures for the benefit of the European protected sites across the Ipswich Strategic Planning Area. The Council will continue to work with other authorities over the plan period to ensure that the strategy and mitigation measures are kept under review in partnership with Natural England and other stakeholders.'</b></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.
MM17	41	Policy ISPA4	<p>Amend Policy ISPA4: Cross Boundary Working to Deliver Sites, to read as follows, including site plan as modified, from Appendix 3 of the Site Allocations and Policies DPD:</p> <p><b>'<u>Policy ISPA4: Cross Boundary Working to Deliver Sites</u></b></p> <p><b>Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner.</b></p> <p><b><u>Land at the Northern end of Humber Doucy Lane (ISPA4.1)</u></b></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the policy is justified, effective in progressing a cross boundary strategic matter and consistent



**23.28ha of land comprising at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure in conjunction with land allocated in the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site. 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure.**

**In order to meet housing needs within the Borough boundary as far as possible, the Council identifies a cross border allocation for future development of 23.62ha of land within Ipswich Borough in 4 parcels forming ISPA4.1 for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. The allocation is shown on the accompanying site sheet for this policy. Development here will need to be appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure.**

with national policy.

		<p><del>It will require land and infrastructure works and green infrastructure (including Suitable Accessible Natural Greenspace) on both sides of the Borough boundary in order to come forward. Development would will be planned and comprehensively delivered comprehensively, and would be master planned through master planning of the site, including the allocated land in East Suffolk, to be undertaken jointly with land within East Suffolk Council and the landowner, as identified through the Suffolk Coastal Local Plan. Development will include at least 30% affordable housing provision. The percentage and mix will be determined through the master planning process, having regard to policies CS8 and CS12 and the Suffolk Coastal Area Local Plan affordable housing requirement applied to the portion of the site falling within East Suffolk. New homes would be limited to south of the railway line and adjacent to the urban area. The design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings. Infrastructure requirements would include the following but may include other infrastructure which will be determined as part of the joint master planning process: Development will be expected to comply with the following criteria:</del></p> <ul style="list-style-type: none"> <li>• <u>Delivery of a high-quality design in compliance with Policy DM12, including at least 30% affordable housing (unless viability assessment shows otherwise) in accordance with policies CS8 and CS12. The mix and tenure types of housing will be determined through the master planning process;</u></li> <li>• <u>Development must respect the maintenance of separation between Ipswich and surrounding settlements which is important to the character of the area. This should be achieved by the effective use of Green Infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk;</u></li> <li>• <u>The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced as part of any future development of the site. Development must also have regard to its impact on the significance of non-designated heritage assets identified in the Heritage Impact Assessment (HIA) (September 2020). An archaeological assessment is also required. Any future planning applications will require an HIA demonstrating how the effects on heritage assets are taken into account and mitigated;</u></li> <li>• <u>A site specific Flood Risk Assessment will be required;</u></li> </ul>	
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			<ul style="list-style-type: none"> <li>• <u>Rows of trees covered by Tree Preservation Orders (TPOs) along the boundary with Westerfield House should be preserved unless there are overriding reasons for their removal;</u></li>   <li>• <u>Current infrastructure requirements are as follows (subject to any additional infrastructure that may be identified as part of the planning application process);</u> <ul style="list-style-type: none"> <li>a. <u>Primary school places and an early years setting to meet the need created by the development;</u></li> <li>b. <u>Replacement sports facilities if required needed to comply with Policy DM5, other open space in compliance with the Council’s Open Space Standards set out in Appendix 5 of the Core Strategy DPD and links to the Ipswich ‘green trail’ walking and cycling route around the edge of Ipswich;</u></li> <li><del>c. A layout and design that incorporates which also contributes positively to to deliver benefits to both people and biodiversity and to help new developments deliver 10% biodiversity net gain; and</del></li> <li>c. <u>A project level Habitat Regulations Assessment will be required and Suitable Alternative Natural Greenspace (SANGs);</u></li> <li>d. <u>Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green infrastructure both on and off the site in its vicinity as appropriate, include a 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside;</u></li> <li>d. e. <u>Transport measures including:</u> <ul style="list-style-type: none"> <li>○ <u>highway and junction improvements on Humber Doucy Lane and Tuddenham Road;</u></li> <li>○ <u>walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;</u></li> <li>○ <u>public transport enhancements; and</u></li> <li>○ <u>appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy;</u></li> </ul> </li>   <li>f. <u>Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure sufficient primary school capacity is provided to meet demand generated from the strategic allocation at the northern end of Humber Doucy Lane;</u></li> </ul> </li> </ul>	
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			<p><b><u>g. The development will be triggered by the ability to provide the necessary primary school capacity on the Red House element of Ipswich Garden Suburb or an agreement between the landowner and Suffolk County Council, as the Education Authority, to provide a primary school on the Humber Doucy Lane development;</u></b></p> <p><b><u>h. As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and</u></b></p> <p><b><u>i. A financial contribution to off-site healthcare facilities.'</u></b></p>	
MM18	42	Paragraph 8.24	<p>Amend paragraph 8.24 to read as follows:</p> <p>'One area where a cross-border allocation for future development has been identified is the northern end of Humber Doucy Lane adjacent to Tuddenham Road, where land was promoted through the previous Local Plan Review and again through the call for sites process in 2017. The indicative development capacity of the land within the boundary of Ipswich Borough Council is <del>496</del> <u>449</u> dwellings. <del>The site sheet ISPA4.1 in Appendix 3 of the Site Allocations DPD provides further information on this indicative capacity.</del> In addition, the Suffolk Coastal Local Plan has allocated a site (<u>SCLP12.24</u>) on the East Suffolk side of the Ipswich boundary. It is essential that the two authorities work together to provide a comprehensive approach to the land as planned development. Policy ISPA 4 identifies the likely impacts of the development which would have to be mitigated in relation to demand arising from potential residents such as transport infrastructure and sustainable transport initiatives to create potential for a substantial modal shift change and green infrastructure. As part of the master planning work, <u>consideration should be given to the opportunity to provide convenience retail facilities on site to serve new and existing residents. Financial contributions will be required towards off-site healthcare facilities and the overall package of sustainable transportation measures to be delivered through the implementation of the ISPA Transport Mitigation Strategy.'</u> <del>mitigation measures required that arise from demand created by the development will be reconsidered, including possibly the need for healthcare facilities.'</del></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared and effective in the delivery cross-boundary strategic matters.
MM19	42	Paragraph 8.26	Amend paragraph 8.26 to read as follows:	For soundness in accordance with paragraph 35 of

			<p><del>'Development in this allocation for future development</del> will be required to deliver high quality design, which sensitively addresses adjacent countryside, biodiversity and existing dwellings. The development should also seek to preserve <u>and enhance the settings and significance of Westerfield House and the Listed Buildings to the north and east of the site, including <del>These are</del> Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse. The HIA (September 2020) discusses the sensitivity of the area and makes recommendations about how to bring forward development with regard to the sensitives of the historic landscape. It also identifies a number of non-designated heritage assets which development must also have regard to in terms of impact on significance. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable. Any subsequent planning application will require a full heritage impact assessment.'</u></p>	the NPPF, to ensure the Plan is consistent with national policy.
MM20	42	New Paragraph	<p>Insert two new paragraphs after paragraph 8.26 to read as follows:</p> <p><u>'These large greenfield areas have not been previously systematically investigated for archaeological remains. Archaeological evaluation should be undertaken to inform planning applications, comprising a combination of desk-based assessment, geo-physical survey and an appropriate level of trial trenched archaeological evaluation (see character zone 2c in Archaeology and Development SPD), in consultation with Suffolk County Archaeology.</u></p> <p><u>Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit (2019) provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved and protected during construction unless there are overriding reasons for their removal.'</u></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) to ensure the Plan to be clear and unambiguous.
MM21	42	Paragraph 8.27	<p>Amend paragraph 8.27 to read as follows:</p> <p><u>'A concentration of housing in this location is likely to require a bespoke Suitable <del>Accessible-Alternative</del> Natural Greenspace (SANG) in addition to contributions towards the Recreation Avoidance Mitigation Strategy, to function as an alternative to the coast. As proposals for the site progress, consideration should</u></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019)

			be given to how the nearby SANG being delivered as part of the Ipswich Garden Suburb and wider footpath network, may be linked to any new SANG provision.'	to ensure the Plan to be clear and unambiguous.
MM22	42	Paragraph 8.28	Amend paragraph 8.28 to read as follows:  'The site allocation at the northern end of Humber Doucy Lane is located at the edge of Ipswich approximately 3.5km from the town centre. Sustainable transport connections will be key to providing linkage to employment and other opportunities. In addition, <del>it is acknowledged that as part of the transport mitigation measures required for the development of the site, are challenging and</del> it is essential that significant modal shift is delivered through strong travel plans and other sustainable measures.'	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for the Plan to be clear and unambiguous.
MM23	44	Policy CS1	Amend POLICY CS1: Sustainable Development to read as follows:  <b>'POLICY CS1: SUSTAINABLE DEVELOPMENT</b>  <b>In Ipswich a comprehensive approach will be taken to tackling climate change and its implications through the policies of this plan. In particular, developers should address the requirements set out in <u>Local Plan policies: CS2(h); CS5; CS16; DM1; DM2; DM4; DM5; DM6; DM9; DM12 and DM21 in order to comply with Objective 4 of the Core Strategy.</u></b>  <b>When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively and jointly with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</b>  <b>Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.'</b>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.
MM24	45	Paragraph 8.44	Amend paragraph 8.44 to read as follows:	In accordance with the requirement in

			<p>'Many buildings in Ipswich are at risk of flooding, some from tidal surges, <u>some from fluvial flooding and some and many</u> from heavy rain. This risk will continue to grow as a result of rising sea levels and increasingly heavy rainstorms that can overwhelm drainage systems and cause localised flooding unless mitigation measures are implemented. At the strategic scale, tidal flood risk has been addressed through the effective completion of the Ipswich Flood Defence scheme. However, developments located within the flood plain will still need to address residual risk in accordance with the National Planning Policy Framework (e.g. the risk of defences failing) <u>and will also need to address fluvial risk which may increase over a development's lifetime</u>. Managing surface water run-off is also important. SuDS, rainwater harvesting, storage and where appropriate the use of green roofs or water from local land drainage will be required wherever practical. Such approaches shall be particularly mindful of relevant ecological networks. New buildings need to be more adaptable and resilient to climate change effects in future. This is taken forward through policy DM4.'</p>	<p>paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on proportionate evidence.</p>
MM25	45	Paragraph 8.45	<p>Amend the final two sentences of paragraph 8.45 to read as follows:</p> <p>'The Council's Strategic Flood Risk Assessment 2011 has been <u>substantially</u> updated. <u>It is a living document and will be subject to periodic review and update to reflect new modelling data as this becomes available</u>. The approach to flood risk and water infrastructure is addressed through policies CS17 and CS18, and DM4. Further guidance is contained in the Development and Flood Risk Supplementary Planning Document 2016, <u>which is also subject to review</u>.'</p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on proportionate evidence..</p>
MM26	48-49	Policy CS2	<p>Amend Policy CS2: The Location and Nature of Development, to read as follows:</p> <p><b>'POLICY CS2: THE LOCATION AND NATURE OF DEVELOPMENT</b></p>	<p>In accordance with the requirement in paragraph 16(d)</p>

		<p><b>The regeneration and sustainable growth of Ipswich will be achieved through:</b></p> <ul style="list-style-type: none"> <li><b>a. Focusing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter (<del>formerly Ipswich Village</del>), and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development;</b></li> <li><b>b. Allocating sites for future development at the northern end of Humber Doucy Lane for housing and associated infrastructure, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4);</b></li> <li><b>c. Working with neighbouring authorities to address housing need and delivery within the Ipswich housing market area;</b></li> <li><b>d. Focusing major new retail development into the Central Shopping Area with smaller sites identified in district centres;</b></li> <li><b>e. Focusing new office, hotel, cultural and leisure development into Ipswich town centre;</b></li> <li><b>f. Directing other employment uses (<del>B1E(g)</del> (except office), B2 and B8) to employment areas distributed in the outer parts of the Borough, and there will be a town centre first approach to the location of offices;</b></li> <li><b>g. Dispersing open space based (non-commercial) leisure uses throughout the town with preferred linkage to ecological networks and/or green and blue corridors, and protecting the countryside from inappropriate development in accordance with Policy DM11; and</b></li> <li><b>h. Development demonstrating principles of high quality architecture and urban design and which enhances the public realm, ensures the security and safety of residents and is resilient to climate change.</b></li> </ul> <p><b>A sustainable urban extension to north Ipswich will be delivered subject to the provision of suitable infrastructure (see policy CS10 – Ipswich Garden Suburb).</b></p> <p><b>Major developments within the town centre, Portman Quarter, Waterfront and district centres should incorporate a mix of uses to help achieve integrated, vibrant and sustainable communities. Major developments (for the purposes of this policy) are defined as commercial developments of 1,000 sq. m or more or residential developments of 10 dwellings or more. Exceptions may be made for large offices or education buildings for a known end user, or for residential use where this would itself diversify the land use mix provided by surrounding buildings and complies with other policies of the plan.</b></p>	<p>of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective and consistent with national policy.</p>
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			<b>In the interests of maximising the use of previously developed land, <u>residential development densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it <del>does not compromise</del> respects and responds positively to the heritage assets and the historic character of Ipswich. Further detail on the Council’s approach to density is out in Policy DM23 The Density of Residential Development.</u></b>	
MM27	49	Paragraph 8.55	<p>Amend paragraph 8.55 to read as follows:</p> <p>‘This approach to the location of development enables multiple objectives to be achieved.</p> <ul style="list-style-type: none"> <li>· It will maximise opportunities to re-use previously developed land within central Ipswich.</li> <li>· It will ensure that new housing is provided close to local shops and facilities that can be accessed by non-car modes, which contributes to reducing carbon emissions and supporting communities.</li> <li>· It will support the ongoing regeneration of central Ipswich and particularly of the Waterfront and town centre.</li> <li>· It will help to ensure the effective and efficient use of land through developing at appropriate densities according to the accessibility of the location.</li> <li>· It will create a sustainable Garden Suburb to help meet the housing needs of the Borough.</li> <li>· <del>As development draws to a conclusion at Ipswich Garden Suburb, it</del> will enable lower density housing development to be master planned jointly with East Suffolk Council at the northern end of Humber Doucy Lane, which will maintain and ensure separation between Ipswich and surrounding settlements.</li> </ul>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and consistent with national policy.
MM28	49	Paragraph 8.58	<p>Amend paragraph 8.58 to read as follows:</p> <p><del>‘Later in the plan period after 2031, the Council’s housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough’s housing requirement as identified</del></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and

			<p>through objectively assessed housing need and in accord with local housing need calculated using the Standard Method. The Council has set out a strategy to meet the requirement through a combination of strategic and more local allocations. In addition, it has thoroughly reviewed the development potential within the Borough boundary through an updated Strategic Housing and Economic Land Availability Assessment (SHELAA) published in January 2020. Part of the Council’s ability to meet this requirement depends on development coming forward at but within the boundary of Ipswich, as addressed through policy ISPA4.’</p>	<p>unambiguous and to ensure the Plan is justified as an appropriate strategy based on proportionate evidence.</p>
MM29	52	Policy CS3	<p>Amend Policy CS3: IP-One Area Action Plan to read as follows:</p> <p><b><u>‘The Council will prepare has prepared and implement is implementing an IP-One Area Action Plan, incorporated in the Site Allocations and Policies Development Plan Document, to plan for significant change in central Ipswich and help to deliver the Ipswich Vision. The Area Action Plan will include policies which:</u></b></p> <ul style="list-style-type: none"> <li><b>a. Define the extent of the Waterfront and the Portman Quarter (formerly Ipswich Village) and set out policy for development within them;</b></li> <li><b>b. Allocate sites for development in IP-One;</b></li> <li><b>c. Set down development principles which will be applied to new development within the Opportunity Areas identified on the IP-One Area inset policies map, unless evidence submitted with applications indicates that a different approach better delivers the plan objectives;</b></li> <li><b>d. Define and safeguard the Education Quarter to support the development of the University of Suffolk and Suffolk New College;</b></li> <li><b>e. Identify heritage assets which development proposals will need to have regard to and integrate new development with the existing townscape;</b></li> <li><b>f. Define the Central Car Parking Core within which parking controls will apply;</b></li> </ul>	<p>In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.</p>

			<p><b>g. Identify where new community facilities and open space should be provided within IP-One;</b></p> <p><b>h. Provide a framework for the delivery of regeneration in IP-One and address the need for infrastructure, including the need for an additional access to the Island Site; and</b></p> <p><b>i. Provide tree-planting and urban greening schemes, mindful of the ecological network, to improve the street scene and permeability for wildlife throughout the town centre.</b></p> <p><b>Sites and designated areas within the IP-One Area will be identified on a revision of the IP-One Area Inset Policies Map to be prepared alongside the Development Plan Document.'</b></p>	
MM30	53	Paragraph below Policy CS3	<p>Amend paragraph below Policy CS3 to read as follows:</p> <p>'Area action plans are intended as a tool to guide development in areas where change is expected and/or conservation policies apply. IP-One includes both types of area, encompassing as it does the medieval core of the town, which now forms the focus for the Central Shopping Area; the Waterfront and Portman Quarter where regeneration activities are focused at present; and the Education Quarter where the University of Suffolk is located. The IP-One Area Action Plan builds on earlier work that resulted in the publication of a non-statutory area action plan in 2003. The Opportunity Area development principles <u>policies</u> are identified through Chapter 6 of <u>contained in</u> the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.'</p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.
MM31	55	Policy CS4	<p>Amend Policy CS4 to read as follows:</p> <p><b>POLICY CS4: PROTECTING OUR ASSETS</b></p> <p><b>The Council is committed to conserving and enhancing the Borough's built, heritage, natural and geological assets.</b></p> <p><b>The Council will conserve, and promote the enjoyment of, the historic environment. To this end, it will:</b></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.



		<ul style="list-style-type: none"> <li><b>i) conserve and enhance the character and appearance of conservation areas, by preparing and reviewing where necessary character appraisals and using them to guide decisions about development;</b></li> <li><b>ii) review the extent of conservation areas and designate any new areas or amend boundaries as appropriate;</b></li> <li><b>iii) conserve and enhance heritage assets within the Borough through the development management policies in this plan, the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of heritage assets of local importance, such as buildings or parks, and taking steps to reduce the number of heritage assets at risk;</b></li> <li><b>iv) Promote local distinctiveness and heritage assets through the publication and review of Supplementary Planning Documents (SPDs) including the Ipswich Urban Character SPD and the Development and Archaeology SPD; and</b></li> <li><b>v) Recognise the wider role heritage can play in regeneration, as a cultural, educational, economic and social resource.</b></li> </ul> <p><b>The Council will also seek to protect and enhance local biodiversity, trees and soils in accordance with the National Planning Policy Framework and national legislation by:</b></p> <ul style="list-style-type: none"> <li><b>a. Applying full protection to international, national and local designated sites and protected and priority species;</b></li> <li><b>b. Requiring new development to incorporate provision for protecting and enhancing geodiversity interest and provide biodiversity net gain that is proportion to the scale and nature of the proposal. Reference should be made to the information and recommendations of the Wildlife Audit in relation to any proposals on, or that may affect, sites identified within it;</b></li> </ul>	
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			<p>c. <b>Avoiding the loss of ancient woodland and ancient or veteran trees in accordance with national policy, and requiring new development to plant the veteran trees of the future using appropriate native species of local provenance;</b></p> <p>d. <b>Supporting and securely funding the Greenways Project;</b></p> <p>e. <b>Designating additional Local Nature Reserves where appropriate;</b></p> <p>f. <b>Preparing and implementing management plans for Council owned wildlife sites;</b></p> <p>g. <b>Identifying, <u>protecting and enhancing</u> an ecological network across Ipswich and linking into adjacent areas, <del>and protecting and enhancing it</del> in accordance with policy DM8, <del>to maximising</del> <u>the benefits to the local of ecosystem services and providing biodiversity net gains beyond the level anticipated through the scale of development proposed; for biodiversity to enable delivery through development proportion to the scale of that development.</u></b></p> <p>h. <b>Conserving and enhancing the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and requiring development to respond to local landscape sensitivity;</b></p> <p>i. <b>Preventing the spread of non-native invasive species by ensuring that an appropriate biosecurity proposal is adopted; and</b></p> <p>j. <b>Protecting and enhancing valued soils.</b></p> <p><b>The Council will encourage the use of local reclaimed, renewable, recycled and low environmental impact materials in construction, in order to conserve finite natural resources and minimise environmental impacts. New development will also be required to minimise the amount of waste generated during construction and through the lifetime of the building.'</b></p>	
MM32	57	Paragraph 8.78	Amend paragraph 8.78 to read as follows:	In accordance with the requirement in

			<p>'The Orwell Estuary provides an important ecological network and landscape setting for Ipswich and helps define its history. It is characterised by its broad expanse of water and its gently rolling, wooded banks. Outside Ipswich Borough, much of the land on the banks of the river falls within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The transition between the built-up character of Ipswich and open countryside is quite sharply defined around most of the present Borough boundary, with the transition from urban to rural appearance and uses being clearly appreciable. The Orwell Estuary will be covered by the South East Inshore Marine Plan when it is completed (consultation took place early in 2018). This will set out priorities and directions for future development within the plan area, inform sustainable use of marine resources, and help marine users understand the best locations for their activities, including where new developments may be appropriate. <del>An South The East Inshore and South-East Offshore Marine Plans were</del> <u>was</u> adopted on 2nd April 2014 <del>which</del> <u>and</u> covers an area adjacent to the Suffolk Coast north of the River Orwell. <u>The South East Marine Plan which covers an area from Landguard Point in Felixstowe to Samphire Hoe near Dover was published for public consultation in January 2020 and is therefore also a material consideration.'</u></p>	<p>paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.</p>
MM33	60	Policy CS5	<p>Amend Policy CS5: Improving Accessibility, to read as follows:</p> <p><b>'POLICY CS5: IMPROVING ACCESSIBILITY</b></p> <p><b>Development should be located and designed to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport (bus and rail). This will encourage greater use of these modes. <u>Transport Statements and Assessments should test the impact of development proposals on modal shift across the wider network and should demonstrate that they will support the achievement of at least a 15% modal shift, in accordance with the ISPA Transport Mitigation Strategy.</u> The Council will work with the Highway Authority including through the Local Transport Plan and the Suffolk County Council Transport Mitigation Strategy, to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network.</b></p> <p><b>The Council will support the expansion of electronic communications networks throughout the plan area as a means to support economic growth and enable home working, and thus reduce the need to travel.</b></p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and consistent with national policy.</p>

			<p><b>The Council also recognises that some journeys will need to be made by car. The vitality and viability of the town centre depends on people being able to access it by a variety of modes. This will be managed through policies for car parking.</b></p> <p><b>The Council will work with partners to promote the inclusive and age-friendly design of buildings, public spaces, highways and transport infrastructure.'</b></p>	
MM34	63	Paragraph 8.104	<p>Amend paragraph 8.104 to read as follows:</p> <p>'In July 2018, the Government published the revised National Planning Policy Framework (NPPF), which requires local planning authorities to use a standard method to quantify local housing need. The NPPF was further revised in February 2019 along with updated planning practice guidance. This advised that local planning authorities use the 2014-based household projections in their housing need assessments. The effect of this has been to reduce the housing need figure to <del>445-460</del> dwellings per annum 2018 to 2036, or <del>8,010</del> <u>8,280</u> dwellings for the eighteen year period, as a starting point. Table 3 below sets out the housing land supply and minimum requirement figures as at April <del>2019-2020</del>, looking forward to 2036.'</p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.
MM35	64	Table 3: Housing Land Supply and Minimum Requirement	Amend Table 3 Housing Land Supply and Minimum Requirement at 1 <sup>st</sup> April 2019 as set out in Appendix 2.	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area's objectively assessed housing

				needs, as identified in the most up to date Standard Method for calculating housing need.
MM36	65 – 66	Policy CS7	<p>Amend Policy CS7: The Amount of New Housing Required, to read as follows:</p> <p><b>‘POLICY CS7: THE AMOUNT OF NEW HOUSING REQUIRED</b></p> <p><b>a. The Council has a housing requirement of at least <del>8,010,280</del> 445,460 dwellings for the period 2018 – 2036. This equates to an annual average of at least <del>445,460</del> dwellings. <del>The Council will, with its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area.</del></b></p> <p><b>b. The Council will secure the delivery of at least <del>445,460</del> dwellings per year as an average across the plan period to meet need arising from Ipswich. At 1st April <del>2019-2020</del>, <del>223,644</del> dwellings <del>have had</del> been completed since the start of the plan period, and <del>1,687,3,205</del> dwellings (discounted figure) <del>are were</del> under construction, <del>have had</del> <u>had</u> planning permission or <del>have</del> a resolution to grant planning permission subject to a s106 agreement within the Borough.</b></p> <p><b>The Council will additionally allocate land to provide for at least <del>6,100,4,431</del> dwellings (net) in the Borough. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period. Sites are identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb and the northern end of Humber Doucy Lane. <del>700-650</del> dwellings are expected to be delivered on small windfall sites between <del>2022-2023</del> and 2036 at a rate of 50 per year. The housing land supply for the plan period will consist of:</b></p> <p><b>Housing Land Supply</b></p> <p><b>Ipswich Garden Suburb (3,500 minus <del>232</del> 205 completions expected late 2036 and <del>1,888</del> 1,915 granted planning permission in January 2020) <del>3,268-1,380</del></b></p>	<p>For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area’s objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.</p>

			<p>Northern end of Humber Doucy Lane allocated through policy ISPA4 <span style="float: right;"><b>496 449</b></span></p> <p>Site Allocations through policy SP2 of the Site Allocations Plan <span style="float: right;"><b><del>2,750</del> 2,880</b></span></p> <p>Sub-total <span style="float: right;"><b>6,514 4,709</b></span></p> <p>Windfall sites <del>2022</del> <u>2023</u> – 2036 @ 50 p.a. <span style="float: right;"><b><del>700</del> 650</b></span></p> <p>Total <span style="float: right;"><b>7,214 5,359</b></span></p> <p>c. In accordance with the Planning Practice Guidance, the housing requirement will be stepped to reflect the period when delivery at the strategic site of Ipswich Garden Suburb is expected to take place. From 2024 to 2036, completions at Ipswich Garden Suburb will meet a significant proportion of the annual housing requirement. Delivery will also take place at the northern end of Humber Doucy Lane, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure. The housing requirement will be stepped as follows:  April 2018 – March 2024 300 p.a. x 6 years = 1800  April 2024 – March 2036 <del>518</del> <u>540</u> p.a. x 12 years = <del>6216</del> <u>6480</u></p> <p>In order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement of <del>8010</del> <u>8280</u> dwellings. This excludes the Opportunity Sites identified through policy <del>SP4</del> <u>SP20</u>.'</p>	
MM37	66	Paragraph 8.109	<p>Amend paragraph 8.109 to read as follows:</p> <p><del>'Due to the constrained nature of the Borough boundary, the Council has a limited capacity for future development. The Council is actively working to deliver within the Borough with neighbouring authorities to identify its own share of the identified housing need from across the Ipswich Housing Market Area through and prepare aligned Local Plans to deliver it. The Council considers that the Ipswich housing need identified above can be met within the borough. Housing delivery will be closely monitored across the Ipswich Strategic Planning Area. Ipswich Borough Council has published a Housing Delivery Action Plan to support delivery within the Borough.'</del></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous and to ensure the Plan is justified in

				accordance with the tests of soundness in paragraph 35 of the NPPF.
MM38	66	Paragraph 8.111	Amend paragraph 8.111 to read as follows:  ‘The phasing of housing sites will be informed by the findings of the SHELAA, infrastructure delivery and the preparation of master plans. The SHELAA informs the Council’s housing trajectory. It is based on recent contact with developers and landowners. It is from this potential supply that site allocations are drawn. Within the tightly drawn boundary of Ipswich, options for the housing land supply are inevitably limited. <u>The Council’s housing trajectory at 1<sup>st</sup> April 2020 is presented in Diagram 4 below, in accordance with paragraph 73 of the NPPF. The sites which form the trajectory at 1<sup>st</sup> April 2020 are listed in Appendix 9. The housing trajectory is updated annually through the Authority Monitoring Report.</u> Table 4 below provides a breakdown of the housing land supply. Delivery will be monitored closely through the Council's Authority Monitoring Report.’	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified.
MM39	67	New Diagram	Insert a new Diagram (Ipswich Housing Trajectory at 1 <sup>st</sup> April 2020) after paragraph 8.111 as set out in Appendix 3.	For soundness in accordance with paragraph 35 of the NPPF.
MM40	68	Table 4: Estimated Housing Delivery	Amend Table 4 Estimated Housing Delivery for 2020-2036 Excluding Current Permissions as at 1 <sup>st</sup> April 2020 as set out in Appendix 4.	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area’s objectively assessed housing

				needs, as identified in the most up to date Standard Method for calculating housing need.
MM41	69	Policy CS8	<p>Amend Policy CS8: Housing Type and Tenure, to read as follows:</p> <p><b>'The Council will plan for a mix of dwelling types to be provided, in order to achieve strong, vibrant and healthy communities. All major schemes of 10 dwellings or more will be expected to provide a mix of dwelling types and sizes.</b></p> <p><b>Exceptions to this approach will only be considered where:</b></p> <ul style="list-style-type: none"> <li><b>a. A different approach is demonstrated to better meet housing needs in the area; or</b></li> <li><b>b. The site location, characteristics or sustainable design justify a different approach; or</b></li> <li><b>c. A different approach would expedite the delivery of housing needed to meet targets and is acceptable in other planning terms.</b></li> </ul> <p><b>In considering the most appropriate mix of homes by size and type for major residential development proposals, the Council will take a flexible approach <del>having regard to the needs identified through taking into account needs identified through the current Ipswich Strategic Housing Market Assessment, where it remains up to date,</del> <u>and</u> any other evidence of local needs supported by the Council and the policies of this plan.</b></p> <p><b>Over the plan period, the Council will seek to secure a diverse range of housing tenures in the market and affordable sectors, to support the creation of mixed and balanced communities. Overall provision should meet the needs identified through the Ipswich Strategic Housing Market Assessment, where it remains up to date, and any other evidence of local needs supported by the Council. Affordable housing provision within market housing schemes will be made in accordance with policy CS12.</b></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified.</p>



			<p><b>For affordable housing provision, the most appropriate type, size and mix for each development will be guided by the Council’s Affordable Housing Position Statement, where it remains up to date, and the particular characteristics of the site.</b></p> <p><b>The Council will support Self Build, Custom Build and Co-Housing developments for residential accommodation in appropriate locations, in the interests of supporting high quality homes which meet the identified needs of the Borough. In considering major development applications, the Council will consider the currently applicable Self Build Register and whether provision should be included within the development.’</b></p>					
MM42	70	Paragraph 8.118	<p>Amend paragraph 8.118 to read as follows:</p> <p>‘The mix of new housing that would best address the needs of the local population by tenure for Ipswich by 2036 is: 20.5% of housing to be affordable rented, 63.5% market housing including private rent, and 16.1% affordable home ownership (including shared ownership and <del>Starter Homes</del> <u>First Homes</u>). However, these figures do not take into account the funding that will be available to help provide subsidised housing and viability and therefore this profile is set out as a guide to the overall mix of accommodation needed.’</p>	To reflect the change in national policy.				
MM43	74-76	Policy CS10	<p>Amend Policy CS10: Ipswich Garden Suburb, to read as follows:</p> <p><b>‘POLICY CS10: IPSWICH GARDEN SUBURB</b></p> <p><b>Land at the northern fringe of Ipswich, which is referred to as Ipswich Garden Suburb, will form a key component of the supply of housing land in Ipswich during the plan period.</b></p> <p><b>The site, identified on the policies map, consists of 195ha of land which will be developed comprehensively as a garden suburb of three neighbourhoods: Henley Gate neighbourhood (east of Henley Road and north of the railway line), Fonnereau neighbourhood (west of Westerfield Road and south of the railway line) and Red House neighbourhood (east of Westerfield Road). Over the plan period, the site will deliver land uses as set out below:</b></p> <table border="0" style="width: 100%; margin-left: 40px;"> <tr> <td style="text-align: center;"><b>Land use</b></td> <td style="text-align: right;"><b>Approximate area in hectares</b></td> </tr> <tr> <td style="text-align: center;"><b>Public Open space, sport and recreation facilities including dual use playing fields</b></td> <td style="text-align: right;"><b>40</b></td> </tr> </table>	<b>Land use</b>	<b>Approximate area in hectares</b>	<b>Public Open space, sport and recreation facilities including dual use playing fields</b>	<b>40</b>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, and for soundness in accordance with paragraph 35 of the NPPF, and, the Town and Country Planning (Use Classes) (Amendment)
<b>Land use</b>	<b>Approximate area in hectares</b>							
<b>Public Open space, sport and recreation facilities including dual use playing fields</b>	<b>40</b>							

			<p><b>A Country Park (additional to the public open space above) 24.5 (minimum)</b></p> <p><b>Residential development of approximately 3,500 dwellings (of which at least 3,295 dwellings would be within the plan period) 100</b></p> <p><b>A District Centre located within Fonnereau Neighbourhood, providing: 3.5</b></p> <ul style="list-style-type: none"> <li>i. A maximum of 2,000 sq m net of convenience shopping, to include a medium/large supermarket between 1,000 and 1,700 sq m net;</li> <li>ii. Up to 1,220 sq m net of comparison shopping;</li> <li>iii. Up to 1,320 sq m net of services uses <del>including non-retail Use Class A1, plus A2 to A5 uses to include only</del> <u>restaurants, cafes, offices, public house and hot food takeaway uses;</u></li> <li>iv. Healthcare provision;</li> <li>v. A library;</li> <li>vi. A police office;</li> <li>vii. A multi-use community centre; and</li> <li>viii. Residential accommodation in the form of appropriately designed and located upper floor apartments.</li> </ul> <p><b>Two Local Centres located in Henley Gate and Red House neighbourhoods, together providing: 1.5 including 0.5ha per local centre in the Henley Gate and Red House</b></p> <ul style="list-style-type: none"> <li>i. Up to 500 sq m net of convenience retail floorspace</li> </ul>	(England) Regulations 2020, to ensure the Plan is consistent with national policy.
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			<ul style="list-style-type: none"> <li>ii. Up to 600 sq m net of comparison retail floorspace; and</li> <li>iii. Up to 500 sq m net of service uses <del>including non-retail Use Class A1, plus Classes A2 to A5</del> to include only <u>restaurants, cafes, offices, public house and hot food takeaway uses</u>; and</li> <li>iv. Community Centre use (which could include Country Park Visitor Centre use) located in Henley Gate</li> </ul> <p>A secondary school within the Red House neighbourhood with access from Westerfield Road 9</p> <p>Three primary schools (one in each neighbourhood) 6</p> <p><u>Primary road infrastructure, including a road bridge over the railway to link the Henley Gate and Fonnereau neighbourhoods</u> 5</p> <p>The broad distribution of land uses is indicated on the Policies Map. The detailed strategic and neighbourhood infrastructure requirements for the development are included in Table 8B in Chapter 10. Triggers for their delivery will be identified through the Ipswich Garden Suburb Infrastructure Delivery Plan.</p> <p>Future planning applications for the site shall be supported by an Infrastructure Delivery Plan based on the identified infrastructure requirements set out in Table 8B. The Infrastructure Delivery Plan shall set out in detail how the proposed development and identified strategic and neighbourhood infrastructure will be sequenced and delivered within the proposed schemes.</p> <p>Overall, the Council will seek 31% affordable housing at Ipswich Garden Suburb. For each individual application, the level of affordable housing should be the maximum compatible with achieving the overall target and achieving viability, as demonstrated by an up to date viability assessment which has been subject to independent review. The re-testing of the viability will occur pre-implementation of individual applications within each neighbourhood. Each phase of development will be subject to a cap of 35% affordable housing. The Council will seek a mix of affordable dwelling types, sizes and tenures in accordance with policies CS8 and CS12.</p>	<p>neighbourhoods and 0.5ha within the Henley Gate neighbourhood for the country park visitor centre and community centre.</p>	
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			<p><b>An Ipswich Garden Suburb supplementary planning document (SPD) has been adopted, which will:</b></p> <ol style="list-style-type: none"> <li><b>a. guide the development of the whole Ipswich Garden Suburb area;</b></li> <li><b>b. amplify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration;</b></li> <li><b>c. <del>identify</del> guide the detailed location of a district and two local centres and other supporting infrastructure; and</b></li> <li><b>d. provide guidance on the sequencing of housing and infrastructure delivery required for the development.</b></li> </ol> <p><b>Development proposals will be required to demonstrate <del>that they are in accordance with the SPD</del> how they have had regard to the principles, objectives and vision of the adopted 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.</b></p> <p><b>Any development will maintain an appropriate physical separation of Westerfield village from Ipswich and include green walking and cycling links to Westerfield station, and provide the opportunity for the provision of a country park as envisaged by <u>Policy CS16</u> and is more particularly identified in the SPD.</b></p> <p><b>The land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields necessary to enable development of the Ipswich School playing field site as part of the Garden Suburb development.'</b></p>	
MM44	76	Paragraph 8.129	<p>Amend paragraph 8.129 to read as follows:</p> <p>'The indicative capacity at the Northern Fringe (Ipswich Garden Suburb) identified in the Strategic Housing Land Availability Assessment: has been reduced to 3,500 dwellings following early capacity work on the Ipswich Garden Suburb supplementary planning document. The Council has identified a need for 8,010</p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively

			<p>8,280 dwellings between 2018 and 2036, and the Garden Suburb forms a key component of meeting this need. The Council will work with Babergh, Mid Suffolk and <del>Suffolk Coastal</del> <u>East Suffolk</u> District Councils to ensure optimum sustainable distribution of housing within the Ipswich Strategic Planning Area, bearing in mind the amenity and ecological value of the countryside outside the Borough boundary as well as within it, and the increased congestion effects of any development outside the Borough boundary.'</p>	<p>prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date the Standard Method for calculating housing need.</p>
MM45	80	Paragraph 8.139	<p>Amend paragraph 8.139 to read as follows:</p> <p>'Local housing authorities will continue to decide how best to undertake their duties to assess the needs of all their residents and those who resort in their area. This will be in accordance with the legal obligations in the Equality Act 2010. National planning policy for Gypsies and Travellers is set out in Planning Policy for Traveller Sites (2015) (PPTS) and requires planning authorities to use their evidence to plan positively to meet the needs of Gypsies &amp; Travellers and Travelling Show People and Boat <del>Dwellers</del> <u>People</u>. <u>The accommodation needs of Gypsies and Travellers need to be considered alongside those of the 'settled' population. The PPTS amends the definition of Gypsies and Travellers for planning purposes to exclude those who have ceased travelling permanently.'</u></p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.</p>
MM46	80	Paragraph 8.140	<p>Amend paragraph 8.140 to read as follows:</p> <p><del>'Ipswich has 43 permanent pitches for Gypsies and Travellers at present, and t</del><u>The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) 2017 identifies</u> the Borough's needs <u>from 2016 to 2036 as 27 permanent pitches. In addition, national guidance requires the Core Strategy to include a criteria based policy to guide the siting and location of sites for Gypsies and travellers. The accommodation needs of Gypsies and travellers need to be</u></p>	<p>For soundness in accordance with paragraph 35 of the NPPF and the 2015 Planning Policy for Traveller Sites, to ensure the Plan is positively</p>

			<p><del>considered alongside those of the ‘settled’ population. The revised national Planning Policy for Traveller Sites, published in August 2015, amends the definition of Gypsies and Travellers for planning purposes to exclude those who have ceased travelling permanently. However, an update to the need and supply position in Ipswich undertaken during 2020 indicates that the need for pitches 2016-2021 has been met through changes at the existing Gypsy and Traveller site at West Meadows, including families moving away and reorganisation of the site to create additional pitches. As a result, there is an outstanding need for 13 additional pitches to be provided in the period 2021-36. Of these, 3 are needed between 2021 and 2026, 5 between 2026 and 2031 and 5 between 2031 and 2036.’</del></p>	<p>prepared and consistent with national policy in respect of the provision of need for gypsy and traveller accommodation.</p>
MM47	80	New Paragraph	<p>Insert a new paragraph after paragraph 8.140 to read as follows:</p> <p><u>‘There is scope at the West Meadows site to meet the additional need over the plan period. Accordingly, extensions are proposed to the west and east of the existing West Meadows site, as sites IP400a (0.38ha) and IP400b (0.12ha), to ensure that the remaining needs to 2036 can be met and that the site can meet Government design requirements and expectations. The Council will also continue to work proactively with gypsy and traveller families to bring forward small sites which may better meet their needs. National guidance requires the Core Strategy to include a criteria based policy to guide the siting and location of sites for Gypsies and Travellers. Therefore, in addition to the extensions proposed at West Meadows, a criteria-based approach is set out in policy CS11 to guide planning applications for other sites which may come forward.’</u></p>	<p>For soundness in accordance with paragraph 35 of the NPPF and the 2015 Planning Policy for Traveller Sites, to ensure the Plan is positively prepared and consistent with national policy in respect of the provision of need for gypsy and traveller accommodation.</p>
MM48	80	Paragraph 8.141	<p>Delete paragraph 8.141 in its entirety as follows:</p> <p><del>‘Work is being undertaken with neighbouring authorities, the County Council and the Gypsy community to identify possible sites to meet the need to provide additional pitches in the Ipswich</del></p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is</p>

			Strategic Planning Area. The policy will provide the context for the ongoing provision of pitches over the plan period.'	effective in addressing cross-boundary issues.
MM49	80-81	Policy CS11	<p>Amend Policy CS11: Gypsy and Traveller Accommodation, to read as follows:</p> <p><b>'POLICY CS11: GYPSY AND TRAVELLER ACCOMMODATION</b></p> <p><b><u>Provision will be found made within the Ipswich Borough where possible for additional permanent pitches land to meet the need for 2713 permanent pitches for Gypsy and Traveller accommodation from 2021 to 2036, as identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment 2017, updated to reflect changes in need and provision at 2020. Where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision.</u></b></p> <p><b><u>The existing sites currently providing pitches for Gypsies and Travellers at West Meadows and Henniker Road are identified on the Policies Map and are protected for that use.</u></b></p> <p><b><u>Two extensions to the existing West Meadows Gypsy and Traveller site are allocated, as shown on the Policies Map:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>IP400a - an extension is proposed to the west of the existing site (0.38ha); and</u></b></li> </ul>	For soundness in accordance with paragraph 35 of the NPPF and the 2015 Planning Policy for Traveller Sites, to ensure the Plan is positively prepared and consistent with national policy in respect of the provision of need for gypsy and traveller accommodation.

- **IP400b - to the east of the existing site (0.12ha)**



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**Illustrative map of proposed allocations to be included in the Policies Map**



		<p><u>These will ensure that the pitch requirements to meet the needs of Gypsies and Travellers in the period 2021-2036 can be met and that the site as a whole can meet Government design requirements and expectations. Sufficient land will therefore be available at the West Meadow site to accommodate the need for 13 additional pitches to the end of the plan period and to provide some additional flexibility if demand for additional pitches changes over the plan period.</u></p> <p><u>However, provision of smaller sites for family groups better meets the identified needs of Gypsies and the travelling community in Ipswich. This is the preferred option, to ensure greater social cohesion with the settled community. It is anticipated that this such sites will be delivered through working closely with the gypsy and travelling community to bring forward appropriate planning applications.</u></p> <p><del>If Pitch provision is not delivered as anticipated, progress does not move forward, the Council will conduct a focussed review within 5 years and the results of this would feed into the next local plan as positive allocations.</del></p> <p><del>Applications for the provision of permanent pitches will be considered against the following criteria:</del></p> <p><del>a. The existing level of local provision and need for sites;</del>  <del>b. The availability (or lack) of alternative accommodation for the applicants; and</del>  <del>c. Applications for the provision of permanent pitches from or on behalf of persons <u>Other personal circumstances of the applicant, including the proposed occupants must meeting</u> the definition of Gypsy or Traveller will be supported subject to satisfying the criteria below:</del></p> <p><del>Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.</del></p> <p><del>d.a. The site should be located:</del></p> <p><del>i. where it would be well served by the road network; and</del>  <del>ii. where it would be well related to basic services including the public transport network.</del></p> <p><del>e-b. The site should be:</del></p> <p><del>i. accessible safely on foot, by cycle and by vehicle;</del></p>	
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			<p>ii. free from flood risk and significant contamination;  iii. safe and free from pollution;  iv. capable of being cost effectively drained and serviced, including with waste disposal and recycling facilities;  v. proportionate in size to any nearby settlements, to support community cohesion; and  vi. where possible, located on previously developed land.</p> <p><del>¶</del> <u>c.</u> The site should not have a significant adverse impact on:</p> <p>i. the residential amenity of immediate or close neighbours;  ii. the appearance and character of the open countryside;  iii. sites designated to protect their nature conservation, ecological networks, geological or landscape qualities;  iv. heritage assets including their setting; and  v. the <del>physical and social</del> infrastructure <u>and services</u> of local settlements.</p> <p>Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.</p> <p>The Council will work with Suffolk County Council and <del>neighbouring other local authorities in Suffolk to deliver identified needs for short stay stopping sites within Suffolk. develop a South Suffolk transit (short stay) site between Ipswich and Felixstowe.</del></p> <p><del>The needs of travelling showpeople will be kept under review. Applications for new sites will be assessed against criteria a. to c. above.</del></p> <p><del>Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.</del></p>	
MM50	81	Paragraph 8.143	<p>Delete paragraph 8.143:</p> <p><del>‘Sites will be sought to meet the joint needs of Ipswich and neighbouring authorities for permanent pitches within the Ipswich Strategic Planning Area. Need for Ipswich and its neighbouring authorities was identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) carried out in 2017 by RRR Consultancy Ltd. The 2017 ANA identified a need for 27 pitches in Ipswich Borough to 2036, out of a need for 52 pitches across the five local authority areas included</del></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be

			in the assessment (Ipswich, Babergh, Mid-Suffolk, Suffolk Coastal and Waveney). Of the 27 pitches needed in Ipswich, 13 are needed between 2016 and 2021, 4 between 2021 and 2026, 5 between 2026 and 2031 and 5 between 2031 and 2036. No need was identified in Ipswich for the other types of provision.	clear and unambiguous
MM51	81	Paragraph 8.144	Amend paragraph 8.144 to read as follows:  <del>'The Council will work with Suffolk authorities to meet the joint transit (short stay) and permanent needs and the needs of travelling showpeople.</del> The ANA identifies a need for three short stay sites across the study area. <u>The short stay work is both identifying suitable sites and developing a countywide short stay policy with local authorities and the police.'</u>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in addressing cross-boundary issues.
MM52	81	Paragraph 8.145	Delete paragraph 8.145 in its entirety as follows:  <del>'Just as affordable housing is delivered through the planning system in larger housing developments where there is a local need, so the needs of Gypsies and Travellers should be met in a more systematic manner.'</del>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.
MM53	82	Paragraph 8.147	Amend paragraph 8.147 to read as follows:  <del>'The existing site at West Meadows is a large one containing 41 , which contained 42 pitches in 2017 (37 occupied plus 5 unused). In 2020 the site had enlarged to 48 pitches (43 occupied plus 5 unoccupied) making an increase of 6 pitches.</del> Whilst the Council would not limit the size of new sites, <del>anecdotal strong evidence through the ANA is that preferences in the Gypsy and Traveller community locally is</del> <u>are</u> for smaller sites to provide pitches for family groups.'	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on the evidence.
MM54	83	Paragraph 8.150	Amend Paragraph 8.150 to read as follows:  'Affordable housing is defined through the National Planning Policy Framework (NPPF) glossary as housing for sale or rent, for those whose needs are not met by the market, including housing that provides a	To reflect the change in national policy.

			<p>subsidised route to home ownership or is for essential local workers. The definition continues with a detailed breakdown of four types of provision:</p> <ul style="list-style-type: none"> <li>• affordable housing for rent, which includes Social Rent and Affordable Rent.</li> <li>• <del>Starter</del><u>First Homes</u>, which are new build homes <u>sold to a person or persons meeting the First Homes eligibility criteria at a minimum 30% discount against the market value or at a maximum of £250,000 for young, first-time buyers (below 40 years) to buy with a minimum 20% discount off the market price;</u></li> <li>• Discounted market sales housing which is sold at a discount of at least 20% below local market value; and</li> <li>• Other affordable routes to home ownership including shared ownership, equity loans, other low cost homes for sale, and rent to buy.'</li> </ul>	
MM55	83	Policy CS12	<p>Amend POLICY CS12: Affordable Housing, to read as follows:</p> <p><b>'POLICY CS12: AFFORDABLE HOUSING</b></p> <p><b>The Council will seek to ensure that a choice of homes is available to meet identified affordable housing needs in Ipswich. Outside the Ipswich Garden Suburb and the northern end of Humber Doucy Lane, this will be achieved by requiring major new developments of 15 dwellings or more (or on sites of 0.5ha or more) to provide for at least 15% on-site affordable housing by number of dwellings. <u>The requirement for affordable housing does not apply to developments composed of 65% or more flats on brownfield sites.</u></b></p> <p><b>At least 60% of affordable housing provision shall consist of affordable housing for rent including social rent and the remainder affordable home ownership.</b></p> <p><b>The Council will only consider reducing the requirement for the proportion of affordable housing on a particular development site, or amending the tenure mix to include more affordable home ownership, in accordance with national policy or where:</b></p> <p><b>a. Alternative provision is outlined by the applicant within a site-specific viability assessment (using a recognised toolkit) and the conclusions are accepted by the Council;</b></p> <p><b>or</b></p> <p><b>b. An accepted independent review of development viability finds that alternative provision on viability grounds is justifiable; and</b></p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on the evidence and consistent with national policy.</p>

			<p><b>c. The resultant affordable housing provision would ensure that the proposed development is considered sustainable in social terms through its delivery of housing integration, with particular regard to meeting the identified need for small family dwellings where these can reasonably be integrated into the scheme.</b></p> <p><b>The presumption will be in favour of on-site provision rather than the payment of commuted sums in lieu of provision. Affordable housing should be integrated into developments and should not be readily distinguishable from market housing.</b></p> <p><b><u>Affordable housing is defined in Appendix 5 of this document.</u></b></p>	
MM56	84	Paragraph 8.153	<p>Amend Paragraph 8.153 to read as follows:</p> <p>‘The Ipswich Strategic Housing Market Assessment Part 2 Report 2017 and updated 2019 indicates that the mix of housing that would best address the needs of the local population would be an overall requirement for 20.5% of new homes to be affordable housing for rent (including social rent) and 16.1% affordable home ownership (including Shared Ownership and Starter Homes). Thus, affordable housing need represents approximately 36% of overall housing need. However, in setting the appropriate affordable housing requirement for the plan, the Council needs to take into account the funding available to help provide subsidised housing and the viability of delivery in Ipswich. The Ipswich Whole Plan Viability Report indicates that for most types of site (greenfield or brownfield and large or small), at least 15% affordable housing provision is a realistic and deliverable requirement other than in wholly or mainly flatted developments in the lower value area. <u>Therefore, to reflect the evidence in the Whole Plan Viability Report, flat-led developments on brownfield sites are not required to provide affordable housing. The 65% or more threshold constituting flat-led developments will be calculated based on the proportion of the total dwellings on a proposed development that consist of flats. For developments that are not flat-led on brownfield land,</u> <del>E</del>expressing the requirement as a minimum reflects the level of need in Ipswich and provides a starting point for negotiation where development values may support higher provision.’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF to ensure the policy is justified as an appropriate strategy based on the evidence.
MM57	86	Policy CS13	<p>Amend criterion a of Policy CS13: Planning for Jobs Growth, to read as follows:</p> <p><b>‘POLICY CS13: PLANNING FOR JOBS GROWTH</b></p> <p><b>The Council will promote sustainable economic growth in the Ipswich Strategic Planning Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of approximately 9,500 jobs in the Borough between 2018 and 2036 by:</b></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure that Plan is positively prepared in

			<p>a. allocating a range and choice of sites amounting to at least 23.2ha of land for employment development (in Use Classes <del>B1-E(g)</del>, B2 and B8) through the Site Allocations and Policies (incorporating IP--One Area Action Plan) Development Plan Document. <u>Conditions to prevent changes of use from employment uses to non-employment uses in Use Class E(g) may be applied to permissions where this is necessary and reasonable in line with national policy; ...'</u></p>	<p>meeting employment needs and consistent with national policy in respect of the changes to the UCO in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p>
MM58	87	Paragraph 8.166	<p>Amend Paragraph 8.166 to read as follows:</p> <p>'The Council has updated its economic evidence through joint studies for the Ipswich Economic Area. The Economic Sector Needs Assessment (ESNA) 2017 identifies the amount of land needed for <del>B-class-E(g)</del>, B2 and B8 employment development in the Borough, and the Employment Land Supply Assessment 2018 assesses the quality of employment land within the Borough. The Employment Land Supply Assessment has informed the Strategic Housing and <del>Employment</del> <u>Economic</u> Land Availability Assessment. As a result, some land previously allocated or protected for employment uses has been re-allocated to residential or mixed uses through the Local Plan Review. The Employment Sector Needs Assessment identifies a <u>minimum</u> need for 28.3ha of employment land in Ipswich 2014 to 2036. A pro rata adjustment to update the baseline date to 2018 results in a calculation of <u>at least</u> 23.2ha.'</p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and to reflect the changes to the UCO under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p>
MM59	87	Paragraph 8.169	<p>Amend Paragraph 8.169 to read as follows:</p>	<p>In accordance with the</p>

			<p>'The Economic Strategy for Norfolk and Suffolk has been developed by the New Anglia Local Enterprise Partnership (LEP) and endorsed by the Council. The overall objective of the LEP's strategy is to generate growth across all sectors, focusing on creating high value, highly skilled jobs and industries, whilst also providing the technical skills, access to innovative techniques and support that all businesses and the wider workforce needs to succeed. Ipswich has been identified as one of six 'Priority Places' in the Economic Strategy for Norfolk and Suffolk, as evidence shows there are significant opportunities and commitment for continued growth within the town. The plan sets out key development and investment targets for Ipswich. The high level ambitions set out in the Economic Strategy for Norfolk and Suffolk, <u>as well as the Suffolk Growth Framework</u>, are supported by the Ipswich Borough Council Economic Development Strategy. <u>The ESNA makes clear that the 23.2ha figure is the minimum quantum of land that should be planned for. The ELSA also recognises that higher levels of employment growth could be achieved and that there is a need to plan for a range and choice of sites to meet the needs of different potential employers. Therefore, Policy CS13 takes a positive approach to facilitating employment provision above the minimum identified requirement. The Site Allocations and Policies (incorporating IP-One Area Action Plan) <del>DPD Development Plan Document will translate the overall land requirement into sites achieves this by allocating 28.34ha of land for employment uses.</del> The Council will ensure that enough land is available, including a variety of site sizes and locations to suit different employment-generating activities. Appropriate employment-generating sui generis uses are defined through policy DM33.'</u></p>	<p>requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified as an appropriate strategy.</p>
MM60	88	Paragraph 8.170	<p>Amend Paragraph 8.170 to read as follows:</p> <p>'It should be noted that the jobs growth aspiration covers all sectors and not just the employment use classes of <del>B1 business</del> <u>E(g) (formerly Use Class B1)</u>, B2 general industry and B8 warehousing and distribution.'</p>	<p>To reflect the changes to the UCO under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p>
MM61	88	New Paragraph	<p>Insert two new paragraph after paragraph 170 to read as follows:</p> <p><u>'Under the September 2020 amendments to the Town and Country Planning (Use Classes) Order 1987 (as amended), employment uses that were formally B1 prior to September 2020 are now in the same use class (E) as a wider range of uses, including shops, restaurants and cafes. The employment uses that were formally B1 are identified under part "g" of Use Class E (E(g)). Conditions may be applied on employment</u></p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with</p>

			<p>development that falls within Use Class E(g) to prevent changes of use from Use Class E(g) to other Use Class E uses, where this is necessary to ensure that the Council is able to retain or provide sufficient land for employment development to meet the requirements of the Plan, and, to ensure that the location of main town centre uses complies with the sequential test set out in national policy and does not undermine the vision, objectives and overall strategy of the Local Plan Review. Each application will be judged on its own merits as to whether conditions are reasonable and necessary in each instance.'</p>	<p>national policy in respect of changes to the Use Classes Order and permitted development rights under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p>
MM62	89 - 90	Policy CS14	<p>Amend Policy CS14: Retail Development and Main Town Centre Uses, to read as follows:</p> <p><b>'POLICY CS14: RETAIL DEVELOPMENT AND MAIN TOWN CENTRE USES</b></p> <p><b>The Council will promote high quality investment and development in Ipswich Central Shopping Area, to maintain and enhance its attraction and market share, and strengthen its regional role.</b></p> <p><b>The Council will <u>has</u> allocated land for 10,000 sq.m net of new comparison retail floorspace up to 2031, in accordance with the national requirement to allocate suitable sites in town centres to meet likely need looking at least ten years ahead. This reflects the Ipswich Vision Strategy for the town centre, the scale of housing growth set out in the plan, latest household projections and the most up-to-date evidence and monitoring of market conditions and the changing nature of the high street. The Council will review retail need within five years to ensure that this approach best supports the success of the town centre. The need for convenience floorspace over the same period will be met by the new District Centre at Ipswich Garden Suburb allocated through policy CS10.</b></p> <p><b>In the district centres and local centres, the Council will encourage retail development of a scale appropriate to their size, function and catchment.</b></p> <p><b>Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document, the Council will <u>has</u>:</b></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</p>



			<ul style="list-style-type: none"> <li>• <b>Amended</b> the Central Shopping Area and frontage zones to deliver flexibility;</li> <li>• <b>Strengthened</b> north-south connectivity through the Town Centre; and</li> <li>• <b>Allocated</b> sites within defined centres for retail development.</li> </ul> <p><b>This will enable the delivery of additional floorspace to diversify the retail offer.</b></p> <p><b>The Council will direct other town centre uses including offices, leisure, arts, culture, tourism and hotel developments into the town centre area, with some provision being appropriate in the Central Shopping Area and Waterfront, in recognition of the areas good accessibility by public transport, cycle and foot.</b></p> <p><b>The Council will also promote environmental enhancements and urban greening to the town centre through the Public Realm Strategy Supplementary Planning Document and improved public transport accessibility.'</b></p>	
MM63	90	Paragraph 8.182	<p>Amend Paragraph 8.182 to read as follows:</p> <p>'An amended Central Shopping Area with additional retail site allocations will go some way to addressing these gaps in the offer, subject to general market conditions. Sites <del>will be</del> <u>are</u> allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (policy SP10). In addition to the allocation of sites, the amount of net comparison floorspace proposed takes into account the scale of housing growth set out through policy CS7 and vacant units present in the Central Shopping Area, such as the former British Home Stores building (3,316 sq. m net). Clearly delivery will be the key to success, and the Council will work with others and through its own land holdings and as local planning authority to achieve it. In addition the Council will evaluate the practicalities of improving evening access in the principal pedestrianised streets after normal trading hours, to encourage the use of facilities in the evening.'</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM64	94-95	Policy CS16	<p>Amend Policy CS16: Green Infrastructure, Sport and Recreation, to read as follows:</p> <p><b>'POLICY CS16: GREEN INFRASTRUCTURE, SPORT AND RECREATION</b></p> <p><b>The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, blue corridors, open spaces, <u>and</u> sport and</b></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in

			<p>recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:</p> <ul style="list-style-type: none"> <li>a. requiring all developments to contribute to the provision of open space necessary for that development in accordance with Policy DM6 <del>according to the Borough's standards, identified strategic needs and existing deficits in an area;</del></li> <li>b. requiring major new developments to include usable on-site public open spaces and wildlife habitat. On-site provision must create a network or corridor with existing green infrastructure where such an ecological network or green corridor exists beyond the site boundaries;</li> <li>c. supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities, including water and river-based activities;</li> <li>d. working with partners to prepare, implement and monitor the Recreational Disturbance Avoidance and Mitigation Strategy and other strategies and management plans for green spaces, including an Orwell Country Park management plan, that will result in a reduced impact upon birds in the Orwell Estuary;</li> <li>e. supporting the Greenways Project in working with communities and volunteers to manage green corridors in Ipswich;</li> <li>f. support the enhancement of canopy cover and ecological networks;</li> <li>g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green trail around Ipswich;</li> <li>h. working with strategic partners and developers to ensure the provision of a new country park and visitor centre within the Ipswich Garden Suburb, and an extension to Orwell Country Park;</li> <li>i. promoting improved access to existing facilities where appropriate;</li> <li>j. reviewing the town's estate of sports facilities to consider how they can best meet the needs of a growing population; and</li> <li>k. working with local police and community partners to ensure that appropriate opportunities to design out crime have been taken prior to the commencement of any project and as part of the on-going management of any open spaces, sport or recreational facilities.</li> </ul> <p>Policies in this plan and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document identify existing, new and proposed open spaces, sport and recreation facilities, green corridors and networks and allocate sites for new open spaces and facilities.'</p>	<p>accordance with paragraph 35 of the NPPF.</p>
MM65	97	Paragraph 8.212	Amend paragraph 8.212 to read as follows:	In accordance with the requirement in

			<p>'There are a number of ways to ensure infrastructure delivery through the planning system. The existing system in Ipswich is that of: developer obligations secured in Section 106 Agreements, which cover on- and off-site requirements including affordable housing, open space provision, transport measures, and education provision. However, this system has not adequately picked up more strategic infrastructure impacts or needs. <u>Department for Education have indicated that they are able to forward fund schools in advance of the S106s being signed to assist growth and delivery.</u>'</p>	<p>paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.</p>
MM66	97-98	Policy CS17	<p>Amend Policy CS17: Delivering Infrastructure, to read as follows:</p> <p><b>'POLICY CS17: DELIVERING INFRASTRUCTURE</b></p> <p><b>The Council will require all developments to meet the on- and off-site infrastructure requirements needed to support the development and mitigate the impact of the development on the existing community and environment.</b></p> <p><b><u>Each development will be expected to meet site related infrastructure needs and in order to meet the requirements of Policy CS5 in relation to wider modal shift objectives, development proposals will include off-site works or financial contributions towards delivery of sustainable transport improvements.</u></b></p> <p><b>Where the provision of new, or the improvement or extension of existing, off- site infrastructure is needed to support a new development or mitigate its impacts, and it is not anticipated that the infrastructure will be provided through CIL, the development will be required to contribute proportionately through a Section 106 Agreement commuted sum, or other mechanism as agreed with the Council.</b></p> <p><b>Section 106 Agreements will apply to all major developments and some minor developments but may be varied according to:</b></p> <p><b>a. the scale and nature of the development and its demonstrated viability; and</b></p> <p><b>b. whether or not a planning obligation meets all of the statutory reasons ('tests') for granting planning permission.</b></p> <p><b>The broad categories of infrastructure to be secured or financed from new developments are as follows and detailed further in Appendix 3:</b></p> <p><b>1. highways and transport, <u>including measures to achieve modal shift;</u></b></p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the development needs of the borough.</p>

		<p>2. childcare, early years and education;  3. health <u>including acute care</u> and emergency services;  4. environment and conservation;  5. community and cultural facilities including heritage and archaeology;  6. sport and recreation;  7. economic development; and  8. utilities.</p> <p>Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy include the following (not in priority order):</p> <ul style="list-style-type: none"> <li>· Ipswich flood defences;</li> <li>· sustainable transport measures and accessibility improvements between the Central Shopping Area, Waterfront and railway station;</li> <li>· measures to increase and maximise east-west capacity in the public transport system to ease congestion;</li> <li>· strategic education provision of new schools;</li> <li>· strategic green infrastructure including a country park;</li> <li>· sports and leisure facilities serving the whole Borough;</li> <li>· community facilities including GP surgeries <del>and</del> health centres <u>and key acute inpatient and outpatient facilities</u>;</li> <li>· water management infrastructure;</li> <li>· new primary electricity substation in Turret Lane;</li> <li>· town centre environmental enhancements; and</li> <li>· ultrafast broadband and the opportunity for full fibre broadband to the premises (FTTP).</li> </ul> <p>There are specific requirements linked to the Ipswich Garden Suburb that are identified in the Ipswich Garden Suburb supplementary planning document that has been adopted in advance of any development taking place there.</p> <p>The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Recreational Avoidance and Mitigation Strategy can be addressed and delivered, including for any measures not classified as infrastructure.'</p>	
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MM67	98	Paragraph 8.215	<p>Amend paragraph 8.215 to read as follows:</p> <p>'Growth requirements across the Borough will place additional pressure on existing infrastructure and will therefore require improvements to be made to existing infrastructure. A number of pressures can be relieved through site-specific provision such as open space, <u>and</u> children's play areas <del>and the provision of affordable housing</del>. However, there are other infrastructure improvements and requirements that cannot always be accommodated on-site, or that relate to strategic off-site facilities serving the whole neighbourhood or Borough. It is therefore considered appropriate to pool developer contributions towards off-site provision to help ensure its delivery. Table 8A in Chapter 10 identifies the infrastructure proposals required to support growth. Development may need to be phased to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing arrangement. '</p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, as the provision of affordable housing is not infrastructure.</p>
MM68	101	Policy CS19	<p>Amend Policy CS19: Provision of Health Services, to read as follows:</p> <p><b>'POLICY CS19: PROVISION OF HEALTH SERVICES</b></p> <p><b>The Council safeguards <u>and supports the development of</u> the site of the Heath Road Hospital Campus, <del>which is as defined on the Policies Map</del>, for healthcare and ancillary uses. Ancillary uses may include:</b></p> <ul style="list-style-type: none"> <li>• <b><u>Further inpatient and outpatient accommodation and facilities;</u></b></li> <li>• <b>Staff accommodation;</b></li> <li>• <b>Residential care home;</b></li> <li>• <b>Intermediate facilities;</b></li> <li>• <b>Education and teaching centre; <del>or</del> <u>and</u></b></li> <li>• <b>Therapies centre;</b></li> </ul> <p><b>Proposals for new and improved healthcare and ancillary facilities at <del>the</del> Heath Road Hospital Campus <u>site will be supported, provided that they would not compromise the future delivery of health services at the site. This would be demonstrated through proposals being accompanied by a detailed master plan</u></b></p>	<p>For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared to meet the development and infrastructure needs of the borough and In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be</p>

			<p><b>and a medium to long term strategy for healthcare provision at the site that includes a satisfactory travel plan and measures to address associated local car parking issues.</b></p> <p><b>Proposals to develop additional, new, extended or relocated local health facilities such as GP surgeries will be supported provided that they are located in or adjacent to the town centre or a district or local centre. Exceptions will only be permitted where the applicant can demonstrate to the Council's satisfaction that the location would be fully accessible by sustainable modes of transport, and would serve the patients or fill a gap in existing provision more effectively than any other better located and realistically available site.</b></p>	clear and unambiguous .
MM69	101	Paragraph 8.229	<p>Amend paragraph 8.229 to read as follows:</p> <p>‘The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. <u>The policy allows for a range of healthcare and ancillary uses, including staff support services to assist with recruitment and retention. Additional ancillary uses may also include shared facilities to deliver mutual benefit to other public sector organisations aligned with the one public estate agenda.</u> Decisions on changes to acute care provision need to be considered in the context of their health impact, in particular the community's ability to access services appropriately and in a timely fashion.’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.
MM70	101	Paragraph 8.230	<p>Amend paragraph 8.230 to read as follows:</p> <p>‘It is also essential that the travel implications <u>of hospital related developments</u> are fully considered and measures put in place to encourage the use of sustainable modes where possible by staff, out-patients, and visitors. In particular, measures should tackle existing parking issues in surrounding residential areas associated with Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving <u>to be</u> effective.’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.

MM71	104	Paragraph 8.240	<p>Amend paragraph 8.240 to read as follows:</p> <p><u>'Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board and be agreed by each respective local planning authority.'</u></p>	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous and for soundness to ensure the Plan is effective in dealing with cross-boundary strategic matters.
MM72	105	Paragraph 8.247	<p>Amend paragraph 8.247 to read as follows:</p> <p><u>'At a minimum, a road bridge from the west bank to the island site and a pedestrian and cycle bridge across the Wet Dock lock gates to the east bank will be required to enable any significant development on the island. The requirement for these to be bridges for motor vehicles or for sustainable travel will be determined when the site comes forward taking into account the detail of the development application and the extent of modal shift across the town. The £10.8m Suffolk County Council reserved to help support this as a contribution is reflected in the ISPA SoCG Iteration 6.'</u></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.
MM73	105	Paragraph 8.249	<p>Amend paragraph 8.249 to read as follows:</p> <p><u>'This alternative capacity will need to be addressed to enable the successful regeneration of the Island Site at Ipswich Waterfront which will require an additional crossing of the River Orwell. Whilst the delivery of a single span main bridge, which would have provided additional highway capacity, cannot now proceed, the County Council will contribute a maximum of £10.8m to help to deliver crossings to serve the Waterfront</u></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and

			<p>and deliver on Ipswich Local Plan regeneration objectives. <del>Could also be provided via a northern bypass or a link road to the north of the town.</del> The Council supports the work of key partners to investigate the possibility of a northern bypass, to address the issue of:</p> <ul style="list-style-type: none"> <li>i. central east west movement;</li> <li>ii. movements within and around the north of Ipswich; and</li> <li>iii. the capacity of the A14, particularly around the Orwell Bridge.' </li></ul>	unambiguous and for soundness in accordance with paragraph 35 of the NPPF.
MM74	105 – 106	Paragraph 8.250	<p>Delete paragraph 8.250 in its entirety as follows:</p> <p><del>'The Council will work with neighbouring authorities and Suffolk County Council to ensure that the merits and delivery options for some form of northern bypass are fully investigated. It is recognised that any such route would be within the East Suffolk Council and Mid-Suffolk District Council areas (i.e. not between the Ipswich Garden Suburb policy CS10 and Westerfield village) and therefore it is not practical to include such a route within this Strategy. However, the Council will encourage those authorities, together with Suffolk County Council and other interested parties, to actively investigate such a route, and would be prepared to contribute to any such investigation. Public consultation into possible routes for such a road has taken place.'</del></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with cross-boundary strategic matters.
MM75	108	Policy DM1	<p>Amend Policy DM1: Sustainable Construction, to read as follows:</p> <p><b>'POLICY DM1: Sustainable Construction</b></p> <p><b>New residential development will be required to meet a high standard of environmental sustainability. The following standards should be achieved as a minimum unless, in exceptional circumstances, it can be clearly demonstrated that this is either not feasible or not viable:</b></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.



			<p>a) <del>CO2 emissions of A 19% improvement in the reduction of CO2 emissions above</del> <u>below</u> the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations (Part L); and</p> <p>b) The water efficiency standards of 110 litres/person/day as set out in Requirement G2, Part G of Schedule 1 and regulation 36 to the Building Regulations 2010, as amended.</p> <p>Development will also be expected to incorporate sustainable drainage and water efficiency measures as required by DM4. Surface water should be managed as close to its source as possible. This will mean the use of Sustainable <del>Urban</del> Drainage systems including measures such as green or blue roofs, soakaways and permeable paving.</p> <p>The Council will also encourage non-residential development of 500 sq m and above to achieve a minimum of BREEAM Very Good standard or equivalent.'</p>	
MM76	110	Policy DM2	<p>Amend Policy DM2 to read as follows:</p> <p><b>POLICY DM2: Decentralised Renewable or Low Carbon Energy</b></p> <p>All new build development of <del>more than 10 or more</del> dwellings or in excess of 1,000 sq. m of other residential or non-residential floorspace shall provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources. Only if it can be clearly demonstrated that this would not be technically feasible or financially viable, then the alternative of reduced provision and/or equivalent carbon reduction in the form of additional energy efficiency measures will be required. The design of development should allow for the development of feed in tariffs.</p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy as set out in the March 2015 Written Ministerial Statement.
MM77	111	Paragraph 9.3.1	<p>Amend Paragraph 9.3.1 to read as follows:</p> <p>'The focus of Policy DM3 is to mitigate the impact of development on air quality and to ensure exposure to poor air quality is reduced in the Borough, <u>to contribute towards achieving compliance with air quality limit values for pollutants.</u>'</p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.
MM78	113	Policy DM4	<p>Amend POLICY DM4: Development and Flood Risk, to read as follows:</p> <p><b>'POLICY DM4: Development and Flood Risk</b></p>	In accordance with the requirement in paragraph 16(d)

		<p>Development will only be approved where it can be demonstrated that the proposal satisfies all the following criteria:</p> <p><b><u>a. the sequential test set out in national policy is met, other than on allocated sites where the sequential test will not need to be repeated for uses consistent with the allocation;</u></b></p> <p><b><u>b. if it is not possible for the development to be located in a zone at lower risk of flooding, that the sustainability benefits would outweigh the flood risk and the development will remain safe for people for its lifetime;</u></b></p> <p><b><u>ac. it <del>does</del> will not increase the overall risk of all forms of flooding in the area or elsewhere, through the mitigation of flood risk in the layout, design and form of the development and <del>wherever practicable</del> the appropriate application of Sustainable Drainage Systems (SuDS);</u></b></p> <p><b><u>bd. that no surface water connections are made to the foul system and connections to the combined or surface water system <del>is</del>are only made in exceptional circumstances where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments);</u></b></p> <p><b><u>ce. that adequate sewage treatment capacity and foul drainage already exists or can be provided in time to serve the development;</u></b></p> <p><b><u>df. it will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy;</u></b></p> <p><b><u>e. It is and will remain safe for people for the lifetime of the development; and</u></b> <b><u>and</u></b></p> <p><b><u>f.g. it includes water efficiency measures such as water re-use, stormwater or rainwater harvesting, or use of local land drainage water <del>where practicable</del>;</u></b> <b><u>and</u></b></p> <p><b><u>g.h. it does not have any adverse effect on European and Nationally designated sites in terms of surface water disposal.</u></b></p> <p><b><u>Applications should be supported by site-specific flood risk assessments as required.</u></b></p> <p><b><u>The Development and Flood Risk Supplementary Planning Document provides relevant guidance on what constitutes safe development.'</u></b></p>	<p>of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.</p>
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MM79	114	Paragraph 9.4.5	<p>Amend paragraph 9.4.5 to read as follows:</p> <p>'SuDS are an important method of reducing flood risk associated with development and are an essential element of any development in the Borough <del>wherever practicable</del>. Layout and form of buildings and roads must be designed around SuDS bearing in mind SuDS should be sited in lower areas, but preferably close to source, making use of topography. SuDS on contaminated land should be lined and designed to attenuate water on or near the surface.'</p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.</p>
MM80	115	Paragraph 9.4.6	<p>Amend paragraph 9.4.6 to read as follows:</p> <p>'The preferred method of surface water disposal is through the use of SuDS. In new development and redevelopment, surface water connections to the foul system and to the combined or surface water system should only be made in exceptional circumstances where it can be adequately demonstrated that there are no feasible alternatives. It is also important that there is existing sewage treatment capacity and foul drainage exists or that it is capable of being included in time to serve standards <del>where practicable</del>. This will be agreed in consultation with the relevant water and sewerage undertakers.'</p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.</p>
MM81	115	Paragraph 9.4.9	<p>Amend paragraph 9.4.9 to read as follows:</p> <p>'SuDS standards and policies are <del>currently set out in the Council's Drainage and Flood Defence Policy as referred to in the Development and Flood Risk SPD</del>. In terms of surface water flooding and drainage, the adopted standards specified in criterion <del>bc</del> are the minimum standards set out in the Suffolk Flood Risk Management Strategy (Appendix A). The adopted standards for fluvial and tidal flooding as set out in the Development and Flood Risk SPD will also need to be met. <del>In the future it is expected that National Standards will be followed.</del></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</p>

MM82	115	Paragraph 9.4.10	<p>Amend paragraph 9.4.10 to read as follows:</p> <p><u>'The Council's Level 2 SFRA October 2020 provides information relevant to both the existing tidal and fluvial defences at 20192011 and also to the completed defences, with the proposed new Ipswich tidal flood barrier and defence improvements in place. In each case the SFRA provides data on residual tidal flood risks and actual fluvial flood risks taking account of flood depth, velocity and the velocity hazard rating of floodwater. The preparation of many site-specific FRAs can make use of mapped risks from the new SFRA. The SFRA is a living document subject to periodic update. However, in some instances, site-specific FRAs will still need to include detailed flood modelling to ascertain the flood risk. In the interim, until the new Development and Flood Risk SPD is adopted, applicants are referred to the new evidence, which is available through the refresh of the SFRA, when assessing flood risk over their development's lifetime and designing any flood risk mitigation required to ensure that their development will be safe.'</u></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on proportionate evidence.</p>
MM83	117	Policy DM5	<p>Amend Policy DM5: Protection of Open Spaces, Sport and Recreation as follows:</p> <p><b><u>Policy DM5: Protection of Open Spaces, Sport and Recreation Facilities</u></b></p> <p><b>Development involving the loss of open space, sports or recreation facilities, will only be permitted if:</b></p> <ul style="list-style-type: none"> <li><b>a) the site or facility is surplus in terms of all the functions an open space can perform, and is of low value, poor quality and there is no longer a local demand for this type of open space or facility, as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) and subsequent update; or</b></li> <li><b>b) alternative and improved provision would be made in a location well related to the users of the existing facility; or</b></li> <li><b>c) the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.</b></li> </ul>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.</p>

			<b><u>The open space, sports and recreational facilities protected by this policy include all the different types shown on the Policies Map including playing fields, allotments and country park.'</u></b>	
MM84	123	Policy DM8	<p>Amend Policy DM8: The Natural Environment, to read as follows:</p> <p><b>'POLICY DM8: The Natural Environment</b>  <b>All development must incorporate measures to provide net gains for biodiversity. Proposals which would result in significant harm or net loss to biodiversity, having appropriate regard to the 'mitigation hierarchy', will not normally be permitted.</b></p> <p><b><u>Sites of International and National Importance</u></b>  <b>Proposals which would have an adverse impact on European protected sites will not be permitted, either alone or in combination with other proposals, unless imperative reasons of overriding public interest exist in accordance with the provisions of the European Habitats Directive.</b></p> <p><b>Sites of Special Scientific Interest (SSSI) will be protected from development, which directly or indirectly would have an adverse effect on their natural value. An exception will only be made where a proposed development:</b></p> <p><b>a. could not be located on an alternative site that would cause less harm;</b>  <b>b. would deliver benefits that clearly outweigh the impacts on the site's special interest and on the national network of such sites; and</b>  <b>c. would compensate for the loss of natural capital.</b></p> <p><b><u>Any development with the potential to impact on a Special Protection Area, or Special Area for Conservation or Ramsar site within the Borough will need to be supported by information to inform a Habitats Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions).</u></b></p> <p><b><u>Financial contributions will be secured in relation to the avoidance and mitigation of impacts of increased recreation, to contribute towards the provision of strategic mitigation as established through the Recreational Disturbance Avoidance and Mitigation Strategy.</u></b></p> <p><b><u>Where mitigation is proposed to be provided through alternative mechanisms, applicants will need to provide evidence to demonstrate that all impacts are mitigated, including in-combination effects.</u></b></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.

			<p><b><u>Depending on the size and location of the development, additional measures such as Suitable Alternative Natural Greenspaces (SANGS) may be required as part of development proposals.'</u></b></p> <p><b><u>Local Nature Reserves and County Wildlife Sites</u></b>  <b>Planning permission will not be granted for development that would result in damage or loss in extent or otherwise have a significant adverse effect on: <del>{locally designated County Wildlife Sites and geological sites}</del>; Local Nature Reserves; or Local <u>Wildlife Sites</u>, <del>unless</del> the harm cannot be avoided, adequately mitigated, or, as a last resort, compensated for. <del>mitigated by appropriate measures.</del></b>  <b>Enhancements for protected sites will be required from new development.</b></p> <p><b><u>Priority Habitats and Species</u></b>  <b>Development which could harm, directly or indirectly, species, which are legally protected, or species and habitats that have been identified as Species or Habitats of Principal Importance in England (also known as Section 41 or 'Priority' species and habitats) will not be permitted unless the harm can be avoided or mitigated by appropriate measures.</b></p> <p><b>Development must include enhancements for protected and priority species as part of their design and implementation.</b></p> <p><b><u>Enhancing Ecological Networks</u></b>  <b>The Council will enhance the ecological network across the Borough as identified on Plan 5. The designated sites are ranked 1 and 2 High Conservation Value. Within the remaining core areas of the ecological network and the corridors which link them, development proposals will be required to have regard to existing habitat features and the wildlife corridor function, through their design and layout, and achieve net biodiversity gains commensurate with the scale of the proposal, through measures such as retaining existing habitat features, habitat restoration or re-creation and comprehensive landscaping, which is appropriate to local wildlife. Development which that would fragment the corridor function will not be permitted unless there is adequate mitigation.</b></p> <p><b>Within the buffer zones around core areas and corridors, development will be required to enhance the ecological network, through measures such as wildlife beneficial landscaping.'</b></p>	
MM85	124	Paragraph 9.8.2	Amend and divide paragraph 9.8.2 to read as follows:	In accordance with the

		<p>'European sites include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These sites are protected under the Birds and Habitats Directive (92/43/EEC). The Stour and Orwell Estuaries SPA and Ramsar site lies partly within Ipswich Borough. Policy ISPA3 (Cross-boundary mitigation of effects on Protected Habitats and Species) sets out the Council's approach to working with other authorities and stakeholders to address the requirement of the Recreational Avoidance and Mitigation Strategy and implementation of mitigation measures across the Ipswich Strategic Planning Area. Listed or proposed Ramsar sites, potential SPAs and possible SACs and sites required in relation to compensatory measures for adverse effects on European sites are afforded the same level of protection as SACs and SPAs through the NPPF.</p> <p>The Conservation of Habitats and Species Regulations 2017 (as amended) set out requirements in relation to assessing projects that could potentially affect a European site. Where a significant effect on a European site cannot be ruled out, proposals will need to be accompanied by an Appropriate Assessment. The assessment should be carried out in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). Where the assessment concludes negative effects on a site's integrity, permission should only be granted where there are no alternative solutions and where the project must proceed due to imperative reasons of over-riding public interest.</p> <p>The source-pathway-receptor model will be used to assess the effects of proposed development on European sites. 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 <u>through the RAMS Strategy and</u>. In some instances, <del>developer contributions may be sought in relation to these and/or additional mitigation measures identified through assessments at planning application stage</del> <u>schemes may need to incorporate measures in addition to a RAMS contribution which may include the provision of SANG. In such circumstances, measures should be identified through assessments at the planning application stage in accordance with the Borough Council's RAMS Supplementary Planning Document. The RAMS SPD reflects the Council's joint approach to securing mitigation allowable through the 2017 Regulations. Mitigation is a legal requirement.'</u></p>	<p>requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with cross-boundary strategic matters.</p>
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MM86	129	Policy DM10	<p>Amend Policy DM10: Green Corridors, to read as follows:</p> <p><b>'POLICY DM10: Green <u>and Blue</u> Corridors</b></p> <p><b>The Council will seek to establish and enhance green <u>and blue</u> corridors within the Borough and linking to adjacent open spaces and walking, cycling or riding routes.</b></p> <p><b>Green corridors are identified broadly on Plan 6 in the following locations:</b></p> <ul style="list-style-type: none"> <li>a. <b>Between Bramford Lane Allotments and Whitton Sports Centre playing fields and grounds, Whitton Church Lane and adjoining countryside;</b></li> <li>b. <b>Between Christchurch Park, the Dales, playing fields north of Whitton Church Lane and adjacent countryside;</b></li> <li>c. <b>Between Christchurch Park, the Fonnereau Way, green infrastructure within the Ipswich Garden Suburb development area and open countryside beyond;</b></li> <li>d. <b>Between the Cemetery, Playing Fields at Tuddenham Road and adjacent countryside;</b></li> <li>e. <b>Between Woodbridge Road and Bixley Heath via St Clement's Hospital grounds;</b></li> <li>f. <b>Between Alexandra Park and Orwell Country Park and surrounding countryside via Holywells Park, Landseer Park and Pipers Vale;</b></li> <li>g. <b>Between the Gipping Valley path near Station Bridge and Belstead Brook Park and adjacent countryside via Bourne Park; <u>and</u></b></li> <li>h. <b>Between Gippeswyk Park, Belstead Brook Park and adjoining countryside;</b></li> <li>i. <b>Between Gippeswyk Park, Chantry Park and adjacent countryside; and</b></li> </ul> <p><b><u>The blue corridor is identified broadly on Plan 6 in the following location:</u></b></p> <ul style="list-style-type: none"> <li>j. <b>Between the Wet Dock and Sroughton Millennium Green and adjacent countryside along the river corridor.</b></li> </ul> <p><b>Development within the green <u>and blue</u> corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions. The Council will seek to establish attractive green links and to provide for public access wherever safe and practicable.</b></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</p>
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			<p>Opportunities will be sought to link existing <u>green and blue corridors</u> into a more continuous network through the layout of new development, the provision of new open spaces or public realm improvement. Development proposals which break or disrupt an existing corridor without being able to form an acceptable and useable alternative route in the network will be refused.</p> <p>A further “blue” corridor <u>(j)</u> can be identified, comprising the length of the navigable River Gipping and River Orwell within the Borough. Development proposals which relate closely to river banks will be required to provide for the improvement of public pedestrian and cycle paths along the site boundary relating to the river where appropriate and should enhance its appearance. Development close to river banks should also include tree planting and ensure that an appropriately sized ecological buffer along the river is maintained. Development should seek to enhance public slipway access to the river, where practicable.</p> <p>The Council will seek to establish and extend a publicly accessible green trail around the edge of the Borough as illustrated on Plan 6 in order to address the need within the Borough for access to Natural and Semi Natural Greenspace. The green trail will provide an ecological corridor and a recreational resource for people to use. Development at the edge of the built up area will be required to provide links within the green trail as part of their on-site open space provision.’</p>	
MM87	130	Paragraph 9.10.6	<p>Amend paragraph 9.10.6 to read as follows:</p> <p>‘Ipswich benefits from an important and continuous <del>green</del> <u>blue</u> corridor in the form of the river path which follows the river from the Waterfront westwards through to Sproughton. Enhancing the river path is a key aim of the Ipswich River Strategy. The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document proposes pedestrian and cycle bridges across the river to link up communities and facilities north and south of the river in the vicinity of Elton park, and east of Stoke Bridge. In order to maintain an appropriate ecological buffer along the river, <del>no development should take place within 10m of the river.</del> Development taking place within <u>10m of the river</u> this buffer zone will only be permitted if it can be clearly demonstrated that it would maintain or enhance the ecological quality of the river corridor.’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM88	131	Policy DM11	<p>Amend Policy DM11: Countryside, to read as follows:</p> <p style="text-align: center;"><b>‘POLICY DM11: Countryside</b></p>	In accordance with the requirement in

			<p><b>Within the countryside defined on the Policies Map, development will only be permitted if it:</b></p> <ul style="list-style-type: none"> <li><b>a. respects the character of the countryside; and</b></li> <li><b>b. maintains separation between Ipswich and surrounding settlements; and</b></li> <li><b>c. does not result in isolated dwellings; and</b></li> <li><b>d. contributes to the green trail and other strategic walking and cycling routes and wildlife corridors where appropriate.</b></li> </ul> <p><b>Major development in the countryside will only be permitted if it satisfies a. to d. above and:</b></p> <ul style="list-style-type: none"> <li><b>ia. is necessary to support a sustainable rural business including tourism; or</b></li> <li><b>ii. is a recreational use of land which retains its open character; or</b></li> <li><b>iii. is major residential development.</b></li> </ul> <p><b>In the case of the AONB, major development, as defined by NPPF footnote 55, will only be permitted in exceptional circumstances in accordance with NPPF paragraph 172. The natural beauty, landscape and special qualities of the AONB <u>and the contribution that land within its setting makes to this should be conserved and enhanced.</u></b></p>	<p>paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.</p>
MM89	131	Paragraph 9.11.3	<p>Amend paragraph 9.11.3 to read as follows:</p> <p><u>'Ipswich also contains a small area of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) on the southern boundary of the Borough. Paragraph 172 of the NPPF sets out the approach to considering applications for development and major development applications within the AONB in paragraph 172. The definition of major development in respect of development within the AONB is defined by footnote 55 of the NPPF and is matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. Land within the setting of the AONB also makes an important contribution to the natural beauty of the area. Development which is poorly located or designed can pose significant harm to the AONB. Therefore, development within the setting of the AONB must also take into account the potential impacts on the natural beauty of the area.'</u></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.</p>
MM90	133	Policy DM12	<p>Amend Policy DM12: Design and Character, to read as follows:</p>	<p>For soundness in accordance with</p>

		<p><b>'POLICY DM12: Design and Character</b></p> <p><b>The Council will require all new development to be well-designed and sustainable. In the plan area this will mean layouts and designs that provide a safe, and attractive public realm capable of being used by all. They will:</b></p> <ul style="list-style-type: none"> <li><b>a. Form areas which function well by integrating residential, working and community environments and which fit well with adjoining areas;</b></li> <li><b>b. create safe and secure communities by complying with the relevant secure by design guidance where appropriate to do so <u>and taking account of building safety requirements under other legislation from the outset, including fire safety, access for emergency services and safe access for evacuation;</u></b></li> <li><b>c. include useable public spaces for all (including pedestrians, cyclists and people with disabilities) that are easily understood and easy to pass through;</b></li> <li><b>d. introduce greener streets and spaces to contribute to local biodiversity net gain, visual amenity, and health and well-being, and offset the impacts of climate change; <u>This could include green roofs, walls and other measures to ensure the urban environment becomes greener and healthier;</u></b></li> <li><b>e. incorporate cycle and waste storage, public transport infrastructure and car parking (including electric vehicles) if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity and allows sufficient permeability for public transport, refuse collection and emergency vehicles;</b></li> <li><b>f. in residential development of 10 or more dwellings, 25% of new dwellings will be required to be built to Building Regulations standard M4(2). 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.</b></li> </ul> <p><b>Proposals should also respect and promote the special character and local distinctiveness of Ipswich by:</b></p>	<p>paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.</p>
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			<p><b>g. protecting and enhancing significant views that are considered to be important or worthy of protection, including those set out in the Ipswich Urban Character Studies, Conservation Area Appraisal and Management Plans, as well as the setting of any heritage assets. The design should help to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene;</b></p> <p><b>h. ensuring good public realm design that enhances the streetscape and protects and reinforces a sense of place, through the appropriate use of public art, bespoke paving, street furniture and soft landscaping; and</b></p> <p><b>i. ensuring good architectural design that responds to and reflects its setting, is sustainable, accessible and designed for long life by being capable of adaptation to changing needs and uses over time and demonstrate the principles of dementia-friendly design.</b></p> <p><b>Designs that do not adequately meet or address these criteria will be refused.'</b></p>	
MM91	135	New Paragraph	<p>Insert a new paragraph after paragraph 9.12.8 to read as follows:</p> <p><u>'The NPPF states that planning policies should promote public safety by ensuring appropriate and proportionate steps are taken to reduce vulnerability, increase resilience and ensure public safety and security. Although the subject of fire safety is covered by part B of the Building Regulations, it is important that proposals achieve the highest standards of fire safety, reducing risk to life, providing acceptable means of escape and ensuring that risk to life is as low as possible. To achieve this, applicants should consider building safety requirements under the Building Regulations and other legislation from the outset to provide a safe and secure environment for occupants and users, including whether the building materials (e.g. cladding) are suitable and that built-in emergency responses to fire, such as sprinkler systems, are accounted for.'</u></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.
MM92	135	Paragraph 9.12.13	<p>Amend Paragraph 9.12.13 to read as follows:</p> <p><del>'Criterion f. i. of the policy seeks to secure well-designed, adaptable and resilient places in accordance with the National Planning Policy Framework, Section 12 Planning Practice Guidance paragraphs 015 and 019</del></p>	To reflect changes in national policy and guidance.

			(Reference ID: 26-019-20140306). Assessment of design quality for major applications for residential development will be made using the Building for Life 12 criteria (CABE at the Design Council / Design for Homes / HBF) and applicants will be expected to demonstrate that scheme designs can achieve a 'green' score in each category enabling schemes to be eligible for 'Building for Life Diamond' status. However it is recognised that not every development proposal will meet this criteria and in these circumstances developers will be expected to justify why this is not possible. The Building for Life criteria are reflected in policy DM12 and therefore addressing the specific requirements of Building for Life will contribute towards meeting the requirements of policy DM12. The criteria in policy DM12 also contribute towards the creation of safe, functional and well-designed communities as aspired to by the Government's Lifetime Neighbourhoods ambitions.'	
MM93	137-138	Policy DM13	<p>Amend Policy DM13: Built Heritage and Conservation, to read as follows:</p> <p><b>'POLICY DM13: Built Heritage and Conservation</b></p> <p><b>Proposals for new development must consider the impacts on the historic built environment which makes Ipswich such a distinctive town, seek opportunities for enhancement of the town's heritage, and respond to the historic pattern of development and character of the area and comply with the requirements of the NPPF.</b></p> <p><b><u>Designated Heritage Assets</u></b></p> <p><b><u>The Council will refuse consent for development that will lead to substantial harm to (or total loss of significance of) a designated heritage asset, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</u></b></p> <ul style="list-style-type: none"> <li>a) <b><u>the nature of the heritage asset prevents all reasonable uses of the site;</u></b></li> <li>b) <b><u>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;</u></b></li> <li>c) <b><u>conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</u></b></li> <li>d) <b><u>the harm or loss is outweighed by the benefit of bringing the site back into use.</u></b></li> </ul>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.

		<p><u>Substantial harm to grade II listed buildings or grade II parks and gardens will only be permitted in exceptional circumstances. Substantial harm to assets of the highest significance, such as grade I and II* listed buildings; grade II* parks and gardens and scheduled monuments will only be permitted in wholly exceptional circumstances.</u></p> <p><u>Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</u></p> <p><u>Listed Buildings</u></p> <p>To preserve and enhance the Borough’s 600+ listed buildings, the Council will:</p> <ul style="list-style-type: none"> <li>a) support proposals for alterations and extensions to listed buildings where there would be no harm to the special architectural and historic interest of the building. This will consider the design, scale, materials and appearance with regard to the significance of the listed building;</li> <li>b) support proposals for the change of use of a listed building where the use will retain elements of the building which contribute to the building’s significance, including internal features, historic fabric, plan form, appearance and layout; <u>and</u></li> <li>c) support development within the setting of listed buildings that would not cause harm to the significance of the building through the introduction of sympathetic development in the building’s setting, retaining a curtilage appropriate to the listed building; <u>and</u></li> <li><del>d) only in exceptional circumstances grant listed building consent for the total or substantial demolition of a listed building;</del></li> </ul> <p><u>Conservation Areas</u></p> <p>The adopted Conservation Area Appraisals and Management Plans for the Borough’s 15 Conservation Areas will be used to inform the Council’s decisions when assessing the impact of proposals.</p> <p>The Council will:</p>	
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		<ul style="list-style-type: none"> <li>• require development within conservation areas to protect and enhance the special interest, character and appearance of the area and its setting;</li> <li>• require the position, mass, layout, appearance and materials of proposed development, and the design of the space and landscaping around it, to pay regard to the character of adjoining buildings and the area as a whole;</li> <li>• ensure that proposed changes of use within or adjacent to conservation areas would not detract from the special interest, character and appearance of the designated area, which should include sympathetic alterations and additions to facades that are visible from the public domain and the retention of any existing features of special architectural merit;</li> <li>• preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which contribute to the significance of the area by being located in the setting of the conservation area; <del>and</del></li> <li><del>• only in exceptional circumstances grant permission for the total or substantial demolition of an unlisted building that makes a positive contribution to the special interest and significance of a conservation area; and</del></li> <li>• Consider the withdrawal of permitted development rights <u>through the use of conditions where this is justified to preserve</u> <del>they present a threat to the protection of</del> the character and <u>appearance</u> <del>special interest</del> of the conservation area.</li> </ul> <p><u>Non-designated heritage assets</u></p> <p>The Council will also protect non-designated heritage assets. <del>In weighing the effect of a proposal on the significance of a non-designated heritage asset, a balanced judgement will be weighed against applied having regard to the public benefits of the proposal, balancing the scale of any harm or loss and against the significance of the heritage asset.</del></p> <p>Adopted Conservation Area Appraisals and Management Plans; the Development and Archaeology SPD <del>(2019)</del>; Ipswich Urban Character SPD (to identify the special character and distinctiveness of Ipswich in relation to the proposal); the Local List (Buildings of Townscape Interest) SPD; Space and Design Guidelines SPD; the Shop Front Design Guide; and the Public Realm SPD as appropriate, will be used to inform the Council’s planning decisions to proposals subject to this policy.</p> <p>Where a proposal involves directly, is adjacent to or affects the setting of a heritage asset, the developer</p>	
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			<p><b>must submit a heritage statement proportional to the heritage asset status.</b></p> <p><b>Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated assets.</b></p> <p><b>The Council will also protect non-designated heritage assets included on the ‘Local List’.</b></p> <p><b>The Council shall have regard to the effect of cumulative harm to heritage assets, refusing applications where previous development has been found to be harmful to the historic environment.</b></p> <p><b>Planning applications involving archaeology will also be subject to DM14.’</b></p>	
MM94	144	Paragraph 9.14.5	<p>Amend paragraph 9.14.5 to read as follows:</p> <p>‘Suffolk County Council Archaeology Service holds the Urban Archaeological Database for Ipswich and is consulted on planning applications that could affect archaeology. <del>Historic England administers the Scheduled Monument Consent process and should be consulted on any proposed works.</del> Early consultation with relevant agencies is encouraged well in advance of seeking relevant permissions and consents, in order that appropriate consideration is given to heritage assets. This makes the application process simpler and reduces the risk for proposed schemes. Understanding the significance of affected assets is important to the process. The ability to document an asset is not a factor in determining a planning application. However, where permission is granted subject to conditions relating to archaeological remains, an appropriate programme of work to record and promote understanding of remains which would be affected by development could include some or all of the following: further evaluation, upfront excavation, and/or monitoring and control of contractor’s groundworks, with appropriate curation and publication of results. The Development and Archaeology Supplementary Planning Document (SPD) is intended to help applicants make successful applications and provides further detail on procedures and best practice.’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM95	144	New Paragraph	<p>Insert a new paragraph after paragraph 9.14.6 to read as follows:</p>	In accordance with the requirement in



			<p><u>'A number of the sites within Opportunity Areas B and C in the IP-One Area Action Plan, contain scheduled monuments. Any development proposals directly affecting scheduled monuments will need to minimise and justify any harm to the monument and demonstrate a very high level of public benefit in order for them to meet the requirements of NPPF paragraphs 194, 195 and/or 196. Where a proposed development will impact on a scheduled monument, detailed early pre-application discussions with Suffolk County Council Archaeological Service and Historic England are essential to agree the scope of required further assessment, the principle of development and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). In addition to planning permission, proposals affecting scheduled monuments will also require Scheduled Monument Consent (SMC) under the Ancient Monuments and Archaeological Areas Act 1979 (as amended). SMC is a legal requirement for any development which might directly affect a monument either above or below ground level. Historic England administers the SMC application process on behalf of the Secretary of State for Digital, Culture, Media and Sport and should be consulted at the earliest opportunity to discuss the nature of the development. SMC is a separate process from the planning system. In order for development proposals affecting scheduled monuments to obtain Scheduled Monument Consent they will need to demonstrate that they would deliver a very high level of public benefit.'</u></p>	<p>paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.</p>
MM96	145	Policy DM15	<p>Amend Policy DM15: Tall Buildings, to read as follows:</p> <p><b>'POLICY DM15: Tall Buildings</b></p> <p><b>Planning permission for tall buildings will be granted within the arc of land to the south-west of the town centre in the vicinity of Civic Drive and the Northern Quays of the Waterfront, as shown on the IP-One Area Inset Policies Map, providing that the design of any proposed building satisfactorily addresses all of the following criteria:</b></p> <ol style="list-style-type: none"> <li><b>a. Respects local character and context, including heritage assets;</b></li> <li><b>b. achievesing a building that is of the highest architectural quality;</b></li> <li><b>c. is sustainable in design and construction and ensures the public safety, including fire safety, of all building users;</b></li> <li><b>d. the design is credible in technical and financial terms;</b></li> <li><b>e. makes a positive contribution to public space and facilities;</b></li> </ol>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective and</p>

			<ul style="list-style-type: none"> <li>f. does not negatively impact on the local microclimate;</li> <li>g. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;</li> <li>h. provides a well planned external and internal environment;</li> <li>i. preserves strategic and local views, with particular reference to conservation areas, listed buildings, <u>scheduled monuments</u> and other heritage assets, <u>and their settings</u> and the wooded skyline visible from and towards central Ipswich; and</li> <li>j. is carefully designed to avoid refraction of light off external glass surfaces.</li> </ul> <p>In other locations within the Borough proposals for tall buildings may exceptionally be considered to be appropriate if it can be demonstrated satisfactorily that they satisfy criteria a. to j. of the policy and would not harm the character and appearance of the area.'</p>	consistent with national policy.
MM97	149	Policy DM17	<p>Amend Policy DM17: Small Scale Infill and Backland Residential Developments, to read as follows:</p> <p><b>'POLICY DM17: Small Scale Infill and Backland Residential Developments</b></p> <p>Proposals for small scale residential development involving infill, backland or severance plots will not be permitted unless the development:</p> <ul style="list-style-type: none"> <li>a. is sited in a location where it would not be disturbed by or disturb other land uses;</li> <li>b. protects the setting of existing buildings and the character and appearance of the area;</li> <li>c. allows the retention of a reasonably sized garden, in accordance with the provision set out in policy DM7;</li> <li>d. protects existing habitats and biodiversity in accordance with policy DM8;</li> <li>e. does not cause unacceptable loss of amenity to neighbouring residents having regard to noise and vibration, sunlight, daylight, outlook, overshadowing, light pollution/ spillage, privacy/ overlooking and sense of enclosure;</li> <li>f. provides a suitable level of amenity for future occupiers;</li> <li>g. has safe and convenient access;</li> <li>h. meets the Council's parking standards and would not lead to an unacceptable loss of parking serving existing dwellings; and</li> <li>i. has secure and lit bicycle storage and external storage for recycling, organic waste and non-recyclable waste.' </li></ul>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and effective.

MM98	150	Policy DM18	<p>Amend Policy DM18: Amenity, to read as follows:</p> <p><b>'POLICY DM18: Amenity</b></p> <p><b>The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not result in an unacceptable loss of amenity. Exceptions will only be made where satisfactory mitigation measures can be secured. The factors we will consider include:</b></p> <ul style="list-style-type: none"> <li>• <del>visual privacy and overlooking</del></li> <li>• <b>overbearing impact and sense of enclosure;</b></li> <li>• <b>sunlight, daylight, overshadowing and artificial light levels;</b></li> <li>• <b>noise and vibration levels;</b></li> <li>• <b>odour, fumes, dust and ventilation;</b></li> <li>• <b>contamination; and</b></li> <li>• <b><u>visual privacy and overlooking.</u></b></li> </ul> <p><b><u>Minimum privacy distances</u></b></p> <table border="1" data-bbox="689 842 1877 1098"> <tr> <td><b><u>Rear facing elevation to rear facing elevation containing windows serving habitable rooms</u></b></td> <td><b><u>21 metres</u></b></td> </tr> <tr> <td><b><u>Rear facing elevation to the side of another which does not contain a window serving a habitable room</u></b></td> <td><b><u>12 metres</u></b></td> </tr> <tr> <td><b><u>Rear facing elevation to rear garden boundary</u></b></td> <td><b><u>9 metres</u></b></td> </tr> </table> <p><b><u>Alternative distances of less than the recommended figures will only be considered where there is already an established pattern of development in an area that matches proposed developments, or alternative, non-traditional layouts achieve acceptable standards of privacy and amenity.</u></b></p> <p><b><u>Further guidance is provided in the Ipswich Space and Design Guidelines Supplementary Planning Document.</u></b></p>	<b><u>Rear facing elevation to rear facing elevation containing windows serving habitable rooms</u></b>	<b><u>21 metres</u></b>	<b><u>Rear facing elevation to the side of another which does not contain a window serving a habitable room</u></b>	<b><u>12 metres</u></b>	<b><u>Rear facing elevation to rear garden boundary</u></b>	<b><u>9 metres</u></b>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified.</p>
<b><u>Rear facing elevation to rear facing elevation containing windows serving habitable rooms</u></b>	<b><u>21 metres</u></b>									
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<b><u>Rear facing elevation to rear garden boundary</u></b>	<b><u>9 metres</u></b>									

			<b>New development that would adversely affect the continued operation of established uses will not be permitted.'</b>	
MM99	156	Policy DM21	<p>Amend Policy DM21: Transport and Access to New Developments, to read as follows:</p> <p><b>'POLICY DM21: Transport and Access to New Developments</b></p> <p><b>To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:</b></p> <ul style="list-style-type: none"> <li><b>a. not result in a severe impact on the highway network or unacceptable impacts on highway safety, either individually or cumulatively;</b></li> <li><b>b. not result in a significant detrimental impact on air quality <del>or an Air Quality Management Area</del> and <u>shall</u> address the appropriate mitigation measures as required <del>through in accordance with P</del> <u>policy DM3</u>;</b></li> <li><b>c. incorporate electric vehicle charging points, including rapid charging points in non-residential developments;</b></li> <li><b>d. provide a car club scheme or pool cars, where this would be consistent with the scale and location of the development;</b></li> <li><b>e. prioritise available options to enable and support travel on foot, by bicycle or public transport, consistent with local strategies for managing the impacts of growth on the transport network, and ensuring that any new routes are coherent and in accordance with the design principles of <del>P</del> <u>policy DM12</u> and local walking and cycling strategies and infrastructure plans;</b></li> <li><b>f. have safe and convenient access to public transport within 400m, and facilitate its use through the provision or contributions towards services or infrastructure;</b></li> <li><b>g. protect the public rights of way network and take appropriate opportunities to enhance facilities and routes;</b></li> </ul>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified, effective and consistent with national policy.</p>

			<p>h. ensure safe and suitable access for all users, including people with disabilities and reduced mobility;</p> <p>i. allow for the efficient delivery of goods and access by service, refuse collection and emergency vehicles and bus permeability; <del>and</del></p> <p>j. mitigate any significant impacts on the transport network; <u>and</u></p> <p>k. <u>contribute as required to other mitigation measures identified through Policy CS20 and the ISPA Transport Mitigation Strategy, where this meets the planning obligation tests in set out in national policy.</u></p> <p><b>Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated <u>and how the development would contribute to achieving the modal shift target for Ipswich by 2031.</u> The Council will expect major development proposals to provide <del>a</del> <u>an appropriate travel plan, having regard to the thresholds set out in the Suffolk County Council Suffolk Travel Plan Guidance</u>, to explain how sustainable patterns of travel to and from the site <u>and modal shift targets</u> will be achieved. Development proposals will be accompanied by a satisfactory Transport Statement or Transport Assessment, <u>having regard to the indicative thresholds below</u>, which demonstrates that the cumulative impacts of the development after mitigation are not severe. <u>A Transport Statement will generally be required for proposals for the development of:</u></b></p> <p>l. <u>30 to 49 dwellings</u></p> <p>m. <u>1,500 – 2,499 sq. m of Use Class E(g) floorspace;</u></p> <p>n. <u>2,500 – 3,999 sq. m of B2/B8 floorspace; and</u></p> <p>o. <u>800 – 1,499 sq. m of Use Class E(a) floorspace.</u></p> <p><b><u>A Transport Assessment will generally be required for proposals for the development of:</u></b></p> <p>p. <u>50 or more dwellings;</u></p> <p>q. <u>2,500 sq. m or more of Use Class E(g) floorspace;</u></p> <p>r. <u>4,000 sq. m or more of B2/B8 floorspace; and</u></p>	
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			<b>s. <u>1,500 sq. m or more of Use Class E(a) floorspace.</u></b>	
MM100	157 & 158	Paragraph 9.21.7	Amend paragraph 9.21.7 to read as follows:  'Additionally, new developments containing communal residential parking facilities, retail development and employment development should aim to deliver active charging capacity in accordance with the Suffolk Guidance for Parking. The proportion of rapid charging points will be specified through the Low Emissions Supplementary Planning Document, taking into account viability considerations. In terms of car club spaces, 100 per cent of such spaces should have the passive capacity for eventual EV charging. Further details of the Council's EV and car club approach are to be outlined in the emerging Low Emissions Strategy Supplementary Planning Document <u>which development must have regard to.</u> '	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM101	158	Paragraph 9.21.8	Amend paragraph 9.21.8 to read as follows:  'In proposals for the development of 30 to 49 dwellings, 1,500 – 2,499 sq. m <del>B1E(g)</del> , 2,500 – 3,999 sq. m B2/B8, or 800 – 1,499 sq. m retail <u>(E(a) floorspace</u> , a transport statement will generally be required with a planning application. For development of or exceeding 50 dwellings, 2,500 sq m <del>B1E(g)</del> , 4,000 sq m B2/B8, or 1,500 sq m retail <u>(E(a) floorspace</u> , a transport assessment will generally be required. Some smaller sites, in very sensitive locations, may require a transport assessment due to significant traffic impacts. Conversely, some larger sites may not give rise to significant impacts if they are in parts of the network that are not likely to be under pressure. A long term management strategy (Travel Plan) to increase sustainable patterns of travel to a site will also be secured in some instances, <u>having regard to the thresholds set out in the Suffolk County Council Suffolk Travel Plan Guidance</u> . The degree of negative impact of a development will be determined by the Council in conjunction with the Highways Authority on a case by case basis, as this will also depend on the spatial context of the individual planning application under consideration.'	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM102	159	Policy DM22	Amend Policy DM22: Car and Cycle Parking in New Development, to read as follows:  <b>'POLICY DM22: Car and Cycle Parking in New Development</b> <b>The Council will require all new development to have regard to adopted standards of car and cycle parking guidance to be complied with in all new development (except in the IP-One area), and will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities and create</b>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and

			<p>a safe and attractive environment. The Council will also require the provision of integral secure cycle parking in any new car parks in the town.</p> <p>Car parking must be designed so as not to dominate the development or street scene or to result in the inefficient use of land.</p> <p>There will be maximum standards of car parking provision with no minimum requirement for residential development within the IP-One Area, which has frequent and extensive public transport networks, and easy access to a wide range of employment, shopping, and other facilities.</p> <p>A central car parking core <del>will be</del> <u>is</u> defined in the town centre, through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. Within the central car parking core, only operational car parking will be permitted in connection with non-residential development, so that the stock of long-stay parking is not increased. <u>New, non-residential long-stay car parks, and on-street parking, will not be permitted within the central car parking core.</u></p> <p><u>Within the whole IP-One Area, proposals for additional long-stay car parking provision over and above that proposed through Policy SP17 will not be permitted, unless the proposal can demonstrate that it would not harm the effectiveness of modal shift measures outlined in the SCC Transport Mitigation Strategy for the Ipswich Strategic Planning Area, nor have a severe impact on the highway network, which cannot be adequately mitigated.</u></p> <p>New development will provide high quality, secure cycle storage, and within non-residential developments of more than 1,000 sq. m or where more than 50 people will be employed, high quality shower facilities and lockers. These facilities should also be provided in minor non-residential developments unless it can be demonstrated that it is not feasible or viable. Cycle parking across the Borough is required to be secure, sheltered, conveniently located, adequately lit, step-free and accessible.'</p>	unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with the cross-boundary strategic issue of traffic growth management.
MM103	160	Paragraph 9.22.8 & New Paragraph	<p>Amend paragraph 9.22.8 to read as follows:</p> <p>'In order to reduce congestion, manage air quality and encourage a modal shift away from the car, particularly amongst the commuting public, it is important to limit long-stay car parking within the central</p>	In accordance with the requirement in paragraph 16(d)

			<p>car parking core and control its provision across all of the IP-One area, and for organisations to encourage employees to travel to work by more sustainable means through travel planning. Therefore, only necessary operational parking will be allowed for new non-residential development within the central car parking core. This excludes staff parking but would include access which is considered essential, <u>for example: spaces for deliveries and visitors, spaces for staff who use private transport for visiting clients, spaces for school contract buses on education sites and spaces for setting down patients at health centres.</u>'</p> <p>Insert a new paragraph after paragraph 9.22.8 to read as follows:</p> <p><u>'Outside the Central Car Parking Core but within the rest of the IP-One area, proposals for additional long-stay and on-street car parking provision over and above that proposed through policy SP17 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document will not be permitted, unless the proposal can demonstrate that it would not harm the effectiveness of modal shift measures outlined in the SCC Transport Mitigation Strategy for the Ipswich Strategic Planning Area, nor have a severe impact on the highway network, which cannot be adequately mitigated. Evidence would be expected to include modelled data on vehicle movements as a result of the proposal, and evidence of measures taken to encourage sustainable travel such as smarter choice interventions and travel planning. Suffolk County Council Travel Plan Guidance<sup>1</sup> provides further information on how this may be achieved. '</u></p>	<p>of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with the cross-boundary strategic issue of traffic growth management.</p>
MM104	161	Policy DM23	<p>Amend Policy DM23: The Density of Residential Development, to read as follows:</p> <p><b>'Policy DM23: The Density of Residential Development</b></p> <p><b>The density of new housing development in Ipswich will be as follows:</b></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</p>

<sup>1</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/2019-02-01-FINAL-Suffolk-Travel-Plan-Guidance-Web-Version.pdf>



			<p>a. within the town centre, Portman Quarter (<del>formerly Ipswich Village</del>) and Waterfront, development will be expected to achieve a high density of at least 90 dwellings per hectare (dph);</p> <p>b. within the remainder of IP-One, District Centres and an 800m area around District Centres, development will be expected to achieve a medium density of at least 40 dph; <del>(the average will be taken as 45 dph);</del> and</p> <p>c. elsewhere in Ipswich, low-density development <u>of at least 35dph</u> will be required. <del>(the average will be taken as 35 dph).</del></p> <p>Exceptions to this approach will only be considered where:</p> <p>a. the site location, characteristics, constraints or sustainable design justify a different approach; or</p> <p>b. a different approach is demonstrated to better meet all housing needs in the area.</p> <p>To ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will require developers to meet the Nationally Described Space Standards set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015) unless it can be demonstrated that it would not be viable.’</p>	
MM105	162	Paragraph 9.23.4	<p>Amend Paragraph 9.23.4 to read as follows:</p> <p>‘Ipswich Borough Council has reviewed the densities outlined in the policy in relation to viability. However, <del>early the Whole Plan</del> <u>Viability testing Assessment</u> indicates that higher densities are unlikely to be viable due to a combination of rising build costs and relatively low sales values for flats, particularly larger two and three-bedroom flats. <del>The results of the Viability Assessment of the Local Plan Review will provide further information on this.</del> Notwithstanding this, the densities set out in the policy are minimum standards and this does not prevent developments being brought forward at higher <del>levels</del> <u>densities</u> where appropriate.’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM106	162	Paragraph 9.23.6	<p>Amend paragraph 9.23.6 to read as follows:</p>	In accordance with the

			<p>'It is important to strike an appropriate balance between providing freedom and flexibility for the housing market to operate and ensuring that land is used efficiently by achieving higher densities in the most sustainable locations. The exceptions in the above policy allow a degree of flexibility in controlled conditions, such as for example to protect heritage assets and landscape. Sites on the urban edge of Ipswich may require lower densities in certain circumstances where development needs to respond sensitively to the adjacent countryside and surrounding character. <del>The averages referred to will be used to calculate site capacities.'</del></p>	<p>requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.</p>
MM107	163 & 164	Policy DM24	<p>Amend Policy DM24: Protection and Provision of Community Facilities, to read as follows:</p> <p><b>'Policy DM24: Protection and Provision of Community Facilities</b></p> <p><b>The Council will:</b></p> <p><b>a. Ensure existing community facilities are retained unless one of the following tests is met:</b></p> <p><b>i. The applicant can <u>clearly</u> demonstrate <del>to the Council's satisfaction</del> that the facility is genuinely redundant, adequately marketed and surplus to current and future requirements; or</b></p> <p><b>ii. Alternative provision of an equivalent or better facility is proposed or available within a reasonable distance to serve its existing users;</b></p> <p><b>b. Take into account listing or nomination of 'Assets of Community Value' as a material planning consideration and encourage communities to nominate Assets of Community Value;</b></p> <p><b>c. Where possible and appropriate, facilitate shared community spaces for the delivery of community services;</b></p> <p><b>d. Direct new community facilities towards the <del>the</del> Borough's centres, or locations which are accessible to the facility's catchment, depending on the scale and nature of the proposal; and</b></p> <p><b>e. Expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements.</b></p> <p><b>Having regard to public houses, a marketing strategy for the public house must be agreed with the Local Planning Authority prior to applying for planning permission for change of use or redevelopment.</b></p>	<p>In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.</p>

			<p><b>The Council will seek to protect public houses, which are of community, heritage or townscape value.</b></p> <p><b>The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is <u>clearly demonstrated to the Council's satisfaction</u> that:</b></p> <p><b>a. the proposal would not result in the loss of pubs which are valued by the community (including protected groups) unless there are equivalent premises capable of meeting the community's needs; or</b></p> <p><b>b. there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term.</b></p> <p><b>Where a public house is converted to an alternative use, the Council will seek the retention of significant features of historic or character value.</b></p> <p><b>Applications involving the loss of pub floorspace, including facilities ancillary to the operation of the public house, will be resisted where this will adversely affect the operation of the public house.</b></p> <p><b>The Council will support the provision of new public houses in appropriate sites in growth areas, other highly accessible locations and town centres, subject to other policies in this Plan.'</b></p>	
MM108	168	Policy DM26	<p>Amend Policy DM26 to read as follows:</p> <p><b>'The Council will require advertisements to preserve or enhance the character of their setting and (where attached) to the host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.</b></p> <p><b><del>We</del> <u>The Local Planning Authority</u> will refuse advertisements that:</b></p> <p><b>a. contribute to an unsightly proliferation of signage in the area;</b></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.

			<p><b>b. result in excessive street clutter in the public realm;</b></p> <p><b>c. cause harmful light pollution to nearby residential properties or wildlife habitats; or</b></p> <p><b>d. impact upon public safety.'</b></p>	
MM109	170	Paragraph 9.27.1	<p>Amend Paragraph 9.27.1, to read as follows:</p> <p><u>'The Government recognises that the role of town centres is changing from its traditional retail high street approach. Town centres need to be dynamic and flexible in order to remain relevant and to be able to compete effectively with other retail sources such as on-line shopping as well as accommodating wider town centre uses. This is reflected in the Government NPPF and updated PPG 22 July 2019. The Government advises that Councils review the town centre and create character zones. <u>The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020</u> amended the Town and Country Planning (Use Classes) Order 1987 and introduced changes to the system of 'use classes'. The result of this was to replace former Classes A (Retail), B1 (Business), D1 (Non-Residential Institutions) and D2 (Assembly and Leisure) with new use classes. This included the creation of 'Class E' (commercial, business and service), combining formerly separate retail (A1), financial and professional services (A2), food and drink (A3), business (office, research and development and light industrial process) (B1), non-residential institutions (medical or health services, creches, day nurseries and centres), and, assembly and leisure (indoor sport, recreation or fitness and gyms) into one use class. In addition, public houses and drinking establishments (formerly A4) and hot-food takeaways (formerly A5) are now 'sui generis'. Cinema, concert hall, bingo hall, dance hall and live music venues (formerly D2) are also now 'sui generis'. The reasons for the changes to the Use Classes Order were to better reflect the diversity of uses found on high streets and in town centres and to provide the flexibility for businesses to adapt and diversify to meet changing demands.'</u></p>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM110	170-171	Policy DM27	<p>Amend Policy DM27: The Central Shopping Area, to read as follows:</p> <p><b>'POLICY DM27: The Central Shopping Area</b>  <b>The Council will support the town's vitality and viability by promoting and enhancing appropriate development in the Central Shopping Area, building in flexibility to meet the needs of retailers and leisure businesses appropriate to the Central Shopping Area.</b></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and

		<p>The Central Shopping Area comprises the Primary, Secondary and Specialist Shopping Zones, which are defined on the IP-One Area inset map. Sites identified as suitable for major retail investment <del>will be allocated</del> in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.</p> <p>Class E <del>A1</del> retail use (commercial, business and service) should remain the predominant use at all times in the Central Shopping Area, to ensure the strategic <del>retail</del> town centre function of Ipswich is maintained.</p> <p>a. Primary Shopping Zone – this is the principal retail centre for Ipswich. <del>Other complementary uses to the principal retail function will be permitted such as coffee shops, hairdressers and restaurants. However, 70% of All uses in the primary shopping zone are required to be primary retail commercial, business and service uses on the ground floor. An exception to this is the first floor of the Sailmakers Shopping Centre. Here A5 takeaway uses will not be permitted. Complementary uses such as hairdressers, coffee shops and restaurants will be supported.</del></p> <p>b. Secondary Shopping Zone – <del>A2-A5 uses, public houses, drinking establishments, takeaways, betting shops and payday loan shops and other main town centre uses (as defined by the NPPF (2019)) will be permitted where they will not exceed 35%15% of the units within the zone, provided the proposal does not create a concentration of more than three adjacent non-A1class E units, and the site is not adjacent to an existing non-A1class E use within the same Use Class as the proposal. No more than 10% of the total identified units within the Secondary Shopping Zone will be permitted for A4 or A5 public houses, drinking establishments or takeaway uses. The Council will support Local Development Orders which help to maintain an appropriate mix of uses and will support the use of pop-up shops and restaurants for up to 3 years in accordance with the General Development Order both to bring vacant units back into use and to allow entrepreneurs the opportunity to test their business models. This could also include limited use of training centres (F.1) and other such uses appropriate to the secondary shopping zone.</del></p> <p>c. Specialist Shopping Zone – This zone comprises <del>of</del> non-multiple retail uses, specialist shops such as music shops and services such as beauticians and hairdressers and jewellers or bespoke clothing and bags. Many of the units are listed buildings. It is in this zone and the secondary shopping zone where there are the majority of unlet units. Again, the Council supports the use of unlet units for pop-up shops and restaurants <del>as in the Secondary shopping zone above. Wider NPPF defined Main town centre uses, other than retail, as defined in the NPPF will be permitted where they will not exceed 40% of the units. No more than 35% of the total identified units within the identified sub-group of the Specialist Shopping Zone will be permitted for A2, A4 or A5 public houses, drinking establishments and takeaway uses.</del></p>	<p>unambiguous, for soundness in accordance with paragraph 35 of the NPPF, and, to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p>
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			<p>Proposals for non-<del>A1</del> class E uses that would exceed the maximum thresholds outlined for the zones above will only be permitted in circumstances where it can be robustly demonstrated that such a change would be beneficial to the vitality and viability of the shopping zone, such as uses that help to attract people to visit the centre during the evening, as well as flats above shops.</p> <p><del>A3, A4 and A5</del> Restaurants (where permission is required), public houses, drinking establishments and takeaway uses and other main town centre uses will only be permitted where they have no detrimental effect on the residential amenities of nearby residential accommodation in terms of noise, fumes, smell, litter and general activity generated from the use and retain an active frontage.</p> <p>Mixed use development, including <del>B1</del> offices, <del>A2</del> financial and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Central Shopping Area, provided there is a ground floor use in accordance with the zone guidance above.</p> <p>The Council will not grant planning permission for the <u>change of use of a ground floor unit to a use falling outside classes A1 to A5 Class E, public houses, drinking establishments and takeaway uses in Primary Shopping Zones; and falling outside A1 to A5 Class E, public houses, drinking establishments and takeaway uses</u> or a suitable town centre use as defined by the NPPF in the Secondary Shopping Zones.</p> <p>The Council will support opportunities to use vacant shop <u>units fronts</u> for uses such as pop-up shops and restaurants to promote the Town Centre in accordance with the General Development Order requirements and to help potential entrepreneurs test their business models for up to 3 years. It will also work closely with other organisations so that a shared <u>town centre</u> vision is created for the 21st century.</p> <p>The Council also supports the retention of the open market and will work to ensure it meets the needs of residents and visitors to the Borough.</p> <p>Developers need to also ensure that proposals contribute positively to the objectives of the “Ipswich Town Centre and Waterfront Public Realm Strategy” SPD and “Shopfront Design Guide” and other relevant SPD. The Council will expect <u>proposals to contribute to</u> the creation of a dementia-friendly town centre which is fit for all.’</p>	
MM111	171 & 172	Paragraph 9.27.3	<p>Amend paragraph 9.27.3 to read as follows:</p> <p>‘The purpose of the Central Shopping Area (CSA) is to focus <del>retail activity</del> <u>town centre uses</u> within a defined, concentrated area and enable visitors to easily combine other activities in the centre with their shopping trip,</p>	In accordance with the requirement in paragraph 16(d)

			such as meeting friends at a café, going to the bank or having a haircut. The concentration of activities benefits shoppers who wish to compare goods and prices in different shops before making their purchases or combine several activities in one trip, and retailers who want to see the maximum footfall possible outside their store. The policy approach of concentrating such activity within a defined area supports the vitality and viability of the centre.'	of the NPPF for policies to be clear and unambiguous.
MM112	172	Paragraph 9.27.5	Amend paragraph 9.27.5 to read as follows:  'Within the CSA, the predominant land use at ground floor level should be <u>commercial, business and service uses shops</u> (i.e. Use Class <del>A1-retailing E</del> ). However, there are other uses which complement <del>A1-shops-these uses</del> , which also have a role to play within the CSA, for example: <del>financial and professional services such as banks (class A2), cafes and restaurants (class A3),</del> drinking establishments, <del>(class A4)</del> hot food takeaways <del>(class A5)</del> and main town centre uses including leisure, entertainment, offices, arts, culture and tourism and residential uses.'	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM113	172	Paragraph 9.27.6	Amend paragraph 9.27.6 to read as follows:  'The CSA is therefore divided into three 'Shopping Zones'. The Primary Shopping Zone is the area where the greatest concentration of <del>A1-retail</del> <u>commercial, business and service uses</u> is expected. It is a relatively small area which largely coincides with the 'prime pitch' for retailers and it has the highest rents and footfall. The Secondary Shopping Zones are generally characterised by lower rents and footfall than the Primary Shopping Zone. In these areas, the focus remains on <del>A1-retailing</del> <u>commercial, business and service uses</u> , but a greater diversity of uses is permitted. The Specialist Shopping Zones contain the greatest diversity of uses. Shops tend to be in smaller units occupied by more specialist retailers. Some of the streets in this area consist of attractive historic buildings, which give them a special character, for example St Peters Street and Fore Street. For the purposes of the sequential approach to locating new retail development, only the Primary and Secondary Shopping Zones defined on the IP-One Area inset <del>pPolicies mMap</del> would be considered 'in town centre' sites defined through the NPPF as the primary shopping area. The shops or units within each of the	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

			three zones in the CSA are broken down into groups. The groups usually consist of a collection of buildings located in close proximity fronting the street or pavement, segregated by intersecting streets.’	
MM114	172	Paragraph 9.27.7	<p>Amend paragraph 9.27.7 to read as follows:</p> <p>‘The previous Local Plan assessed individual frontages within each zone, which were monitored and updated annually. In practice, however, <del>the application of</del> applying the thresholds of each zone to individual frontages resulted in a policy that was unable to respond to the changing make-up and retail experience of these zones. There were instances where the policy restricted empty retail (<u>formerly A1</u>) units from being brought back into alternative uses due to concentrations of non-<del>A1</del><u>retail</u> uses on a particular street frontage being too high. In addition, the frontage measurement approach often made it difficult to apply flexibility to given frontages, as some uses had frontage lengths that were disproportionate to the length of the street.’</p>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM115	173	Paragraph 9.27.10	<p>Amend paragraph 9.27.10 to read as follows:</p> <p>‘In cases where applicants are proposing a change of use from <del>an A1</del> <u>Class E use</u> to a non-<del>A1</del><u>Class E</u> use that would fall above the defined thresholds, it is advised that they enter into pre-application discussions with the Council to determine the type of information that would be required to robustly demonstrate that it would add to the vitality and viability of the zone. In order to demonstrate that exceptional circumstances warrant the proposed non-<del>A1</del><u>Class E</u> use, the following factors will be considered:</p> <ul style="list-style-type: none"> <li>• The amount of time that the existing use has been vacant, including any information regarding the marketing of the unit;</li> <li>• The presence of other vacant <del>A1</del> <u>Class E</u> units in the Shopping Zone, including any information regarding the marketing of these units;</li> <li>• The contribution that the proposed non-<del>A1</del><u>Class E</u> use would make to the vitality and viability of the Shopping Zone and wider Central Shopping Area;</li> <li>• The active frontage of the proposed non-<del>A1</del><u>Class E</u> use, taking into consideration the physical frontage, hours of use and type of use; and</li> </ul>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.



			<ul style="list-style-type: none"> <li>• The size of the unit.'</li> </ul>	
MM116	173	Paragraph 9.27.11	<p>Amend paragraph 9.27.11 to read as follows:</p> <p>'The approach to land use within the CSA is to maintain a balance between <del>A1 retail commercial, business and service uses</del> and other appropriate uses, through the control of units within the zones. <del>The Town and Country Planning General Permitted Development Order 2015 introduced new permitted development rights for existing A1 units however the policy remains relevant due to size limitations contained within the new Order.</del> Uses in the CSA are monitored and updated annually.'</p>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM117	173	Paragraph 9.27.12	<p>Amend paragraph 9.27.12 to read as follows:</p> <p>'In the Secondary and Specialist Shopping Zones, the previous percentages have been <del>retained</del> <u>reduced</u> in this plan <u>to reflect the amendments to the use classes order introduced.</u> <del>but</del> The policy now also refers to other main town centre uses being supported, in recognition of the need for centres to offer a range of attractions in order to maintain vitality and viability.'</p>	For soundness in accordance with paragraph 35 of the NPPF and to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM118	173	Paragraph 9.27.15	<p>Delete paragraph 9.27.15 in its entirety as follows:</p> <p><del>9.27.15 — 'Under a change to the Permitted Development Order that came into force on 30th May 2013, changes from a use falling within Classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments), Class A5 (hot food takeaways), B1 business), D1 (non-residential institutions) and D2 (assembly and leisure) to another use within that same group of uses became, for a temporary period of up to two years, Permitted Development. Such changes are subject to Prior Notification of the local planning authority and exclude changes to</del></p>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

			floor areas in excess of 150 square metres and listed buildings. Monitoring indicates that there have been few such changes of use to date within the CSA.'	
MM119	174	Paragraph 9.27.16	Amend paragraph 9.27.16 as follows:  9.27.16 'The Council will seek funding opportunities to make environmental enhancements to the public realm of the centre and help it to remain competitive and attractive to users. The priority for improvements during the plan period will be the Cornhill, Tavern Street and Westgate Street. These enhancements should follow the key design principles set out in the Council's SPD "Ipswich Town Centre and Waterfront Public Realm Strategy" with a view to creating a dementia-friendly environment and a public realm fit for all. Where shopfronts are vacant and no longer providing an active frontage on the street, the Council will support opportunities to successfully use these frontages where they help to promote the vitality of the Town Centre. This could be through visual enhancements. Works to the shopfront which require advertisement consent and/or planning permission will need to also adhere to the principles of policies DM25 (shopfront) and DM26 (advertisements), as well as the Shopfront Design Guide SPD.'	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM120	175	Policy DM28	Amend the heading of Policy DM28: Arts, Culture and Tourism (formerly policy SP14), to read as follows:  <b>'POLICY DM28: Arts, Culture and Tourism (formerly policy SP14)'</b>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM121	178-179	Policy DM30	Amend Policy DM30: District and Local Centres, to read as follows:  <b>'POLICY DM30: District and Local Centres</b>  <b>The Council will support the retention and provision of local shops and community facilities within defined District and Local Centres. The Centres are defined on the pPolicies mMap and IP-One Area inset pPolicies mMap.</b>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, for

		<p><b>Within the defined District and Local Centres:</b></p> <p>a. proposals for the provision of additional shops or extensions to existing shops will be permitted provided they are of a scale appropriate to the centre. The requirements of the National Planning Policy Framework (NPPF) should be satisfied;</p> <p>b. proposals for change of use from <del>A1 to A2</del> <u>A5 Class E (commercial, business and services)</u> to public houses, drinking establishments, takeaways, betting shops and payday loan shops and <del>D1 F1</del> <u>uses and other sui generis uses appropriate to a centre, including launderettes, will be permitted where they will not exceed 40% 35% of the total identified ground floor frontage, provided the identified shopping frontage or the shopping character and range of shops is not unacceptably diminished. No more than 20% of the total identified ground floor frontage will be permitted for A4 or A5 uses;</u></p> <p>c. proposals for the change of use of ground floor units to <u>F1, F2 and other suitable Sui Generis uses which meet the needs of the local community</u> <del>community facilities</del> will be permitted provided that:</p> <p>i. satisfactory vehicular access and car parking can be provided;</p> <p>ii. in the case of a vacant unit, the unit has suffered from a clearly demonstrated long-term vacancy for a period of at least 12 months. A marketing strategy for the unit must be agreed with the Local Planning Authority prior to its implementation and the agreed strategy implemented for a minimum period of 12 months prior to applying for planning permission for change of use or redevelopment. Any such application must be accompanied by an independent appraisal of the economic viability of the facility in its current use; and</p> <p>iii. the physical treatment of the unit minimises the problem of dead frontages or is appropriate to the proposed use.</p> <p>d. Residential uses will not be permitted on <u>the</u> ground floor unless it has been clearly demonstrated the unit has suffered from long term vacancy for at least 12 months and none of the uses stated in paragraphs a, b, and c, are suitable, viable or deliverable.</p> <p>Outside District Centres but within a 400m straight line distance of the centre the provision of community facilities will be permitted provided the facility:</p> <p>e. is appropriate in scale and supports the needs of the adjacent residential area;</p>	<p>soundness in accordance with paragraph 35 of the NPPF, and, to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p>
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			<p>f. is accessible to all sectors of the community; and</p> <p>g. offers satisfactory vehicular access and car parking space in accordance with the Council's standards.</p> <p><b>One new District Centre is proposed within the plan period at Sproughton Road. This centre will provide retail units and community facilities of a scale appropriate to serve its catchment area. Development of the Ipswich Garden Suburb in accordance with policy CS10 will require the provision of a new District Centre and two new local centres.'</b></p>	
MM122	179	Paragraph 9.30.4	<p>Amend paragraph 9.30.4 to read as follows:</p> <p>'The approach to District and Local Centres is to strengthen their role and function and seek to retain shops and community facilities. Within the District and Local Centres, a balance between <del>A1 retail (shops)</del> <u>Class E (commercial, business and services)</u> and non-<del>A1</del><u>Class E</u> uses (such as <del>food and drinking</del> establishments) will be maintained. <del>A2 to A5 uses</del> <u>Public houses, drinking establishments, takeaways and other</u> and sui generis uses appropriate to a centre will also be supported, provided the overall percentage of the frontage does not exceed the levels specified in the policy. District centres are listed under policy CS2. The local centres are listed below (with reference numbers for cross reference to the policies map).</p> <ul style="list-style-type: none"> <li>• Fircroft Road (1)</li> <li>• Garrick Way (2)</li> <li>• Dale Hall Lane/Dales Road (4)</li> <li>• Ulster Avenue (5)</li> <li>• Norwich Road (197-307a) (6)</li> <li>• Dickens Road (8)</li> <li>• Cambridge Drive (10)</li> <li>• Maidenhall Green (12)</li> <li>• Ellenbrook Green (14)</li> <li>• Colchester Road (61-65) (15)</li> <li>• Brunswick Road (16)</li> <li>• Cauldwell Hall Road/Spring Road (19)</li> </ul>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

			<ul style="list-style-type: none"> <li>• Cauldwell Hall Road/St John's Road (20)</li> <li>• Foxhall Road (25-97, 34-124) (21)</li> <li>• Bixley Road/Foxhall Road (22)</li> <li>• Selkirk Road (24)</li> <li>• Clapgate Lane (207-221)/Landseer Road (325-327a) (25)</li> <li>• Reynolds Road (26)</li> <li>• Queen's Way (29)</li> <li>• Felixstowe Road (474-486) (30)</li> <li>• Penshurst Road (31)</li> <li>• Cliff Lane (32)</li> <li>• St Helen's Street (33)</li> <li>• Bramford Lane (34)</li> <li>• Bramford Road (35)</li> <li>• Spring Road (36)</li> <li>• Albion Hill, Woodbridge Road (291-386) (37)</li> <li>• Lavender Hill (38)</li> <li>• Bramford Road (560 and 651-677) (40)</li> <li>• Bramford Lane (483-487) (42)</li> <li>• St Matthew's Street (44)</li> <li>• Woodbridge Road (28-110) (46)</li> </ul>	
MM123	180	Paragraph 9.30.8	<p>Amend paragraph 9.30.8 to read as follows:</p> <p>'The approach is to maintain a balance between <del>retail-Class E</del> uses and non-<del>retail-Class E</del> uses, through the control of frontages. An analysis of the existing frontages in a sample of the District and Local Centres supports the <del>increase in the thresholds of 35% of non-Class E A2 to A5 uses, to 40%.</del>'</p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy in the Town and Country Planning (Use Classes) (Amendment)

				(England) Regulations 2020.
MM124	180	Paragraph 9.30.9	<p>Delete paragraph 9.30.9 in its entirety as follows:</p> <p><del>‘The introduction of use class categories A4 and A5 (drinking establishments and hot food takeaways previously use class A3) has been reflected in the policy. This will <u>to assist in controlling the night-time economy.</u> A proportion of 20% has been set, which is higher than the threshold set for the Central Shopping Area, but appropriate, as the District and Local Centres serve residential communities.’</del></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM125	180	Paragraph 9.30.10	<p>Amend paragraph 9.30.10 to read as follows:</p> <p><del>‘The policy allows change of use to take place from <u>retail commercial, business and service uses</u> to proposals for community uses where certain criteria apply. Residential uses will be encouraged on upper floors in the centres and in the vicinity of the centres to maximise access to shops and facilities. Accessible under clause f of policy DM30 relates to community facilities being accessible by a range of transport modes including for those without a car.’</del></p>	To ensure the Plan is consistent with national policy in terms of reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM126	181	Policy DM31	<p>Amend Policy DM31: Town Centre Uses Outside the Central Shopping Area, to read as follows:</p> <p><b>‘POLICY DM31: Town Centre Uses Outside the Central Shopping Area</b></p> <p><b>Within the Town Centre, which is defined on the IP-One Area inset pPolicies nMap, but outside the Central Shopping Area, the development of non-retail town centre uses, including leisure, recreation, culture and tourism uses, will be permitted. This area must be considered before edge or out of centre</b></p>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes)

			locations for these town centre uses. <del>B1</del> Office uses and mixed use schemes including housing will also be encouraged in the town centre, however industrial uses (Use Class E (g), excluding offices, B2 or B8 B-Class uses excluding offices) will not be permitted.'	(Amendment) (England) Regulations 2020.
MM127	181	Paragraph 9.31.3	Amend paragraph 9.31.3 to read as follows:  'The non-retail main town centre uses which are managed through this policy are predominantly focused away from the Central Shopping Area, with the exception of a small element permitted in the Secondary and Specialist Shopping Areas or as part of certain mixed use developments as described in policy DM27, in order to maintain <u>Class E (commercial, business and service) A1-retail uses</u> as the predominant use in the Central Shopping Area. For the development of non-retail town centre uses outside the Town Centre, the NPPF shall apply.'	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM128	182	Policy DM32	Amend Policy DM32: Retail Proposals Outside Defined Centres, to read as follows:  <b>'POLICY DM32: Retail Proposals Outside defined Centres</b> <b>Retail proposals for more than 200 sq. m net floorspace in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable under the terms of the National Planning Policy Framework (NPPF), particularly in terms of:</b>  <ul style="list-style-type: none"> <li>a. the appropriate scale of development;</li> <li>b. the sequential approach;</li> <li>c. avoiding significant adverse impact on existing Defined Centres, including any cumulative impact; and</li> <li>d. accessibility by a choice of means of transport.</li> </ul> <p><u>Retail developments of more than 200sqm net outside defined centres will be required to undertake a retail impact assessment. Assessment of the retail impact of proposed development on the Central Shopping Area will only be required where the retail floorspace proposed exceeds 525 sq. m net.</u></p> <p><u>The requirement for a sequential test does not apply to applications for small scale rural offices or other small scale rural development.'</u></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.

MM129	183	Paragraph 9.32.5	<p>Amend paragraph 9.32.5 to read as follows:</p> <p>'This policy applies to retail proposals which are defined as those uses falling within <del>Use Classes A1 (Shops), A2 (Financial and Professional Services) and A5 (Hot Food Takeaways)</del> only. <del>Use Classes A3 (Restaurants and Cafes) and A4 (Drinking Establishments)</del> are classified as leisure within the NPPF definition of main town centre uses and therefore this policy does not apply to these uses. It is important to distinguish between these <u>uses</u> <del>classes</del> as it affects the application of the sequential test, as set out in the NPPF.'</p>	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM130	183	Paragraph 9.32.6	<p>Amend paragraph 9.32.6 to read as follows:</p> <p><u>'The requirement to undertake a sequential test, in Policy DM32, applies to all retail proposals, except small scale rural offices or other small scale rural development, as per Paragraph 88 of the NPPF (2019). The requirement for a Retail Impact Assessment will apply to all proposals outside of defined centres which give rise to more than 200 sq.m net floorspace, either from a single unit or the aggregation of units within the proposed development. Retail proposals that are over 525 sq. m net will be required to undertake an impact assessment on all Defined Centres (including the Central Shopping Area) in the catchment area. Retail proposals that are between 200 and 525 sq. m net will be required to undertake an impact assessment on District and Local Centres in the catchment area. All impact assessments will need to consider the impact of the proposal on existing, committed and planned public and private investment in Defined Centres in the catchment area of the proposal, taking account of cumulative impact. The impact assessment should consider the impact of the proposal on the vitality and viability of Defined Centres.'</u></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.
MM131	184	Policy DM33	<p>Amend Policy DM33: Protection of Employment Land, to read as follows:</p> <p><b>'POLICY DM33: Protection of Employment Land</b>  <b>The Employment Areas are defined on the pPolicies mMap and the IP-One Area inset pPolicies mMap and listed below:</b></p> <p><b>1. Ipswich Business Park, north of Whitton Lane;</b></p>	For soundness in accordance with paragraph 35 of the NPPF and to reflect the Town and Country Planning (Use



		<ol style="list-style-type: none"> <li>2. White House Industrial Estate, White House Road;</li> <li>3. Knightsdale Road / Wharfedale Road;</li> <li>4. Boss Hall Industrial Estate;</li> <li>5. Hadleigh Road Industrial Estate, including Elton Park;</li> <li>6. Land south of London Road / east of Scrivener Drive;</li> <li>7. Civic Drive / Princes Street / Russell Road / Portman Road;</li> <li>8. Felaw maltings / IP-City Centre;</li> <li>9. Riverside Industrial Park and the West Bank area;</li> <li>10. Cavendish Street;</li> <li>11. Holywells Close and Holywells Road;</li> <li>12. Cliff Quay/Sandy Hill Lane / Greenwich Business Park / Landseer Road area;</li> <li>13. Wright Road / Cobham Road;</li> <li>14. The Drift / Leslie Road / Nacton Road;</li> <li>15. Ransomes Europark;</li> <li>16. Airport Farm Kennels, south of Ravenswood; and</li> <li>17. Futura Park, Nacton Road.</li> </ol> <p>The defined Employment Areas will be safeguarded for employment and ancillary uses. <u>The Council may seek to safeguard employment uses and development falling within Use Class E(g) by way of planning conditions to remove permitted development rights for changes of use to other uses within Class E, where this would be necessary and reasonable to ensure compliance with the strategy of the plan and national policy.</u></p> <p>Employment uses are defined as:</p> <ol style="list-style-type: none"> <li>i. <del>B1 Business</del> Use Class E(g), B2 General Industry or B8 Storage and Distribution, as defined by the Use Classes Order 1987 (as amended), with a town centre first approach to the location of offices; and</li> <li>ii. appropriate employment-generating sui generis uses.</li> </ol> <p>Small scale services specifically provided for the benefit of businesses based, or workers employed, within the Employment Area will also be permitted where:</p> <ol style="list-style-type: none"> <li>a. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; and</li> </ol>	<p>Classes) (Amendment) (England) Regulations 2020.</p>
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			<p><b>b the proposed use is compatible with the surrounding uses.</b></p> <p><b>Outside the defined Employment Areas, the conversion, change of use or redevelopment of sites and premises in employment use to non-employment uses will only be permitted where:</b></p> <p><b>c. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; or</b></p> <p><b>d. the proposed use is residential and it can be acceptably accommodated, would make more effective use of the site and would not harm the economic development strategy of the plan; and</b></p> <p><b>e. in relation to c. and d., the proposed use is compatible with the surrounding uses and is an appropriate use for the site.'</b></p>	
MM132	184-185	Paragraph 9.33.1	<p>Amend paragraph 9.33.1 to read as follows:</p> <p>'The established Employment Areas across the Borough represent very significant clusters of employers providing jobs and therefore need to be safeguarded. The jobs growth target set out in policy CS13 means that protecting against the loss of employment areas is important. <u>Conditions may be applied to permissions to prevent employment uses in Use Class E(g) in protected employment areas from changing to alternative uses within Class E under permitted development rights, where this would undermine the strategy of the Plan or be contrary to national policy. For example where change of use to retail in an out-of-centre location could take place that could harm the vitality and viability of existing centres. Each application will be judged on its own merits as to whether conditions are reasonable and necessary in each instance.</u> Protecting employment areas for employment use also retains choice of locations across the Borough for businesses to locate in. As consolidated employment areas, operational requirements such as 24 hour working or heavy goods access are also more likely to be capable of being met without adversely affecting the amenity of residential areas. Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.'</p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy and to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

MM133	185	Paragraph 9.33.3	<p>Amend paragraph 9.33.3 to read as follows:</p> <p>'Retail uses will not be permitted other than as small scale retailing ancillary to the main <del>B class</del> <u>employment</u> use. Ancillary uses are defined in terms of size of floorspace and there being a functional relationship with the main B class use. Ancillary retailing should be less than 10% of the floorspace or 200 sq. m net, whichever is the smaller.'</p>	To reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM134	185	Paragraph 9.33.4	<p>Amend paragraph 9.33.4 to read as follows:</p> <p>'To demonstrate no reasonable prospect of re-use for employment purposes over the plan period in accordance with the policy, applicants will be required to produce evidence that the site has been marketed actively for a continuous period of at least twelve months from the date of the first advertisement for employment uses as appropriate to the site. Further information on the marketing requirement are set out in <del>a</del>Appendix 6. <u>In addition, in determining whether there is no reasonable prospect, the Council will take into account factors such as: the length of time since the site was allocated in the development plan; the planning history of the site, including any planning application or pre-application enquiries; and whether there have been any changes of circumstance that mean that take-up of the site for its intended use is now unlikely.'</u></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and consistent with national policy.
MM135	185	Paragraph 9.33.7	<p>Amend paragraph 9.33.7 to read as follows:</p> <p>'References to employment uses in this policy and reasoned justification exclude retail uses. Appropriate employment-generating sui generis uses referred to in the policy include uses such as car showrooms with accompanying workshops and waste facilities and excludes any sui generis use which includes retail or leisure as anything other than an ancillary use. Small scale services could include small gyms or cafes (use classes <del>D2 or A3</del> <u>E</u>) providing facilities targeted at people working in the area. All uses, whether temporary or permanent, will be expected to provide appropriate facilities on the site for employees.'</p>	To reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and ensure

				consistency with national policy.
MM136	188	Paragraph 10.8	<p>Amend paragraph 10.8 to read as follows:</p> <p>‘Table 8A identifies the major pieces of infrastructure required to support growth. In addition, support is indicated elsewhere in the plan for other pieces of infrastructure, such as a Wet Dock Crossing. However these are not prerequisites for development to take place. As indicated in policy CS17, new development will need to meet its on- and off-site infrastructure needs through direct provision and/or section 106 contributions. <u>Section 106 agreement contributions required are set out on a per dwelling basis in the Infrastructure Delivery Plan.</u> The Recreational <del>€</del>Disturbance Avoidance and Mitigation Strategy (RAMS) referred to in <del>€</del>Policy CS17 is essential to support planned growth in the Borough, but is not included in <del>€</del>Table 8A as the measures proposed are not classed as infrastructure. For example, measures include site wardening<del>ings</del>. The RAMS Supplementary Planning Document sets out the charge levied to all new dwellings and the programme of measures.’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.
MM137	190 – 201	Table 8A	Amend Table 8A Major Infrastructure Proposals as set out in Appendix 6 of the Schedule.	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared and justified.
MM138	207 – 211	Chapter 11	<p>Amend the title of Chapter 11 to read as follows:</p> <p><u>CHAPTER 11: Key Targets associated with Part B Strategic Local Plan Objectives, Indicators and Targets</u></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and

				for soundness in accordance with paragraph 35 of the NPPF.
MM139	207	Paragraph 11.3	Amend paragraph 11.3 to read as follows:  'It is <del>suggested</del> <u>considered</u> that indicators should focus on measuring performance against the objectives set out in Chapter 6. The indicators set out below relate to the objectives in this document.'	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.
MM140	207	Objective 1	Amend Objective 1: Strategic Working, to read as follows:  <b>'OBJECTIVE 1: STRATEGIC WORKING</b>  <b>To work with other local authorities in the Ipswich Strategic Planning Area and with community partners to ensure a coordinated approach to planning and development.</b>  INDICATOR(S)  Joint working taking place through the ISPA Board (or other equivalent forum).  <u>Provision of essential major transport infrastructure.</u>  <u>Provision of education infrastructure.</u>  TARGETS  <del>To achieve effective cross boundary working on strategic matters.</del>  <u>Completion of joint master planning of land north of Humber Doucy Lane (Policy ISPA 4 and ISPA4.1) by 2026/27 in conjunction with East Suffolk Council.</u>  <u>Delivery of the essential major transport infrastructure proposals identified in Table 8A by 2036, working with Suffolk County Council as highway authority.</u>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.

			<u>Delivery of the essential early years, primary, secondary and post-16 educational infrastructure proposals identified in Table 8A by 2036, working with Suffolk County Council as local education authority.</u>	
MM141	207	Objective 2	<p>Amend Objective 2: Growth, to read as follows:</p> <p><b>‘OBJECTIVE 2: GROWTH</b></p> <p><b>At least (a) <del>8,010</del> 8,280 new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2018 and 2036 in a manner that addresses identified local housing needs and provides a decent home for everyone, with 31% at the Ipswich Garden Suburb, 30% at the northern end of Humber Doucy Lane and 15% in the remainder of the Borough being affordable homes; and (b) approximately 9,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Strategic Planning Area between 2018 and 2036.</b></p> <p>INDICATOR(S)</p> <p>Net additional homes provided in the monitoring year.</p> <p>Number of affordable homes provided in the monitoring year.</p> <p>Net annual housing and employment land completions.</p> <p>Employment rates.</p> <p>TARGETS</p> <p>To deliver at least (a) <del>8,280</del><del>8,010</del> homes by 2036 and approximately (b) 9,500 jobs by 2036.</p> <p><u>80% of major new developments of 15 dwellings or more (or on sites of 0.5ha or more) to provide for at least 15% on-site affordable housing by number of dwellings (where affordable housing is required in accordance with policy CS12).</u></p> <p><u>31% of housing delivered at Ipswich Garden Suburb and the northern end of Humber Doucy Lane by 2036 to be affordable housing as defined in the glossary.’</u></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.

MM142	208	Objective 4	<p>Amend Objective 4: Sustainable Development, to read as follows:</p> <p><b>‘OBJECTIVE 4: SUSTAINABLE DEVELOPMENT</b></p> <p><b>Development must be sustainable, environmentally friendly and resilient to the effects of climate change.</b></p> <p>INDICATOR(S)</p> <p><u>Proportion of dwellings granted planning permission that achieve Building for Life 12 provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources.</u></p> <p><del>Development brought forward on previously developed land.</del></p> <p>Number of schemes incorporating attenuation and infiltration SUDs.</p> <p><del>Flood and coastal erosion risk management.</del> <u>Measuring major application compliance with the Development and Flood Risk SPD.</u></p> <p><del>Environment Agency consultation responses.</del></p> <p>TARGETS</p> <p><del>Securing schemes of high quality design which enhance the environment and minimise flooding.</del></p> <p><u>All new build development of 10 or more dwellings or in excess of 1,000 sq. m of residential or non-residential floorspace providing at least 15% of their energy requirements from decentralised and renewable or low-carbon sources.</u></p> <p><u>100% of new residential development to include SUDS (where the development site and soil structure allows).</u></p> <p><u>100% of major applications complying with the requirements of the Development and Flood Risk SPD.</u></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.
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			<u>Zero permissions granted contrary to Environment Agency advice (where EA consulted).</u>	
MM143	208	Objective 5	<p>Amend Objective 5: Air Quality, to read as follows:</p> <p><b><u>'OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE</u></b></p> <p><b>Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.</b></p> <p>INDICATOR(S)</p> <p><del>Per Capita CO2 emissions in the local authority area.</del></p> <p>Local authority CO2 emissions.</p> <p>Local authority air pollution data.</p> <p>Number <u>and extent</u> of designated AQMAs.</p> <p><u>NOx concentrations measured through AQMA data and DEFRA returns.</u></p> <p>TARGETS</p> <p><del>To reduce the level of identified air pollutants in the National Air Quality Strategy.</del></p> <p><u>To reduce the extent of AQMAs by 2036 in accordance with the corporate Air Quality Action Plan Review (Council Target).</u></p> <p><u>To reduce Ipswich's Borough Council's estimated carbon footprint to achieve carbon neutrality by 2030 from the 2019 base level. (Council Target).</u> <del>from the 2004 base level (CRed)'</del></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.
MM144	209	Objective 6	<p>Amend Objective 6: Transport and Connectivity, to read as follows:</p> <p><b><u>'OBJECTIVE 6: TRANSPORT AND CONNECTIVITY</u></b></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is



		<p><b>To improve accessibility to and the convenience of all forms of transport and achieve significant modal shift from the car to more sustainable modes through local initiatives. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative ‘green’ non-vehicular access around the town and urban greening of existing routes. Specifically:</b></p> <ul style="list-style-type: none"> <li>• <b>Significant improvements should take place to the accessibility to and between the three key nodes of: the railway station (including the wider <del>Ipswich Village</del> <u>Portman Quarter</u> environment), the Waterfront (and particularly the Education Quarter) and the Central Shopping Area;</b></li> <li>• <b>Additional east-west highway capacity could be provided within the plan period in the Ipswich area to meet the needs of the wider population and to provide the potential to reallocate some central road space;</b></li> <li>• <b>Comprehensive, integrated cycle routes should be provided; and</b></li> <li>• <b>Ipswich Borough Council aspires to an enhanced public transport system.</b></li> </ul> <p>INDICATOR(S)</p> <p>Number of travel plans agreed for new developments.</p> <p><u>Financial and other contributions by major new residential planning approvals towards transport mitigation measures.</u></p> <p><del>Travel to work distances and travel to work modes.</del></p> <p>TARGETS</p> <p><del>Increase the proportion of journeys undertaken by sustainable modes.</del></p> <p><u>100% of eligible development proposals to provide a travel plan to assist sustainable patterns of travel to be achieved by 2036.</u></p> <p><u>15% modal shift for journeys of Ipswich residents by 2031.’</u></p>	justified and effective.
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MM145	209	Objective 7	<p>Amend Objective 7: Retail and Cultural Offer, to read as follows:</p> <p><b>‘OBJECTIVE 7: RETAIL AND CULTURAL OFFER</b></p> <p><b>To enhance the vitality and viability of the town centre and district centres in response to changing consumer habits.</b></p> <p>INDICATOR(S)</p> <p><u>Occupancy rates in the Central Shopping Area and District Centres.</u></p> <p>Net additional retail floor space in the Central Shopping Area and outside.</p> <p><u>Harper Denis Hobbs Vitality Index.</u></p> <p><u>Footfall in the town centre.</u></p> <p>Number of tourism events in the town centre.</p> <p>Visitors to the Regent Theatre and Corn Exchange.</p> <p>Public realm improvements.</p> <p>TARGETS</p> <p><del>To improve the town’s cultural offer and to support the sustainable growth of the town’s evening and night time economy.</del></p> <p>To improve the retail rank of Ipswich <u>from 485 on the 2017 Harper Dennis Hobbs Vitality Index to 250 by 2036.</u></p> <p><u>To deliver 10,000 sq.m net of new comparison retail floorspace by 2031.</u></p> <p><u>To achieve 90% occupancy rates in the Central Shopping Area by 2036.</u></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.
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			<p><u>To achieve 95% occupancy rates in District and Local Centres by 2036.</u></p> <p><u>To achieve a 20% increase in footfall in the town centre by 2036.</u></p> <p><u>To deliver a 10% increase in attendance at tourism and cultural events by 2036 from a base of 216,100 visitors in 2018/19.</u></p> <p><u>To deliver a 10% increase in attendance at the Regent Theatre and the Corn Exchange by 2036 from a base of 172,360 visitors in 2018/19.</u></p> <p><u>To deliver the Public Realm elements of the £25 million Towns Fund Scheme by 2036.</u></p> <p><u>To improve the prosperity of Ipswich's Local and District Centres.'</u></p>	
MM146	210	Objective 8	<p>Amend Objective 8: Design and heritage, to read as follows:</p> <p><b>'OBJECTIVE 8: DESIGN AND HERITAGE</b></p> <p><b>A high standard of design will be required in all developments. Development should conserve and enhance the historic environment of Ipswich, including historic buildings, archaeology and townscape.</b></p> <p>INDICATOR(S)</p> <p>Number of buildings on the Suffolk <u>Register of Buildings at Risk register.</u></p> <p>Number of buildings and conservation areas on the Historic England Heritage at Risk register.</p> <p><u>Number of residential developments built to Building Regulations standard M4(2).</u></p> <p>TARGETS</p> <p><del>To secure a high standard of design and reduce the number of Ipswich buildings at risk on the Suffolk Risk Register and Historic England Risk Register.</del></p>	<p>For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.</p>

			<p><u>To reduce the 5 listed buildings on the Suffolk Register of Buildings at Risk to 3 by 2036 and remove the 1 listed building on the Historic England Heritage at Risk Register by 2036.</u></p> <p><u>Ensure that by 2036, in all residential developments of 10 or more homes, 25% of new dwellings to be built to Building Regulations standard M4(2).'</u></p>	
MM147	210	Objective 9	<p>Amend Objective 9: Natural Environment, to read as follows:</p> <p><b>‘OBJECTIVE 9: NATURAL ENVIRONMENT</b></p> <p><b>To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use.</b></p> <p>INDICATOR(S)</p> <p>Net change in extent of protected habitat associated with development.</p> <p><del>Recorded condition of designated ecological sites.</del></p> <p><del>Habitat mitigation secured.</del></p> <p>Number of schemes complying with the biodiversity Defra metric.</p> <p><u>Tree canopy cover.</u></p> <p><u>Recording implementation of RAMS mitigation measures</u></p> <p>TARGETS</p> <p><u>No net loss of designated habitat to development.</u></p> <p><u>To seek improvement in the quality of the SSSI’s, as recorded by Natural England every five years by 15% by 2036.</u></p> <p><u>100% of new development to secure measurable net gains for biodiversity on an annual basis. Net gain of natural capital by 2036.</u></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.

			<p><u>To achieve a target of 22% canopy cover or better by 2050 (Council Target).</u></p> <p><u>Ensuring mitigation measures to reduce recreational impact on to the Special Protection Areas are delivered in accordance with the RAMS project.</u></p> <p><del>Habitat mitigation secured.</del></p>	
MM148	210	Objective 10	<p>Amend Objective 10: Community Facilities and Infrastructure, to read as follows:</p> <p><b>‘OBJECTIVE 10: COMMUNITY FACILITIES AND INFRASTRUCTURE</b></p> <p><b>To retain, improve and provide high quality and sustainable education facilities, health facilities, and sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the local demand.</b></p> <p>INDICATOR(S)</p> <p><del>Ratio of Full Time Equivalent (FTE) Pupils to Full Time Qualified Teachers.</del></p> <p><del>Educational attainment including GCSE and equivalent results for young people.</del></p> <p>Percentage of new community facilities located in or within <u>8400m</u> of a centre.</p> <p><u>Delivery of early years, primary, secondary and post-16 education infrastructure proposals identified in Table 8A by 2036.</u></p> <p>TARGETS</p> <p><del>To improve educational attainment, health and wellbeing.</del></p> <p><u>To deliver a new health care centre at IP005 Former Tooks Bakery by 2036.</u></p> <p><u>To deliver the essential early years, primary, secondary and post-16 education infrastructure proposals identified in Table 8A by 2036.</u></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.

			<u>100% of new community facilities to be within 400m of a centre'</u>	
MM149	211	Objective 11	<p>Amend Objective 11: Inequality, to read as follows:</p> <p><b>'OBJECTIVE 11: INEQUALITY</b></p> <p><b>To tackle deprivation and inequalities across the town and create a safer more cohesive town.</b></p> <p>INDICATOR(S)</p> <p><del>Unemployment rates.</del></p> <p><del>Educational attainment levels.</del></p> <p>Proportion of the population who live in wards that rank within the most deprived 10% and 25% in the country.</p> <p><u>Indices of multiple deprivation (income, employment, health deprivation and disability, education, skills training, crime, barriers to housing and services and living environment).</u></p> <p><del>Reported crime in the Borough.</del></p> <p><u>Number of affordable homes provided in the monitoring year.</u></p> <p><u>Number of new outdoor youth fitness facilities in the Borough.</u></p> <p>TARGETS</p> <p>To improve Ipswich's rank in the indices of multiple deprivation by 2036 and reduce crime levels by 2036.</p> <p><u>The Council to build 1000 new Council/affordable homes in a decade (Council adopted target).</u></p> <p><u>At least 60% of affordable housing provision to consist of affordable housing for rent including social rent and the remainder affordable home ownership.</u></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.

			<p><u>Impact of designing out crime on antisocial behaviour statistics to reduce by a minimum of 25% by 2036 (from 2020 baseline).</u></p> <p><u>Increase youth outdoor fitness provision by 25% in the Borough by 2036.'</u></p>	
MM150	211	Objective 12	<p>Amend Objective 12: Digital Infrastructure, to read as follows:</p> <p><b>'OBJECTIVE 12: DIGITAL INFRASTRUCTURE</b></p> <p><b>To improve digital infrastructure provision.</b></p> <p>INDICATOR(S)</p> <p>Average Broadband speeds.</p> <p>Proportion of residents with access to high speed and full fibre broadband.</p> <p>TARGETS</p> <p><del>To ensure that digital infrastructure meets the needs of current and future generations.</del></p> <p><u>On sites of more than 10 new residential dwellings and on other non-residential developments, 100% of developments to include provision of the infrastructure for the most up-to-date digital communications technology in order to allow connection to that network.'</u></p>	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.
MM151	212	Paragraph 12.1 & New Paragraph	<p>Amend paragraph 12.1 to read as follows:</p> <p>'The Local Plan Authority Monitoring Report will review the progress of these arrangements as well as progress on delivering the major projects and infrastructure requirements outlined in Chapter 10, and performance against the targets set out in Chapter 11. <u>Intelligence is drawn from a number of Council functions including strategic housing, economic development and environmental health and equally, feeds into other corporate strategies such as the Air Quality Strategy and the Strategic Housing Strategy.</u> Delivery of housing and jobs within the Ipswich</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, and for soundness

			<p>Strategic Planning Area will be monitored through a joint monitoring process with other relevant authorities.’</p> <p>Insert a new paragraph after paragraph 12.3 to read as follows:</p> <p><u>‘There is in addition, a statutory requirement to review the Local Plan within a period of 5 years, to determine whether it is still up to date. If by that stage parts of the Local Plan are out of date in terms of legislation or other matters, the local authority should either conduct a partial or full review of the Local Plan.’</u></p>	to ensure the Plan is consistent with national policy.						
MM152	220	Appendix 5	<p>Amend the definition of Affordable Housing in Appendix 5 Glossary, to read as follows:</p> <table border="1"> <thead> <tr> <th><b>‘Abbreviation</b></th> <th><b>Term in Full</b></th> <th><b>Definition</b></th> </tr> </thead> <tbody> <tr> <td></td> <td>Affordable Housing</td> <td> <p><del>Affordable housing includes affordable housing for rent and starter homes, discounted market sales housing and other affordable home ownership, provided to specified eligible households whose needs are not met by the market.</del></p> <p><u>Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</u></p> <p><u>a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for</u></p> </td> </tr> </tbody> </table>	<b>‘Abbreviation</b>	<b>Term in Full</b>	<b>Definition</b>		Affordable Housing	<p><del>Affordable housing includes affordable housing for rent and starter homes, discounted market sales housing and other affordable home ownership, provided to specified eligible households whose needs are not met by the market.</del></p> <p><u>Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</u></p> <p><u>a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for</u></p>	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.
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	Affordable Housing	<p><del>Affordable housing includes affordable housing for rent and starter homes, discounted market sales housing and other affordable home ownership, provided to specified eligible households whose needs are not met by the market.</del></p> <p><u>Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</u></p> <p><u>a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for</u></p>								



			<p><u>Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</u></p> <p><u>b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</u></p> <p><u>c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</u></p>	
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			<p>d) <u>Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.'</u></p>							
MM153	223	Appendix 5	<p>Amend definition of Density of Residential Development as follows:</p> <table border="0"> <tr> <td style="vertical-align: top;"><b>'Abbreviation</b></td> <td style="vertical-align: top;"><b>Term in full</b></td> <td style="vertical-align: top;"><b>Definition</b></td> </tr> <tr> <td></td> <td>Density of Residential Development</td> <td>High density refers to new housing development of at least 90 dwellings per hectare (dph). Medium density refers to new housing development of at least 40 dph <del>(the average will be taken as 45 dph)</del>. Low density refers to new housing development <del>under of at least 40 dph (the average will be taken as 35 dph).</del></td> </tr> </table>	<b>'Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>		Density of Residential Development	High density refers to new housing development of at least 90 dwellings per hectare (dph). Medium density refers to new housing development of at least 40 dph <del>(the average will be taken as 45 dph)</del> . Low density refers to new housing development <del>under of at least 40 dph (the average will be taken as 35 dph).</del>	To reflect modifications to Policy DM23.
<b>'Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>								
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MM154	223	Appendix 5	<p>Insert new entry for First Homes:</p> <table border="0"> <tr> <td style="vertical-align: top;"><b>'Abbreviation</b></td> <td style="vertical-align: top;"><b>Term in full</b></td> <td style="vertical-align: top;"><b>Definition</b></td> </tr> <tr> <td></td> <td><u>First Homes</u></td> <td><u>First Homes are a specific kind of discounted market sale housing which meets the definition of 'affordable housing' for planning purposes. First</u></td> </tr> </table>	<b>'Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>		<u>First Homes</u>	<u>First Homes are a specific kind of discounted market sale housing which meets the definition of 'affordable housing' for planning purposes. First</u>	To reflect change in national policy.
<b>'Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>								
	<u>First Homes</u>	<u>First Homes are a specific kind of discounted market sale housing which meets the definition of 'affordable housing' for planning purposes. First</u>								

			<p>Homes must be discounted by a minimum of 30% against the market value and are sold to a person or persons meeting the First Homes eligibility criteria, including meeting the government’s definition of a first time buyer. On their first sale, First Homes will have a restriction registered on the title at HM Land Registry to ensure this discount is passed on at each subsequent title transfer. After the discount has been applied, the first sale must be at a price no higher than £250,000. First Homes are the government’s preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.’</p>							
MM155	226	Appendix 5	<p>Amend the definition of Planning Policy Guidance Note to read as follows:</p> <table border="0"> <thead> <tr> <th style="text-align: left;">‘Abbreviation</th> <th style="text-align: left;">Term in full</th> <th style="text-align: left;">Definition</th> </tr> </thead> <tbody> <tr> <td></td> <td>Planning Policy Practice Guidance Note</td> <td>Government documents providing policy and guidance on a range of planning issues such as housing, transport, conservation etc. <del>PPGs were being replaced by Planning Policy Statements, which have now been replaced by the National Planning Policy Framework. This sits alongside national planning policy contained in the National Planning Policy Framework.</del></td> </tr> </tbody> </table>	‘Abbreviation	Term in full	Definition		Planning Policy Practice Guidance Note	Government documents providing policy and guidance on a range of planning issues such as housing, transport, conservation etc. <del>PPGs were being replaced by Planning Policy Statements, which have now been replaced by the National Planning Policy Framework. This sits alongside national planning policy contained in the National Planning Policy Framework.</del>	To reflect the most up to date position in terms of Planning Practice Guidance.
‘Abbreviation	Term in full	Definition								
	Planning Policy Practice Guidance Note	Government documents providing policy and guidance on a range of planning issues such as housing, transport, conservation etc. <del>PPGs were being replaced by Planning Policy Statements, which have now been replaced by the National Planning Policy Framework. This sits alongside national planning policy contained in the National Planning Policy Framework.</del>								
MM156	230	Appendix 5	<p>Amend the definition of Travel Plans to read as follows:</p> <table border="0"> <thead> <tr> <th style="text-align: left;">‘Abbreviation</th> <th style="text-align: left;">Term in full</th> <th style="text-align: left;">Definition</th> </tr> </thead> <tbody> <tr> <td></td> <td>Travel Plans</td> <td>Travel Plans are long term management strategies for integrating proposals for sustainable travel into</td> </tr> </tbody> </table>	‘Abbreviation	Term in full	Definition		Travel Plans	Travel Plans are long term management strategies for integrating proposals for sustainable travel into	In accordance with the requirement in paragraph 16(d) of the NPPF for
‘Abbreviation	Term in full	Definition								
	Travel Plans	Travel Plans are long term management strategies for integrating proposals for sustainable travel into								

			<p>planning. <u>The primary purpose of a Travel Plan is to identify opportunities for the effective promotion and delivery of sustainable transport initiatives e.g. walking, cycling, public transport and tele-commuting, in connection with both proposed and existing developments.</u></p>	<p>policies to be clear and unambiguous.</p>						
MM157	230-231	Appendix 5	<p>Amend the definition of the Use Classes Order in Appendix 5 Glossary, to read as follows:</p> <table border="0"> <thead> <tr> <th style="text-align: left;"><b>'Abbreviation</b></th> <th style="text-align: left;"><b>Term in full</b></th> <th style="text-align: left;"><b>Definition</b></th> </tr> </thead> <tbody> <tr> <td></td> <td>Use Classes Order</td> <td> <p>The Town and Country Planning (Use Classes) Order 1987 and subsequent amendments.  Uses are defined as follows:  <del>A1 Shops</del>  <del>A2 Financial and Professional Services</del>  <del>A3 Restaurants and cafes</del>  <del>A4 Drinking establishments</del>  <del>A5 Hot food takeaways</del></p> <p><del>B1 Business (Offices (other than those that fall within A2), research and development of products and processes, light industry)</del>  B2 General industrial  B8 Storage or distribution  C1 Hotels  C2 Residential Institutions  C2A Secure Residential Institutions  C3 Dwellinghouses  C4 Houses in multiple occupation  <del>D1 Non-residential institutions</del>  <del>D2 Assembly and Leisure</del></p> </td> </tr> </tbody> </table>	<b>'Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>		Use Classes Order	<p>The Town and Country Planning (Use Classes) Order 1987 and subsequent amendments.  Uses are defined as follows:  <del>A1 Shops</del>  <del>A2 Financial and Professional Services</del>  <del>A3 Restaurants and cafes</del>  <del>A4 Drinking establishments</del>  <del>A5 Hot food takeaways</del></p> <p><del>B1 Business (Offices (other than those that fall within A2), research and development of products and processes, light industry)</del>  B2 General industrial  B8 Storage or distribution  C1 Hotels  C2 Residential Institutions  C2A Secure Residential Institutions  C3 Dwellinghouses  C4 Houses in multiple occupation  <del>D1 Non-residential institutions</del>  <del>D2 Assembly and Leisure</del></p>	<p>To reflect The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, to ensure consistency with national policy.</p>
<b>'Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>								
	Use Classes Order	<p>The Town and Country Planning (Use Classes) Order 1987 and subsequent amendments.  Uses are defined as follows:  <del>A1 Shops</del>  <del>A2 Financial and Professional Services</del>  <del>A3 Restaurants and cafes</del>  <del>A4 Drinking establishments</del>  <del>A5 Hot food takeaways</del></p> <p><del>B1 Business (Offices (other than those that fall within A2), research and development of products and processes, light industry)</del>  B2 General industrial  B8 Storage or distribution  C1 Hotels  C2 Residential Institutions  C2A Secure Residential Institutions  C3 Dwellinghouses  C4 Houses in multiple occupation  <del>D1 Non-residential institutions</del>  <del>D2 Assembly and Leisure</del></p>								

			<p><u>E(a) Display or retail sale of goods, other than hot food</u></p> <p><u>E(b) Sale of food and drink for consumption (mostly) on the premises</u></p> <p><u>E(c) Provision of:</u></p> <p style="padding-left: 40px;"><u>E(c)(i) Financial services,</u></p> <p style="padding-left: 40px;"><u>E(c)(ii) Professional services (other than health or medical services), or</u></p> <p style="padding-left: 40px;"><u>E(c)(iii) Other appropriate services in a commercial, business or service locality</u></p> <p><u>E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)</u></p> <p><u>E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)</u></p> <p><u>E(f) Creche, day nursery or day centre (not including a residential use)</u></p> <p><u>E(g) Uses which can be carried out in a residential area without detriment to its amenity:</u></p> <p style="padding-left: 40px;"><u>E(g)(i) Offices to carry out any operational or administrative functions,</u></p> <p style="padding-left: 40px;"><u>E(g)(ii) Research and development of products or processes</u></p> <p style="padding-left: 40px;"><u>E(g)(iii) Industrial processes</u></p> <p><u>F1 Learning and non-residential institutions – Use (not including residential use) defined in 7 parts:</u></p> <p style="padding-left: 40px;"><u>F1(a) Provision of education</u></p> <p style="padding-left: 40px;"><u>F1(b) Display of works of art (otherwise than for sale or hire)</u></p> <p style="padding-left: 40px;"><u>F1(c) Museums</u></p> <p style="padding-left: 40px;"><u>F1(d) Public libraries or public reading rooms</u></p>	
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			<p><u>F1(e) Public halls or exhibition halls</u>  <u>F1(f) Public worship or religious instruction (or in connection with such use)</u>  <u>F1(g) Law courts</u>  <u>F2 Local community – Use as defined in 4 parts:</u>  <u>F2(a) Shops (mostly) selling essential goods, including food, where the shop’s premises do not exceed 280 square metres and there is no other such facility within 1000 metres</u>  <u>F2(b) Halls or meeting places for the principal use of the local community</u>  <u>F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)</u>  <u>F2(d) Indoor or outdoor swimming pools or skating rinks</u></p> <p>Sui generis - uses not covered by the above including theatres, petrol filling stations, amusement centres, hot food takeaways, launderettes and taxi businesses.’</p>	
MM158	232	Appendix 6	<p>Amend paragraph 2.2 of Appendix 6 Marketing Requirements, to read as follows:</p> <p>‘This exercise should take all <del>considerable</del> <u>reasonable</u> steps to actively market the site and should consider a number of methods such as site notices, promotion through a land or estate agent, <del>and</del> <u>advertisement on</u> <del>in</del> <u>an estates gazette,</u> or through websites and information of all methods used should be provided to the Council. <u>The level of marketing of the site must be proportionate to the type and availability of the facility/ use that is being marketed. For example a commercial property should be published by an agent with expertise in marketing commercial uses and marketed at a geographical area (local, regional and/or national) based on the prevalence of this type of use/ facility (e.g. the more unique the existing use/ facility, the more widely it should be marketed).</u>’</p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.

MM159	237	New Appendix	<p>Insert new Appendix 9: Housing Trajectory as set out in Appendix 5 of this schedule.</p> <p>The Council submitted a housing trajectory alongside the Local Plan in June 2020. Where factual updates to site information became available during the Examination process, these were presented in updated versions of the housing trajectory submitted at the Inspectors' request after the Hearing (Core Documents K18 and K19). MM159 includes further revisions to the trajectory as follows, in response to the comments in Inspectors' post hearing letter about the deliverability of sites within the 5 year housing land supply (Core Document K28):</p> <ul style="list-style-type: none"> <li>• IP047 Land at Commercial Road – delivery is extended over four years rather than three, from 2023/24 to 2026/27, removing 41 dwellings from the five year supply.</li> <li>• IP061 Land at Lavenham Road – delivery is pushed back by one year to 2025/26 and 2026/27, removing 11 dwellings from the five year supply.</li> <li>• IP066 JJ Wilson, White Elm Street – delivery is pushed back by one year to 2026/27 and 2027/28, removing 22 dwellings from the five year supply.</li> <li>• IP135 112-116 Bramford Road – delivery is pushed back by one year to 2026/27, removing 19 dwellings from the five year supply.</li> <li>• IP354 72 Cullingham Road – capacity is reduced from 24 to 14 dwellings to reflect the submitted planning application.</li> <li>• Care home provision has been added to the housing trajectory: IP394 Henley House 37 dwellings equivalent; IP090 Silver Birch Care Home 42 dwellings equivalent; and Phases 4 and 5 Westerfield House 21 dwellings equivalent.</li> <li>• ISPA4.1 Land at the northern end of Humber Doucy Lane – capacity reduced from 489 to 449 dwellings to reflect revised capacity estimate.</li> </ul>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.
MM160	N/A	Plan 2: Flood Risk	<p>Amend the Key to Plan 2: Flood Risk to read as follows:</p> <p><u>'This plan of nationally designated flood zones relates to fluvial and tidal flooding and is based indicatively on mapped data from the Environment Agency. Further information on pluvial (surface water) flooding can be found in the Strategic Flood Risk Assessment (SFRA).'</u></p>	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.
MM161	N/A	Plan 5: Ipswich	Amend Plan 5: Ipswich Ecological Network, as set out in Appendix 7 of this schedule.	In accordance with the

		Ecological Network	The Ipswich Ecological Network has been updated to reflect the findings of the Ipswich Wildlife Audit (2019). The updates are explained in detail in Appendix 8 of this schedule.	requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.
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**Appendix 1: Amendments to Table 8.1 (MM9)**

Table 8.1 – Objectively Assessed Housing Need across the Ipswich Housing Market Area based on the standard method

	SHMA annual	SHMA total (2014-2036)	Standard method annual (Sept 2017)	Standard method total (2016 – 2036)	Standard method annual (2016-based)	Standard method total (2016-based) (2018-2036)	Standard method annual (2014-based)	Standard method total (2014-based) (2018-2036)	Standard method annual (2014 based, 2018 ratios)	Standard method total (2014 based, 2018 ratios, 2018 – 36)	Standard method annual (2014 based, 2019 ratios)	Standard method total (2014 based, 2019 ratios, 2018 – 36)
<b>Babergh</b>	355	7,820	439	8,780	420	7,560	420	7,560	420	7,560	<u>416</u>	<u>7,488</u>
<b>Ipswich</b>	519	11,420	442	8,840	479	8,622	445	8,010	445	8,010	<u>460</u>	<u>8,280</u>
<b>Mid Suffolk</b>	452	9,951	573	11,460	590	10,620	585	10,530	556	10,008	<u>535</u>	<u>9,360-9,630</u>
<b>Suffolk Coastal</b>	460	10,111	495	9,900	582	10,476	515	9,270	542	9,756	<u>489<sup>2</sup></u>	<u>8,802</u>
<b>Total</b>	1,786	39,302	1,949	38,980	2,071	37,278	1,965	35,370	1,963	35,334	<u>1,900</u>	<u>34,200</u>

Note: the Babergh figure of 420 p.a. includes the application of a cap on the uplift, as allowed for by the methodology.

<sup>2</sup> Following the creation of East Suffolk Council to replace the former Suffolk Coastal and Waveney District Councils from 1st April 2019, the affordability ratios for 2019 (published in March 2020) are at the East Suffolk level. The East Suffolk affordability ratio is therefore used in this calculation.

**Appendix 2: Amendments to Table 3 (MM35)**

**TABLE 3 HOUSING LAND SUPPLY AND MINIMUM REQUIREMENT AT 1<sup>st</sup> APRIL ~~2020~~2019**

		<b>Number of</b>	<b>Discounted Numbers</b>	<b>Cumulative Numbers</b>
1	Completions 1 <sup>st</sup> April 2018 to 31 <sup>st</sup> March <del>2019</del> 2020	<u>644223</u>	-	<u>644223</u>
2	Dwellings under construction	<u>449544</u>	-	<u>1,093767</u>
3	Dwellings with planning permission (including <u>1,915 dwellings at Ipswich Garden Suburb</u> )	<u>2,846846</u>	<del>761</del> <u>2,561</u>	<del>1,5283,654</del>
4	Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	<u>217424</u>	<del>382</del> <u>195</u>	<del>1,9103,849</del>
5	Number of dwellings required on new site allocations and on windfall sites to 2036	<u>4,4316,100</u>		<u>8,0108,280</u>

**TABLE NOTES**

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

*Line 2: Dwellings under construction at 31<sup>st</sup> March ~~2020~~2019 - assumed that all will be completed over the plan period.*

*Line 3: Other dwellings with planning permission at 31<sup>st</sup> March ~~2019~~2020 - assumed that 10% of these will not be completed.*

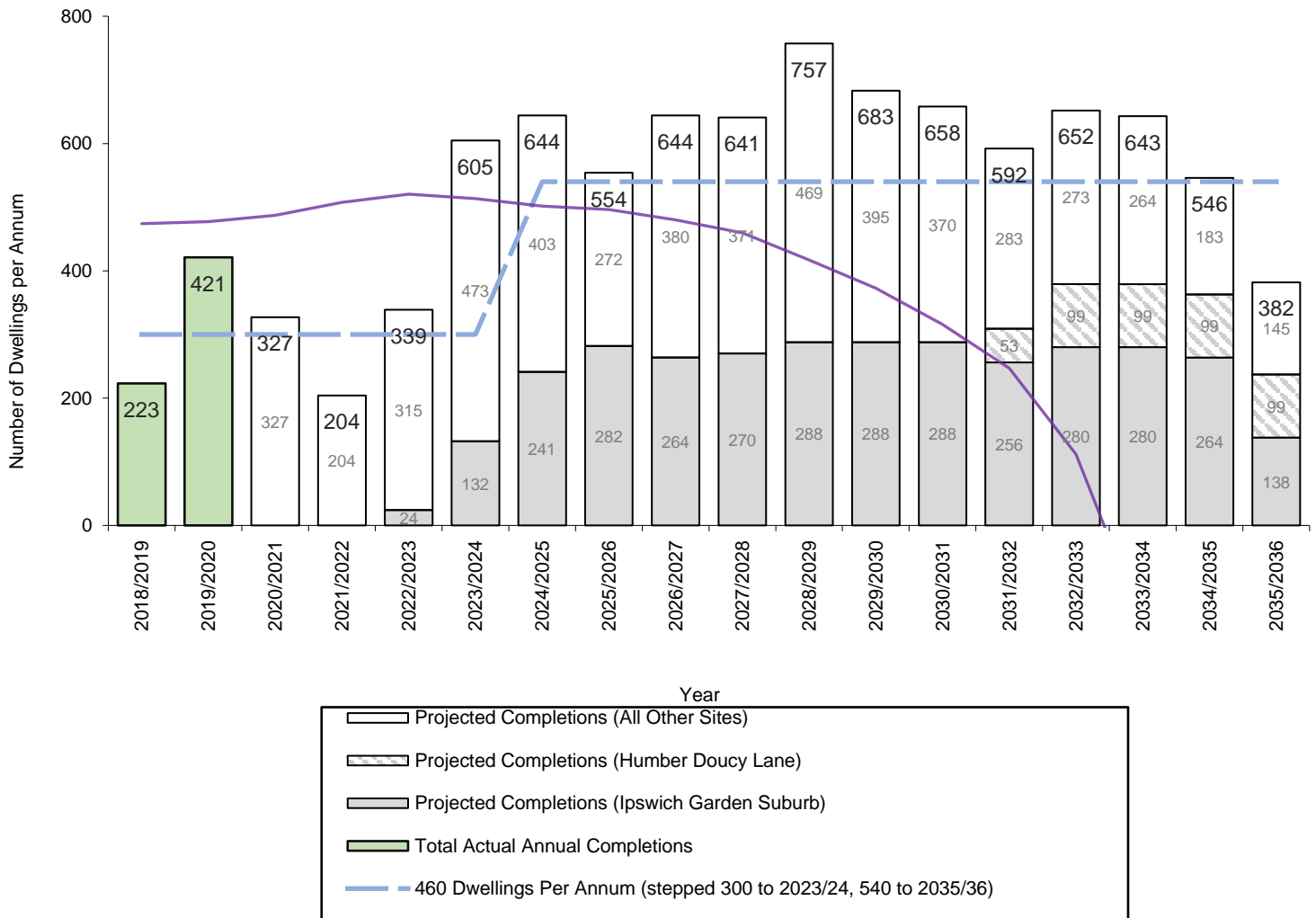
*Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31<sup>st</sup> March ~~2019~~2020 - assumed that 10% of these will not be completed.*

*Line 5: To reach the minimum requirement of 8,0108,280 dwellings by 2036, together with windfall sites, further land will need to be allocated within the Borough for at least 6,1004,431 new homes.*

**Appendix 3: New Diagram: Housing Trajectory (MM39)**

**New Diagram Ipswich housing trajectory at 1<sup>st</sup> April 2020**

**Housing Trajectory 1<sup>st</sup> April 2020**  
**Completions since 2018 and projections to 2036**



[The figures in this housing trajectory schedule have been updated post submission to reflect the evidence provided in Core Documents K18 and K19 and the comments in the Inspectors’ post hearing letter (K28)]

**Appendix 4: Amendments to Table 4 (MM40)**

**TABLE 4 ESTIMATED HOUSING DELIVERY FOR ~~2019~~2020-2036 EXCLUDING CURRENT PERMISSIONS AS AT 1<sup>ST</sup> APRIL ~~2019~~2020**

Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings <del>2019</del> 2020-2036
IP-One	100%	<del>2,034</del> <u>2,246</u>
Rest of built up area	<del>83%</del> <u>72.1%</u>	<del>716 (PDL:594)</del> <u>634 (PDL: 457)</u>
Ipswich Garden Suburb (see policy CS10) (A further <u>1,915 dwellings at IGS have outline planning permission</u> )	0%	<del>3,268</del> <u>1,380</u>
Northern end of Humber Doucy Lane (see Policy ISPA4)	0%	<del>496</del> <u>449</u>
Total <del>2019</del> <u>2020</u> -2036 (excluding windfall)	<del>40.3%</del> <u>57.4%</u>	<del>6,514 (PDL: 2,628)</del> <u>4,709 (PDL: 2,703)</u>
Windfall sites <del>2022</del> <u>2023</u> – 2036	90%	<del>700</del> <u>650</u> (PDL: <del>630</del> <u>585</u> )
Total <del>2019</del> <u>2020</u> -2036	<del>45.2%</del> <u>61.4%</u>	<del>7,214 (PDL: 3,258)</del> <u>5,359 (PDL: 3,288)</u>

**Appendix 5: New Appendix: Housing Trajectory (MM159)**

New Appendix 9 Ipswich Housing Trajectory at 1<sup>st</sup> April 2020

<u>Site Reference</u>	<u>Planning application ref.</u>	<u>Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)</u>	<u>Name and address of site</u>	<u>Greenfield/Brownfield</u>	<u>Site Area</u>	<u>Dwellings built to date</u>	<u>Residual completions expected by 2036</u>	<u>Total number of dwellings on site</u>	<u>No. residual expected to be completed in 5 years</u>	<u>2020/21 (Current)</u>	<u>2021/22 (Yr 1)</u>	<u>2022/23 (Yr 2)</u>	<u>2023/24 (Yr 3)</u>	<u>2024/25 (Yr 4)</u>	<u>2025/26 (Yr 5)</u>	<u>2026/27 (Yr 6)</u>	<u>2027/28 (Yr 7)</u>	<u>2028/29 (Yr 8)</u>	<u>2029/30 (Yr 9)</u>	<u>2030/31 (Yr 10)</u>	<u>2031/32 (Yr 11)</u>	<u>2032/33 (Yr 12)</u>	<u>2033/34 (Yr 13)</u>	<u>2034/35 (Yr 14)</u>	<u>2035/36 (Yr 15)</u>	<u>Total Identified Supply</u>
IP003		Allocation (SP2)	Waste Tip & Employment Area IP1 2DW (north of Sir Alf Ramsey Way)	B	1.41	0	114	114	0	-	-	-	-	-	-	-	-	-	-	-	-	25	30	34	25	114
IP004	UC004	Allocation (SP2)	Bus depot, Sir Alf Ramsey Way IP1 2DP	B	1.07	0	48	48	0	-	-	-	-	-	-	-	-	-	-	24	24	-	-	-	-	48
IP005	16/00969	Full - approved (SP3)	Former Tooks Bakery, 731 Old Norwich Road	B	1.98	0	60	60	0	60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	60
IP009	UC009	Allocation (SP2)	Victoria Nurseries, 1 Kettlebaston Way IP4 2XX	B	0.39	0	12	12	0	-	-	-	-	-	-	12	-	-	-	-	-	-	-	-	-	12
IP010a	UC010 part a	Allocation (SP2)	Former Co-op Depot, Derby Road & Hines Road	B	2.22	0	75	75	0	-	-	-	-	-	-	-	-	25	25	25	-	-	-	-	-	75
IP010b	UC010 part b	Allocation (SP2)	Felixstowe Road (237 to 297)	B	2.79	0	62	62	0	-	-	-	-	-	-	-	-	-	31	31	-	-	-	-	-	62
IP011a	UC011 part	Allocation (SP2)	Former Gym and Trim Health Club, Lower Orwell Street IP4 1BU	B	0.16	0	18	18	0	-	-	-	-	-	-	18	-	-	-	-	-	-	-	-	-	18
IP011b	UC011 part	Allocation (SP2)	Eastern Counties Bus Depot, Foundation Street IP4 1BQ and 6 Smart Street IP4 1BP	B	0.62	0	56	56	0	-	-	-	-	-	-	-	-	-	-	-	28	28	-	-	-	56
IP011c	UC011 part	Allocation (SP2)	Car Park, Smart Street	B	0.08	0	7	7	0	-	-	-	-	-	-	-	-	7	-	-	-	-	-	-	-	7

<u>Site Reference</u>	<u>Planning application ref.</u>	<u>Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)</u>	<u>Name and address of site</u>	<u>Greenfield/Brownfield</u>	<u>Site Area</u>	<u>Dwellings built to date</u>	<u>Residual completions expected by 2036</u>	<u>Total number of dwellings on site</u>	<u>No. residual expected to be completed in 5 years</u>	<u>2020/21 (Current)</u>	<u>2021/22 (Yr 1)</u>	<u>2022/23 (Yr 2)</u>	<u>2023/24 (Yr 3)</u>	<u>2024/25 (Yr 4)</u>	<u>2025/26 (Yr 5)</u>	<u>2026/27 (Yr 6)</u>	<u>2027/28 (Yr 7)</u>	<u>2028/29 (Yr 8)</u>	<u>2029/30 (Yr 9)</u>	<u>2030/31 (Yr 10)</u>	<u>2031/32 (Yr 11)</u>	<u>2032/33 (Yr 12)</u>	<u>2033/34 (Yr 13)</u>	<u>2034/35 (Yr 14)</u>	<u>2035/36 (Yr 15)</u>	<u>Total Identified Supply</u>
IP012	UC012	Allocation (SP2)	52 to 60 Grimwade Street IP4 1LP & Portia House Star Lane IP4 1JN (Peter's Ice Cream)	B	0.32	0	35	35	0	-	-	-	-	-	-	35	-	-	-	-	-	-	-	-	-	35
IP014	-	Allocation (SP2)	92 - 94 and Hope Church, 114 Fore Hamlet IP3 8AF	B	0.21	0	25	25	25	-	-	-	25	-	-	-	-	-	-	-	-	-	-	-	-	25
IP015	UC015	Allocation (SP2)	Car Park, West End Road	B	1.22	0	67	67	0	-	-	-	-	-	-	-	-	25	30	12	-	-	-	-	-	67
IP031a	UC032	Allocation (SP2)	Car Park, Burrell Road	B	0.44	0	20	20	0	-	-	-	-	-	-	-	-	20	-	-	-	-	-	-	-	20
IP031b	19/00369	Full S106 (SP3)	22 Stoke Street IP2 8BX	B	0.18	0	31	31	31	-	-	31	-	-	-	-	-	-	-	-	-	-	-	-	-	31
IP032	UC033	Allocation (SP2)	King George V Field, Old Norwich Rd	G	3.7	0	99	99	0	-	-	-	-	-	-	-	-	-	-	33	33	33	-	-	-	99
IP033	UC034	Allocation (SP2)	Land at Bramford Road (Stocks site)	G	2.03	0	55	55	0	-	-	-	-	-	-	-	27	28	-	-	-	-	-	-	-	55
IP035	-	Allocation (SP2)	Key Street/Star Lane (St Peter's Port)	B	0.54	0	86	86	0	-	-	-	-	-	-	-	40	46	-	-	-	-	-	-	-	86
IP037	UC038	Allocation (SP2)	Island site	B	6.02	0	421	421	0	-	-	-	-	-	-	-	-	-	-	55	70	75	75	76	70	421
IP039a	UC040	Allocation (SP2)	Land between Gower Street and Great Whip Street	B	0.48	0	45	45	0	-	-	-	-	-	-	-	-	-	-	-	-	-	22	23	-	45
IP040	-	Allocation (SP2)	Civic Centre area, Civic Drive	B	0.73	0	59	59	0	-	-	-	-	-	-	-	-	-	25	34	-	-	-	-	-	59
IP041	-	Allocation (SP2)	Former Police Station, Civic Drive	B	0.52	0	58	58	0	-	-	-	-	-	-	20	38	-	-	-	-	-	-	-	-	58
IP042	15/01040/OUT withdrawn	Allocation (SP2)	Land between Cliff Quay and Landseer Road	B	1.64	0	222	222	0	-	-	-	-	-	-	-	74	74	74	-	-	-	-	-	-	222

<u>Site Reference</u>	<u>Planning application ref.</u>	<u>Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)</u>	<u>Name and address of site</u>	<u>Greenfield/Brownfield</u>	<u>Site Area</u>	<u>Dwellings built to date</u>	<u>Residual completions expected by 2036</u>	<u>Total number of dwellings on site</u>	<u>No. residual expected to be completed in 5 years</u>	<u>2020/21 (Current)</u>	<u>2021/22 (Yr 1)</u>	<u>2022/23 (Yr 2)</u>	<u>2023/24 (Yr 3)</u>	<u>2024/25 (Yr 4)</u>	<u>2025/26 (Yr 5)</u>	<u>2026/27 (Yr 6)</u>	<u>2027/28 (Yr 7)</u>	<u>2028/29 (Yr 8)</u>	<u>2029/30 (Yr 9)</u>	<u>2030/31 (Yr 10)</u>	<u>2031/32 (Yr 11)</u>	<u>2032/33 (Yr 12)</u>	<u>2033/34 (Yr 13)</u>	<u>2034/35 (Yr 14)</u>	<u>2035/36 (Yr 15)</u>	<u>Total Identified Supply</u>
IP043	UC044	Allocation (SP2)	47 Key Street and Slade Street Car Park, Star Lane	B	0.7	0	50	50	0	-	-	-	-	-	-	-	25	25	-	-	-	-	-	-	-	50
IP047	08/00953 & 19/00148	Allocation (SP2)	Land at Commercial Road	B	3.11	0	173	173	132	-	-	-	44	44	44	41	-	-	-	-	-	-	-	-	-	173
IP048a	UC051	Allocation (SP2)	Mint Quarter (east)	B	1.33	0	53	53	0	-	-	-	-	-	-	-	-	26	27	-	-	-	-	-	-	53
IP048b	-	Allocation (SP2)	Mint Quarter (west)	B	1.34	0	36	36	0	-	-	-	-	-	-	-	-	-	36	-	-	-	-	-	-	36
IP048c	18/00740	Prior Approval - approved (SP3)	6-10 Cox Lane and 36-46 Carr Street (upper floors)	B	0.23	0	33	33	0	33	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	33
IP054a	16/01037	Full - approved (SP3)	30 Lower Brook Street	B	0.56	0	62	62	62	-	-	-	-	62	-	-	-	-	-	-	-	-	-	-	-	62
IP054b	-	Allocation (SP2)	Land between Old Cattle Market and Star Lane	B	1.08	0	40	40	0	-	-	-	-	-	-	-	-	-	-	40	-	-	-	-	-	40
IP059	16/01220	Outline (S106) (SP3)	Elton Park Industrial Estate, Hadleigh Road	B	2.97	0	103	103	68	-	-	-	-	34	34	35	-	-	-	-	-	-	-	-	-	103
IP061	UC064	Allocation (SP2)	Former School Site, Lavenham Road	G	0.9	0	23	23	12	-	-	-	-	-	12	11	-	-	-	-	-	-	-	-	-	23
IP064a	-	Allocation (SP2)	Land between Holywells Road and Holywells Park	B	1.2	0	66	66	0	-	-	-	-	-	-	-	33	33	-	-	-	-	-	-	-	66
IP066	UC069	Allocation (SP2)	JJ Wilson, White Elm Street and land to rear at Cavendish Street	B	0.85	0	55	55	0	-	-	-	-	-	-	22	33	-	-	-	-	-	-	-	-	55
IP067a	-	Allocation (SP2)	Former British Energy site (north)	B	0.38	0	17	17	0	-	-	-	-	-	-	-	-	-	-	-	-	-	17	-	-	17

<u>Site Reference</u>	<u>Planning application ref.</u>	<u>Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)</u>	<u>Name and address of site</u>	<u>Greenfield/Brownfield</u>	<u>Site Area</u>	<u>Dwellings built to date</u>	<u>Residual completions expected by 2036</u>	<u>Total number of dwellings on site</u>	<u>No. residual expected to be completed in 5 years</u>	<u>2020/21 (Current)</u>	<u>2021/22 (Yr 1)</u>	<u>2022/23 (Yr 2)</u>	<u>2023/24 (Yr 3)</u>	<u>2024/25 (Yr 4)</u>	<u>2025/26 (Yr 5)</u>	<u>2026/27 (Yr 6)</u>	<u>2027/28 (Yr 7)</u>	<u>2028/29 (Yr 8)</u>	<u>2029/30 (Yr 9)</u>	<u>2030/31 (Yr 10)</u>	<u>2031/32 (Yr 11)</u>	<u>2032/33 (Yr 12)</u>	<u>2033/34 (Yr 13)</u>	<u>2034/35 (Yr 14)</u>	<u>2035/36 (Yr 15)</u>	<u>Total Identified Supply</u>
IP074	16/01179	Full - expired (SP3)	Land at Upper Orwell Street	B	0.07	0	0	0	0	-	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	0
IP080	UC085	Allocation (SP2)	240 Wherstead Road	B	0.49	0	27	27	0	-	-	-	-	-	-	27	-	-	-	-	-	-	-	-	-	27
IP084a	18/01117	Full (S106) (SP3)	County Hall, St Helen's Street	B	0.32	0	40	40	40	-	-	-	-	40	-	-	-	-	-	-	-	-	-	-	-	40
IP089	UC096	Allocation (SP2)	Waterworks Street	B	0.31	0	23	23	0	-	-	-	-	-	-	-	-	-	-	-	-	23	-	-	-	23
IP090	17/00076	Full approved	Silver Birch Care Home, 3 Europa Way (75 bed care home – 42 equivalent dwellings*)	B	0.45	0	42	42	0	42	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	42
IP096	19/00768 /FUL pending	Allocation (SP2)	Car Park Handford Rd East	B	0.22	0	22	22	22	-	-	-	22	-	-	-	-	-	-	-	-	-	-	-	-	22
IP098	UC111	Allocation (SP2)	Transco, south of Patteson Road	B	0.57	0	62	62	0	-	-	-	-	-	-	-	-	-	-	30	32	-	-	-	-	62
IP105	UC129	Allocation (SP2)	Depot, Beaconsfield Road	B	0.34	0	15	15	0	-	-	-	-	-	-	-	-	-	15	-	-	-	-	-	-	15
IP106	18/00032 & 19/00045	Full - approved (SP3)	391 Bramford Road	G	0.33	0	11	11	11	-	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11
IP109	12/00192	Full (S106) (SP3)	The Drift, Woodbridge Road	B	0.42	0	6	6	6	-	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	6
IP116a	16/00659 19/00070 /FUL amends total to 51	Reserved Matters - approved (SP3)	Former St Clements Hospital, Foxhall Road	B	1.7	34	17	51	5	12	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17



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IP116b	16/00677	Reserved Matters - approved (SP3)	St Clements Hospital Grounds, Foxhall Road	G	6.6	150	29	179	0	29	-	-	-	-	-	-	-	-	-	-	-	-	-	-	29	
IP119	-	Allocation (SP2)	Land East of West End Road	B	0.61	0	28	28	0	-	-	-	-	-	-	-	-	-	-	-	-	28	-	-	28	
IP120b	-	Allocation (SP2)	Land West of West End Road	B	1.03	0	103	103	0	-	-	-	-	-	-	-	-	-	-	-	22	39	42	-	-	103
IP125	-	Allocation (SP2)	Corner of Hawke Road and Holbrook Road	B	0.25	0	15	15	15	-	-	-	15	-	-	-	-	-	-	-	-	-	-	-	-	15
IP131	18/00552	Full - approved (SP3)	45 Milton Street	B	0.28	0	9	9	9	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	9
IP132	10/00343	Allocation (SP2) (Full - expired)	Former St Peters Warehouse Site, 4 College Street / Bridge Street (Northern Quays west)	B	0.18	0	73	73	0	-	-	-	-	-	-	-	-	36	37	-	-	-	-	-	-	73
IP133	10/00418	Allocation (SP2) (Full - expired)	South of Felaw Street	B	0.37	0	45	45	0	-	-	-	-	-	-	-	-	-	45	-	-	-	-	-	-	45
IP135	11/00247	Allocation (SP2) (Outline - expired)	112 - 116 Bramford Road	B	0.17	0	19	19	0	-	-	-	-	-	-	19	-	-	-	-	-	-	-	-	-	19
IP136	UC251	Allocation (SP2)	Silo, College Street	B	0.16	0	48	48	0	-	-	-	-	-	-	-	-	-	-	24	24	-	-	-	-	48
IP142	UC259 17/00570	Full - approved (SP3)	Land at Duke Street	B	0.39	0	44	44	44	-	-	-	-	-	44	-	-	-	-	-	-	-	-	-	-	44

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IP143	17/00769	SP3 (Outline – approved)	Former Norsk Hydro Ltd, Sandyhill Lane	B	4.5	0	85	85	85	-	-	-	40	45	-	-	-	-	-	-	-	-	-	-	-	85
IP150a (part)	07/00765 part	Outline - approved (SP3)	Land south of Ravenswood (sites U, V and W)	B	2.23	0	96	96	96	-	-	50	46	-	-	-	-	-	-	-	-	-	-	-	-	96
IP150d	-	Allocation (SP2)	Land south of Ravenswood (Sports Park)	B	1.8	0	34	34	0	-	-	-	-	-	-	-	-	34	-	-	-	-	-	-	-	34
IP150e	-	Allocation (SP2)	Land south of Ravenswood	B	3.6	0	126	126	84	-	-	-	-	42	42	42	-	-	-	-	-	-	-	-	-	126
IP161	19/00065	Full - approved (SP3)	2 Park Road	B	0.35	0	14	14	14	-	-	-	14	-	-	-	-	-	-	-	-	-	-	-	-	14
IP165	17/00795	Full - approved (SP3)	Eastway Business Park, Europa Way	B	2.08	86	8	94	0	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8
IP169	15/00393	Full - approved (SP3)	23-25 Burrell Road	B	0.08	10	4	14	0	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4
IP172	UC088 08/00511	Allocation (SP2) (Full - expired)	15-19 St Margaret's Green	B	0.08	0	9	9	0	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	9
IP188	19/00173	Full – approved (SP3)	Websters Saleyard site, Dock Street	B	0.11	0	9	9	9	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	9
IP200	17/00382 also 05/00819 11/00432 & 13/00346	Full - approved (SP3)	Griffin Wharf, Bath Street	B	4.7	131	71	202	35	36	-	35	-	-	-	-	-	-	-	-	-	-	-	-	-	71

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IP205	02/01241 19/00624	Full - approved and S106 (SP3)	Burton's, College Street	B	0.1	71	9	80	9	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	9
IP206	04/00313	Full - approved (SP3)	Cranfields	B	0.71	196	124	320	0	-	-	-	-	-	-	42	42	40	-	-	-	-	-	-	-	124
IP206	16/00092 /VC	Full - approved (SP3)	Cranfields (Mill House)	B	-	33	10	43	0	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10
IP218	15/00422	Prior Approval - approved	31-37 St Helen's Street	B	0.4	12	3	15	3	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	3
IP221	06/01007	Allocation (SP2) (Full - expired)	Flying Horse PH, 4 Waterford Road	B	0.35	0	12	12	0	-	-	-	-	-	-	-	-	-	-	12	-	-	-	-	-	12
IP234	06/01176 19/0062	Full - approved & pending	Land adjacent 30 Gibbons Street	B	0.03	0	2	2	2	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	2
IP245	18/00899	Full - approved (SP3)	12-12a Arcade Street	B	0.06	0	14	14	14	-	-	14	-	-	-	-	-	-	-	-	-	-	-	-	-	14
IP256	16/00987	Full - approved (SP3)	Artificial Hockey Pitch, Ipswich Sports Club, Henley Road	B	0.87	0	28	28	28	-	-	-	28	-	-	-	-	-	-	-	-	-	-	-	-	28
IP268	13/00625	Full - approved	Burlington Road	B	0.26	6	2	8	0	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2
IP274	16/00763	Full (S106) (SP3)	Old Norwich Road (rear of Maypole PH)	G	0.39	0	11	11	11	-	-	11	-	-	-	-	-	-	-	-	-	-	-	-	-	11

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IP279a	18/00470	Prior Approval - approved (SP3)	Former British Telecom, Bibb Way	B	0.63	0	78	78	78	-	-	78	-	-	-	-	-	-	-	-	-	-	-	-	-	78
IP279b (1)	-	Allocation (SP2)	North of former British Telecom offices, Bibb Way fronting Handford Road	B	0.4	0	35	35	35	-	-	-	35	-	-	-	-	-	-	-	-	-	-	-	-	35
IP279b (2)	-	Allocation (SP2)	South of former British Telecom offices, Bibb Way	B	0.62	0	37	37	37	-	-	-	37	-	-	-	-	-	-	-	-	-	-	-	-	37
IP280	14/01039 & 17/00489 /VC	Full – approved (SP3) and Full approved	Phase 4 Westerfield House, Humber Doucy Lane	B	0.03	0	7	7	7	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7
IP280	14/01039 & 17/00489 /VC	Full – approved (SP3) and Full approved	Phase 5 Westerfield House, Humber Doucy Lane (38 bed care home – 21 equivalent dwellings*)	B	0.03	0	21	21	21	-	21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21
IP280	18/00526	Outline - approved (SP3)	Care Village at Westerfield House, Humber Doucy Lane	G	3.44	0	149	149	149	-	-	-	50	65	34	-	-	-	-	-	-	-	-	-	-	149
IP283	17/00049	Full - approved (SP3)	25 Grimwade Street, Student Union Club and adjacent car park, Rope Walk	B	0.27	0	14	14	14	-	-	14	-	-	-	-	-	-	-	-	-	-	-	-	-	14
IP285 (part)	19/00737	Full approved	Land rear of 28 - 50 Freehold Road and 17 Kemball Street	G	0.16	0	5	5	5	-	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5
IP290	17/00320	Full - approved	The Great White Horse Hotel, 45 Tavern Street	B	0.02	0	6	6	0	-	-	-	-	-	-	6	-	-	-	-	-	-	-	-	-	6

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IP307	-	Allocation (SP2)	Prince of Wales Drive	B	0.27	0	15	15	15	-	-	15	-	-	-	-	-	-	-	-	-	-	-	-	-	15	
IP309	-	Allocation (SP2)	Former Bridgeward Social Club, 68a Austin Street and land to rear	B	0.29	0	15	15	15	-	-	-	-	15	-	-	-	-	-	-	-	-	-	-	-	-	15
IP333	19/00325	Full approved	Land rear of 133 to 139 Valley Road	G	0.49	0	7	7	7	-	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7
IP354	-	Allocation (SP2)	72 (Old Boatyard) Cullingham Road	B	0.34	0	14	14	14	-	-	-	14	-	-	-	-	-	-	-	-	-	-	-	-	-	14
IP355	-	Allocation (SP2)	77-79 Cullingham Road	B	0.06	0	6	6	6	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	6
IP358	18/00374	Prior Approval - approved	Saxon House, 1 Cromwell Square	B	0.07	0	34	34	34	-	34	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	34
IP360	18/00496	Prior Approval - approved	2 Turret Lane	B	0.1	0	6	6	0	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
IP361	18/00549	Prior Approval - approved	3-4 Lower Brook Mews	B	0.02	0	6	6	6	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
IP362	18/00675 19/00901	Prior Approval & Full – approved	39 Princes Street	B	0.03	0	15	15	15	-	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15
IP363	18/00685 19/00202	Prior Approval & Full – approved	Foundation House, 34 Foundation Street	B	0.1	0	14	14	0	14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	14
IP364	18/01063	Full - approved	28-32 Museum Street	B	0.03	0	9	9	0	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9
IP365	18/01070	Prior Approval - approved	15-17 Princes Street	B	0.05	0	14	14	14	-	14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	14

<u>Site Reference</u>	<u>Planning application ref.</u>	<u>Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)</u>	<u>Name and address of site</u>	<u>Greenfield/Brownfield</u>	<u>Site Area</u>	<u>Dwellings built to date</u>	<u>Residual completions expected by 2036</u>	<u>Total number of dwellings on site</u>	<u>No. residual expected to be completed in 5 years</u>	<u>2020/21 (Current)</u>	<u>2021/22 (Yr 1)</u>	<u>2022/23 (Yr 2)</u>	<u>2023/24 (Yr 3)</u>	<u>2024/25 (Yr 4)</u>	<u>2025/26 (Yr 5)</u>	<u>2026/27 (Yr 6)</u>	<u>2027/28 (Yr 7)</u>	<u>2028/29 (Yr 8)</u>	<u>2029/30 (Yr 9)</u>	<u>2030/31 (Yr 10)</u>	<u>2031/32 (Yr 11)</u>	<u>2032/33 (Yr 12)</u>	<u>2033/34 (Yr 13)</u>	<u>2034/35 (Yr 14)</u>	<u>2035/36 (Yr 15)</u>	<u>Total Identified Supply</u>
IP366	19/00028	Full - approved	6 Lower Brook Street	B	0.03	0	8	8	8	-	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8
IP371	18/00160	Full - approved	The Mason's Public House, 79 Victoria Street	B	0.06	0	8	8	8	-	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8
IP383	19/00969	Full approved	Aaron House, Finchley Road IP4 2HU	B	0.17	0	6	6	6	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	6
IP386	19/01118	Full (S106) (SP3)	28-50 Grimwade Street	B	0.15	0	13	13	13	-	-	13	-	-	-	-	-	-	-	-	-	-	-	-	-	13
IP387	19/01119	Full pending	Lockup garages and amenity area adjacent 14 Emmanuel Close	B	0.07	0	6	6	6	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
IP388	19/01122	Full pending	Lockup garages rear of 70 to 84 Sheldrake Drive	B	0.24	0	8	8	8	-	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8
IP389	19/01129	Full approved	Lockup garages rear of 32 to 40 Mallard Way	B	0.18	0	6	6	6	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
IP392	19/00159	Full approved	Highview Hotel, 56 Belstead Road IP2 8BE	B	0.19	0	8	8	8	-	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8
IP394	18/00064	Full approved	Henley House, 333 Henley Road (66 bed care home – 37 equivalent dwellings*)	B	0.7	0	37	37	0	37	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	37
IP180 (part)	16/00608	Strategic Development Site (Outline approved)	Ipswich Garden Suburb Phase N2a (Crest - North of Railway and east of Henley Road) 20/00245/REM pending	G	42.7	0	1,100	1,100	343	-	-	24	90	115	114	96	102	120	120	120	50	50	50	49	-	1,100

<u>Site Reference</u>	<u>Planning application ref.</u>	<u>Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)</u>	<u>Name and address of site</u>	<u>Greenfield/Brownfield</u>	<u>Site Area</u>	<u>Dwellings built to date</u>	<u>Residual completions expected by 2036</u>	<u>Total number of dwellings on site</u>	<u>No. residual expected to be completed in 5 years</u>	<u>2020/21 (Current)</u>	<u>2021/22 (Yr 1)</u>	<u>2022/23 (Yr 2)</u>	<u>2023/24 (Yr 3)</u>	<u>2024/25 (Yr 4)</u>	<u>2025/26 (Yr 5)</u>	<u>2026/27 (Yr 6)</u>	<u>2027/28 (Yr 7)</u>	<u>2028/29 (Yr 8)</u>	<u>2029/30 (Yr 9)</u>	<u>2030/31 (Yr 10)</u>	<u>2031/32 (Yr 11)</u>	<u>2032/33 (Yr 12)</u>	<u>2033/34 (Yr 13)</u>	<u>2034/35 (Yr 14)</u>	<u>2035/36 (Yr 15)</u>	<u>Total Identified Supply</u>
IP181	14/00638	Strategic Development Site (Outline approved)	Ipswich Garden Suburb Phase N1a (CBRE - West of Westerfield Road & south of Railway Line)	G	43.3	0	815	815	210	-	-	-	42	84	84	84	84	84	84	84	50	50	50	35	-	815
IP182 (part)	-	Strategic Development Site	Ipswich Garden Suburb Phase N3a (Mersea - East of Westerfield Road)	G	53.1	0	924	924	126	-	-	-	-	42	84	84	84	84	84	84	84	84	84	84	42	924
IP185, part IP182 & part IP180	-	Strategic Development Site	Ipswich Garden Suburb Phase N1b (Ipswich School), Phase N3b (Red House Farm) and Phase N2b (Other land)	G	25.6	0	456	456	0	-	-	-	-	-	-	-	-	-	-	-	72	96	96	96	96	456
ISPA 4.1	-	Allocation (ISPA4)	Humber Doucy Lane adjacent to Tuddenham Road	G	23.28	0	449	449	0	-	-	-	-	-	-	-	-	-	-	-	53	99	99	99	99	449
Various	Various	-	Sites with fewer than 5 dwellings	G	1.5	2	48	50	41	7	16	15	10	-	-	-	-	-	-	-	-	-	-	-	-	48
Various	Various	-	Sites with fewer than 5 dwellings	B	3.1	0	78	78	60	18	26	26	8	-	-	-	-	-	-	-	-	-	-	-	-	78
Windfall	-	-	Windfall sites	B	-	0	650	650	150	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	650
<b>Total</b>							<b>8,871</b>	<b>9,602</b>	<b>2,346</b>	<b>327</b>	<b>204</b>	<b>339</b>	<b>605</b>	<b>644</b>	<b>554</b>	<b>644</b>	<b>641</b>	<b>757</b>	<b>683</b>	<b>658</b>	<b>592</b>	<b>652</b>	<b>643</b>	<b>546</b>	<b>382</b>	<b>8,871</b>
Brownfield Total									1,431	308	172	282	413	338	226	369	344	441	395	337	250	240	264	183	145	4,707
Greenfield Total									915	19	32	57	192	306	328	275	297	316	288	321	342	412	379	363	237	4,164

\* In accordance with The Planning Practice Guidance (Paragraph 68-035-20190722) residential institutions in Use Class C2 can be included in the housing land supply based on the amount of accommodation released in the housing market. The Council has applied a ratio of 1 dwelling per 1.8 care home bedrooms, therefore for every 1.8 care home bedrooms 1 housing unit will be assumed.

## Appendix 6 – Amendments to Table 8A (MM137)

**TABLE 8A Major Infrastructure Proposals**

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Flood Management							
Ipswich Flood Defence Management Strategy  May include measures such as sheet piling renewal or a pumping station – to be confirmed by Environment Agency	Continued regeneration through mixed use developments within the Flood Risk zones in IP-One	Environment Agency	To be confirmed when the measures have been identified	tbc	tbc	Defra Environment Agency Developer contributions	2036
Early years							



Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Additional early years capacity to meet demand arising from development in Alexandra Ward</p> <p>New setting at IP048</p> <p><del>Expansion of existing settings and SCC investigate investigating</del>  <u>potential for new provision in town centre units and other options.</u>  <u>Listed cost is estimated cost of one 30 place and one 60 place setting.</u>  <u>30 places could be provided to Alexandra Ward through the 90 place setting on site IP037.</u></p>	Essential to support growth	Suffolk County Council	<p><del>£2,350,448</del></p> <p><del>£509,886</del></p> <p><del>£1,609,812</del></p> <p><del>£1,902,267</del></p>	<p><del>£2,176,821</del></p> <p><del>£509,886</del></p> <p><del>£1,609,812</del></p> <p><del>£1,902,267</del></p>	<p>Unknown</p> <p><u>£173,627.00</u></p>	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<u>New early years setting at ISPA4.1 (Humber Doucy Lane) – to be determined at Masterplanning stage</u>	<u>Essential to growth</u>	<u>Suffolk County Council</u>	<u>£958,980</u>	<u>£915,477.12 (IBC only, does not include contributions from East Suffolk Council)</u>	<u>£43,502.88</u>	<u>Developer Contributions</u>	<u>2031 onwards based on delivery of site ISPA4.1 in the housing trajectory.</u>

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Additional early years capacity to meet demand arising from development in Bridge Ward</p> <p>New setting at Halifax Primary School (preferred option if funding gap can be addressed)</p> <p>or</p> <p>Expansion of provision at Hillside Primary School</p>	Essential to support growth	Suffolk County Council	<p>£588,330</p> <p>or</p> <p>£414,900</p>	<p>£493,381</p> <p>or</p> <p>£414,900</p>	<p>£94,949</p> <p>or</p> <p>£0</p>	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Additional early years capacity to meet demand arising from development in Castle Hill, Whitehouse and Whitton Wards</p> <p>If possible, expand provision at Highfield Nursery and/or provide additional capacity at Ipswich Garden Suburb settings</p>	Essential to support growth	Suffolk County Council	£597,456 - £705,996	£597,456 - £705,996	£0	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period
<p>Additional early years capacity to meet demand arising from development in Gainsborough Ward</p> <p>Seek to expand provision at either Morland or Ravenswood Primary Schools</p>	Essential to support growth	Suffolk County Council	£149,364	£149,364	£0	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Additional early years capacity to meet demand arising from development in Gipping Ward  New setting on development site	Essential to support growth	Suffolk County Council	<u>£1,175,224</u> <del>£1,176,660</del>	<u>£1,612,136</u> <del>£1,000,161</del>	<u>£0</u> <del>£176,499</del>	Suffolk County Council  Developer contributions	Through-out plan period
Additional early years capacity to meet demand arising from development in Holywells Ward New <u>60 place</u> setting at Rosehill Primary School New <u>90 place</u> setting at IP037 subject to sequential and exception test	Essential to support growth	Suffolk County Council	<u>£2,431,764</u> <del>£2,353,320</del>	<u>£2,431,764</u> <del>£2,059,155</del>	<u>£0</u> <del>£294,165</del>	Suffolk County Council  Developer contributions	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Additional early years capacity to meet demand arising from development in St John's Ward</p> <p>Expand provision at Britannia Primary School, or</p> <p>Establish a new setting at St John's Primary School</p>	Essential to support growth	Suffolk County Council	<p>£331,920</p> <p>Or</p> <p>£588,330</p>	<p>£331,920</p> <p>Or</p> <p>£392,220</p>	Unknown	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period
Primary education							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Primary School Provision New school at IP048a Mint Quarter Extensions to existing schools: <ul style="list-style-type: none"> <li>• Rosehill Primary School</li> <li>• St Mark's or Sprites Primary School</li> <li>• <u>Cliff Lane Primary School</u></li> </ul>	Essential for the delivery of residential development across Ipswich including at the Waterfront	Suffolk County Council / Dept. for Education	£8,236,620  <u>£3,100,000</u> £1,742,580  £1,742,580 - £3,485,160  <u>£1,200,000</u>	£3,824,145 (based on 195 pupils)  <u>£ 1,211,423</u> £564,264  <u>£4,513,952</u> <u>£4,729,860</u>  <u>£3,065,537</u>	£4,415,175  <u>£1,888,577</u> £1,178,316  £0  <u>£0</u>	Suffolk County Council  Dept. for Education  Developer Contributions	Through-out plan period
Secondary education							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Secondary School expansion</p> <p><del>Chantry Academy – 300 places by 2036 (22% of demand is arising within Ipswich Borough)</del></p> <p>Stoke High School – 190 places by 2036 (48% of demand is from planned growth and remainder is background growth)</p>	Essential for the delivery of residential development across Ipswich including at the Waterfront and in Babergh Mid Suffolk District(s)	Suffolk County Council	£6,821,400	£2,046,420	£4,774,980	Suffolk County Council Dept. for Education Developer Contributions from Babergh Mid Suffolk and Ipswich	Through-out plan period
<u>Special Education Needs and Disability</u>							
<u>IP129 – Woodbridge Road – SEND School</u>	<u>Essential to support growth</u>	<u>Suffolk County Council</u>	<u>Fully Funded by Dept. For Education</u>	<u>£0</u>	<u>£0</u>	<u>Dept. for Education</u>	<u>Through-out plan period</u>



Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (S106)	Potential funding gap	Potential funding sources	Time-scale
Post-16 education							
Expansion of Suffolk One post-16 education in and around Ipswich <sup>3</sup>	Essential to support growth	Suffolk County Council	£9,095,200 <u>£4,065,525</u>	£7,799,134	£0	Suffolk County Council  Dept. for Education  Developer contributions including from neighbouring authorities	Through-out plan period
Waste provision							
Relocation of Portman's Walk Household Waste Recycling Centre (HWRC)  Expansion of Foxhall HWRC	Essential to support growth	Suffolk County Council	£3m  <u>£6m</u>	£110 per dwelling	£0	Suffolk County Council  Developer contributions	Through-out plan period
Libraries							

<sup>3</sup> It is not currently considered necessary to establish a new Sixth Form to serve Ipswich, but this will be reconsidered through the next plan review. If further capacity were required, the establishment of a new Sixth Form serving one or both of Ormiston Endeavour and the new Ipswich Garden Suburb secondary could be considered along with other options

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Expansion of existing libraries, remodelling of existing libraries or provision of flexible, digital access and/or mobile services.  Strategy and distribution of improvements to be developed during the plan period	Essential to support growth	Suffolk County Council	£700,000 <sup>4</sup>	£216 per dwelling	£0	Suffolk County Council  Developer contributions	Through-out plan period
Transport							
A14 Junction improvements Junction 55 Copdock Junction 56 Wherstead Junction 57 Nacton Junction 58 Seven Hills	Essential to support ISPA-wide growth	Suffolk County Council  Highways England	£65m-£100m £5m-£10m £5m-£10m £5m	Unknown	Unknown	Developer contributions (\$278/\$106) from all the ISPA authorities  Highways England (RIS or Minor Works Fund)  Central Government	Through-out plan period

<sup>4</sup> Approximately based on the number of dwellings from policy ISPA4 and SP2 housing allocations.

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Measures to increase capacity on A1214	Essential to support ISPA-wide growth	Suffolk County Council Highways England	£4m	Unknown	Unknown	Developer contributions from all the ISPA authorities	Through-out plan period
Sustainable transport measures in Ipswich, including Smarter Choices, Quality Bus Partnership and other measures as identified in ISPA Transport Mitigation Strategy and other relevant emerging strategies.	Essential to support ISPA-wide growth	Suffolk County Council	£7.3m-£8.4m to 2026	Tbc based on funding strategy through action plan	Tbc based on funding strategy through action plan	Developer contributions from all the ISPA authorities  Suffolk County Council  ISPA authorities	Through-out plan period
Infrastructure improvements to support sustainable transport measures and junction improvements	Essential to support ISPA-wide growth	Suffolk County Council	£16m-£20m to 2026	Tbc through action plan	Tbc through action plan	Developer contributions from all the ISPA authorities  Suffolk County Council	Through-out plan period
Link road through site IP029 via Europa Way from Bramford Road to Sproughton Road)	Desirable but not essential to support planned growth	Suffolk County Council	<del>Tbc</del> £700,000	<del>tbc</del> £0	<del>Tbc</del> £0	Suffolk County Council  New Anglia LEP  Developer contributions	<u>Anticipated Start of February 2021</u>

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (S106)	Potential funding gap	Potential funding sources	Time-scale
Wet Dock Crossing	Desirable but not essential to support planned growth	Suffolk County Council	Tbc	tbc	SCC has agreed up to £10.8m and funding gap will be difference between this and total cost.	Suffolk County Council Developer contributions	Through-out plan period
Green infrastructure							
Green infrastructure: - green trail around Ipswich - country park at Ipswich Garden Suburb (see Table 8B) Expansion of Orwell Country Park	Essential to support growth	Developers Suffolk County Council Ipswich Borough Council	tbc <u>IGS Country Park - £4,225,000 (excluding maintenance and SuDS)</u>	Tbc <u>IGS Country Park - £0 (Provided by Housing Infrastructure Fund)</u>	Tbc <u>IGS Country Park - £0</u>	Developer contributions and direct provision Housing Infrastructure Fund Ipswich Borough Council <u>Recreational Avoidance and Mitigation Strategy contributions</u>	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (S106)	Potential funding gap	Potential funding sources	Time-scale
						(Orwell Country Park)	
Utilities							
New primary substation at Turret Lane	Development in the town centre in support of urban regeneration	UK Power Networks	tbc	Tbc	tbc	UK Power Networks	Need and delivery still under investigation
Water supply - site connections to the existing network (may include network upgrades)  Foul sewerage network - site connections to the existing network (may include network upgrades)	Essential to support growth	Anglian Water Services Ltd	tbc	tbc	tbc	Anglian Water  Developer contributions	Throughout plan period
Sport & leisure facilities							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>New sports, leisure and recreation facilities – will be identified through IBC review of sports provision:</p> <p>Rights of Way Improvement Plan</p> <p>Ravenswood Sports Park IP150b</p> <p>Relocation of King George V Playing Fields IP032</p>	Supporting growth, enhancing health and quality of life, and supporting greener lifestyles and green transport	<p>Ipswich Borough Council</p> <p>Developers</p> <p>Highway Authority for Rights of Way Improvement Plan</p>	tbc	tbc	tbc	<p>Developer contributions</p> <p>Ipswich Borough Council</p> <p>Housing Infrastructure Fund</p> <p>Suffolk County Council</p>	Need and delivery still under investigation
Healthcare provision							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Health centre at IP005 Former Tooks Bakery  Healthcare provision enhancements – to be identified in conjunction with schemes coming forward	Essential to support growth	Ipswich & East Suffolk Clinical Commissioning Group  East Suffolk and North Essex NHS Foundation Trust	tbc	tbc	tbc	Dept. for Health NHS England  East Suffolk and North Essex NHS Foundation Trust  Ipswich & East Suffolk Clinical Commissioning Group  Developer contributions	Through-out plan period

**Appendix 7 – Amendments to Plan 5: Ipswich Ecological Network (MM161)**





## **Appendix 8 - The Ipswich Ecological Network updates to reflect the findings of the Ipswich Wildlife Audit (2019) (MM161)**

The existing ecological network has been updated as follows to reflect the findings of the Ipswich Wildlife Audit 2019. The list below explains how this has changed.

### **Site added to Potential Development site with wildlife interest Rank 1 – 4**

- IP035 Burtons Site, Key Street / Star Lane
- IP067a Former British Energy Site (north) – (not previously assessed)
- IP067b Former British Energy Site (south) – (not previously assessed)
- IP109 Jupiter Road/Reading Road
- IP141a(1) Land at Futura Park, Nacton Road (fronting Nacton Road)
- IP150a Areas U, V & W, south of Ravenswood
- IP184b Land opposite 367 to 383 Humber Doucy Lane (previously part of a wider site IP184 and not a potential development site)
- IP184c (part of ISPA4 allocation) Land opposite 341 to 365 Humber Doucy Lane (previously part of a wider site IP184 and not a potential development site)
- IP221 The Flying Horse PH, 4 Waterford Road
- IP302 Land opposite 193-251 Humber Doucy Lane
- IP309 68A Austin Street
- IP350 (part of ISPA4 allocation) West corner of Humber Doucy Lane/Tuddenham Road

### **Site added to Potential Development site with wildlife interest Rank 5 or below**

- IP011a Lower Orwell Street (formerly Smart Street/ Foundation Street)
- IP011b Smart Street / Foundation Street
- IP012 Peter's Ice Cream
- IP014 Hope Church
- IP015 West End Road Surface car park
- IP028a Island site adjacent to Jewsons, Greyfriars Road
- IP028b Jewsons, Greyfriars Road
- IP030a Humber Doucy Lane (opposite 97 to 123)
- IP030b Humber Doucy Lane (opposite 37 to 97)
- IP031(a & b) Burrell Road
- IP037 The Island Site
- IP039a Land between Gower Street & Great Whip Street
- IP040 Civic Centre Area / Civic Drive
- IP041 Former Police Station, Civic Drive
- IP042 Land between Cliff Quay and Landseer Road
- IP043 Commercial Buildings and Jewish Burial Ground, Star Lane
- IP045 Holywells Road East
- IP047 Commercial Road
- IP048a Mint Quarter / Cox Lane East
- IP048b Cox Lane West Regeneration Area
- IP054b Land between Old Cattle Market and Star Lane
- IP064a Land between Holywells Road and Holywells Park

- IP074 Church and land at Upper Orwell Street
- IP080 240 Wherstead Road
- IP089 Waterworks Street
- IP096 Car Park Handford Road
- IP098 Transco south of Patteson Road
- IP105 Depot, Beaconsfield Road
- IP119 Land east of West End Road
- IP120b Land west of West End Road
- IP131 Milton Street
- IP133 Land south of Felaw Street
- IP135 112-116 Bramford Road
- IP142 Land at Duke Street
- IP184a (part of ISPA4 allocation) Land opposite 383 to 447 Humber Doucy Lane (previously part of a wider site IP184 and not a potential development site)
- IP188 Webster's Saleyard Site, Dock Street
- IP200 Griffin Wharf, Bath Street
- IP279 Former British Telecom Office, Bibb Way
- IP280 Westerfield House, Humber Doucy Lane
- IP283 Grimwade Street, Student Union Club and adjacent car park, Rope Walk
- IP303 (part of ISPA4 Allocation) East corner Humber Doucy Lane/Tuddenham Road
- IP307 Prince of Wales Drive
- IP344 (part of ISPA4 Allocation) Land north of 447 and fronting Humber Doucy Lane
- IP346 Suffolk Retail Park
- IP356 79 Hutland Road/Sidegate Lane

#### Potential development site updated from 2012 Wildlife Audit report

- IP003 Waste tip and employment area north of Sir Alf Ramsey Way - site boundary amended, rank unchanged
- IP010 Felixstowe Road - site split to form IP010a and IP010b, rank unchanged
- IP029 Land Opposite 674-734 Bramford Road - rank updated to 3+ Medium (was 4 Medium)
- IP061 School Site, Lavenham Road – site boundary amended, rank unchanged
- IP066 JJ Wilson, White Elm Street - site boundary extended, rank updated 6 Low (was 5 Low)
- IP143 Former Norsk Hydro site, Sandy Lane - potential development area of site boundary amended, rank updated to 4 Medium (was 3 Medium)
- IP150b Land south of Ravenswood west (Sports Park) - site divided to form a revised IP150b and new IP150d, rank updated to 3+ Medium (was 3 Medium)
- IP150c - Land south of Ravenswood east (fronting Nacton Road) – site divided to form a revised IP150c and new site IP150e, rank updated to 3+ Medium (was 3 Medium)

#### Site developed – incorporating wildlife buffer

- IP005 Former Tooks Bakery, Old Norwich Road
- IP090 (part) Europa Way (area of new care home removed)
- IP116a & b Former St Clement's Hospital Grounds

- IP141a(3) Land at Futura Park, Nacton Road (employment site behind Waitrose) - this area was surveyed for the Wildlife Audit update in 2019 but has since been developed
- IP146 (part) Ransomes Europark (developed areas at Lytham Road and Berwick Road removed)
- IP165 Eastway Business Park, Europa Way
- UC264 (site 151) Land between railway junction and Hadleigh Road
- W62 (site 87) Rear of 346 Felixstowe Road (Garrods Pond)

#### Explanation of Site Rankings Taken From the 2019 SWT Wildlife Audit<sup>5</sup>

Site Ranking 1 (High Conservation Value): Sites of Special Scientific Interest (SSSIs): the most important sites for wildlife within a national context. The criteria used to assess such sites have been developed by English Nature (now Natural England).

Site Ranking 2 (High Conservation Values): County Wildlife Sites (CWSs): these sites have a high priority for protection. Although there is currently no statutory protection, all of Suffolk's local authorities have included a policy in their local plans to protect CWSs from development. The criteria used to assess CWSs have been developed by Suffolk Wildlife Trust, Suffolk County Council, Natural England and Suffolk Biological Records Centre (SBRC) (The County Wildlife Site panel). The information is available on the Suffolk Biodiversity Information Service (SBIS) website: <http://www.suffolkbis.org.uk/suffolk-sites/cws>.

Site Ranking 3 (Medium Conservation Value): Sites which do not fulfil the criteria for SSSI or CWS status but have a high conservation value: In some districts, these are designated as 'Local Wildlife Sites' when they are situated within urban areas. These sites comprise the best examples of different habitats or are important for a particular species and are assessed of the following criteria:

- Non-recreatability;
- Diversity and presence of indicator species;
- Rarity;
- Potential value;
- Size;
- Woodland;
- Scrub;
- Grassland;
- Created habitats; and
- Species.

Site Ranking 4 (Medium Conservation Value): Other Sites of Nature Conservation Interest: sites which are less important for wildlife but still retain a degree of naturalness. Locally common Priority species such as song thrush may be present and also locally common protected species such as reptiles.

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<sup>5</sup> See Section 3.2 of the Ipswich Wildlife Audit 2019 (CDL Ref. D21).

Site Ranking 5 (Low Conservation Value): Areas that have limited value for wildlife: These may include arable fields or regularly mown amenity grassland with some features of wildlife value, such as some boundary hedgerows or rough grass margins. In a highly built up area this could also include individual mature trees.

Site Ranking 6 (Low Conservation Value): Areas that have no or very limited value for wildlife: These may include built areas, large arable fields, other disturbed ground or regularly mown amenity grassland with no other semi-natural features.