

**Statement of Common Ground between
Ipswich Borough Council as Local Planning Authority**

and

Suffolk County Council

29 September 2020

Scope

1. This Statement of Common Ground identifies areas of agreement and seeks to find a way forward on areas of potential disagreement between Suffolk County Council (SCC) and Ipswich Borough Council (IBC) in relation to the SCC representations to the Final Draft Ipswich Local Plan.

Objective

2. The objective of this Statement of Common Ground is to secure agreement between the parties to ensure a satisfactory position regarding the following matters in relation to the Final Draft Ipswich Local Plan:
 - Table 8A – Major Infrastructure Proposals;
 - Site Specific Early Years and Primary Education Provision;
 - Cross-Boundary Development (Policy ISPA4);
 - Flooding and Water Management;
 - Archaeology; and
 - Minerals and Waste.
3. The establishment of a satisfactory position will enable the submission of the Final Draft Ipswich Local Plan to the Secretary of State for examination.
4. IBC have worked with SCC at each stage of preparation of the emerging Local Plan Review to formulate the identified infrastructure needs over the Local Plan period. This includes discussions around the matters of early, primary and secondary education, libraries, waste and recycling, and, transport infrastructure.
5. As statutory consultees, SCC have been formally consulted at every stage of consultation of the emerging Local Plan Review and have provided constructive comments to IBC throughout the process. IBC have responded to comments raised by SCC at the relevant stages of the emerging Local Plan Review.
6. SCC is involved in the planning system as a statutory consultee, infrastructure provider and as the planning authority for minerals, waste and development to carry out its own functions. SCC has input into the local plan process providing background information, policy recommendations and infrastructure requirements in relation to the following areas:
 - Archaeology
 - Education
 - Fire and Rescue

- Flooding and Water Management
- Libraries
- Minerals and Waste
- Natural Environment
- Public Rights of Way
- Highways and Transport

Notes

7. The matters of transport and parking have been addressed by way of a separate Statement of Common Ground.
8. Insertions are shown underlined and deletions are shown in ~~striketrough~~.

Table 8A – Major Infrastructure Proposals

9. SCC have raised concerns regarding the soundness of the major infrastructure proposals table in the Final Draft Local Plan Review. Supporting representation are not included in this Statement of Common Ground.

Table 1 SCC Objections and areas of common ground and potential amendments to Table 8A – Major Infrastructure Proposals of the emerging Local Plan Review, Regulation 19

Representation ID	Table Section/ Row	Representation	Specific Amendment(s) Requested	Areas of Agreement	Areas of Disagreement (including reasons if applicable)
26573	General	This part of the plan is not sound because it is not in line with national policy. NPPF paragraph 34 explains that plans should set out the contributions expected from development and this part of the plan needs updating to meet this requirement. The County Council will work with the Borough in reviewing the wording and costs in the table and will agree matters through a Statement of Common Ground.	See relevant rows below and Appendix 1 for full details of proposed amendments.	IBC agrees with SCC that this part of the plan needs updating to accord with Paragraph 34 of the NPPF and that a Statement of Common Ground is the appropriate mechanism to agree any reviews in wording and costs in Table 8A. An amended version of Table 8A is provided in Appendix 1 of this document and IBC agrees to these changes.	
26573	Early Years Education	This part of the plan is not sound as it is not effective. In setting out the strategy to	Insert “ <i>IP279 – Bibb Way</i> ” as the site for early years provision in the Gipping Ward.	IBC and SCC will continue to negotiate and discussions are ongoing with SCC regarding the delivery of a early years setting on	

		<p>address early years demand caused by growth in the Gipping Ward, the table states that a new setting (such as a day nursery) on a development site is required, however the specific site has not been stated. In order to provide certainty that development in the Gipping Ward can mitigate its impact, the site should be specified in the plan. Options considered throughout the plan making process have been sites IP003, IP051 and IP279. IP003 and IP051 are both within flood zone 3, while IP279 is largely outside flood zones 2 and 3. Taking a sequential approach to more vulnerable uses, IP279 would be the County Council's preferred choice for a setting. The site sheet</p>		<p>one of the sites in the Gipping ward or in one of the adjacent wards provided any site is sustainably accessible. The LPA will continue to discuss the feasibility of an early years setting at appropriate sites within the ward or adjacent wards.</p>	
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		and entry in Table 1 of the Site Allocation Policies document should also be updated in line with this amendment.			
26573	Primary Education	In addition to the expansion of Rose Hill Primary, St Mark's and Sprites Primary schools, there will be a requirement to expand Cliff Lane Primary School. However, depending on the precise number of pupils, either St Mark's or Sprites Primary schools or both would need to expand. To make this part of the plan sound, Cliff Lane Primary should be added to Table 8a.	Insert " <u>Cliff Lane Primary School</u> " into the list of primary schools to be expanded and include details of costs (see Appendix 1 for full details)	IBC agrees to this amendment. See Appendix 1 for full details of this amendment.	N/A
26573	Secondary Education	The County Council has reassessed the secondary school needs arising from the local plan with updated pupil forecasts (January 2020), which has	Delete " Chantry High School " from list. Delete specific details of Stoke High School expansion. Update costs accordingly (see Appendix 1 for full details)	IBC agrees to these amendments. See Appendix 1 for full details of these amendments.	N/A

		<p>resulted in a change of strategy. Table 8a currently states that both Stoke High School and Chantry Academy need to be expanded. In previously assessing the need for secondary school places, SCC used the school pyramids to identify where pupils from development would attend school. However, Ipswich is unusual in Suffolk in that the school pyramid areas and the secondary school catchment areas are different from one another. On reflection, the County Council considers it is more appropriate to base the secondary school strategy on the school catchments. Depending on the rate of delivery within Ipswich Garden Suburb, this results in</p>			
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		only Stoke High School needing to expand.			
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Site Specific Early Years and Primary Education Provision

10. SCC have submitted the following objections to the Final Draft Ipswich Local Plan Review regarding the delivery of early years and primary education on specific sites. Supporting representation are not included in this Statement of Common Ground.

Table 2 SCC Objections and areas of common ground and potential amendments regarding site specific early years and primary education provision of the emerging Local Plan Review, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement (IBC suggested modification(s))	Areas of Disagreement (reasons if applicable)
26598	Site Allocations DPD – Site Sheet IPO48a (Mint Quarter East)	This part of the plan is not sound because it is not effective. Included among the uses of this site should be an early years setting to accompany the new primary school. The 60 place early years setting, which is necessary on this site to mitigate impacts of plan growth, is accounted for in Table 8a of the Core Strategy document. However, this should also be included on the site sheet in order to provide certainty in delivering an early years setting on this site.	<p><u>Site Sheet IP048a:</u> Amend table of uses, specifically the primary uses as follows: <i>“Primary School</i></p> <p><i>Early years setting</i></p> <p><i>Amenity green space & short stay multi-storey car parking 40%”</i></p>	IBC agrees with the proposed modification as recommended.	N/A

26600	Site Allocations DPD – Policy SP2 – Table 1	This part of the plan is not sound because it is not effective. The entry for site IP048a and IP037 on this table should include an early years setting, to provide certainty in delivering an early years setting on this site, in order to mitigate the impacts of growth on the provision of early education.	<p><u>Table 1:</u> Amend description column for IP037 as follows: <i>“Allocated for housing, <u>early years education</u> and open space alongside existing Marina and small commercial uses to support enterprise zone...”</i></p> <p>Amend description column for IP048a as follows: <i>“Primary school, <u>including early years setting</u>, and car parking development to the north of Upper Barclay Street...”</i></p>	IBC agrees with the proposed modifications to the IP037 and IP048a descriptions in table 1.	N/A
26595	Site Allocations DPD – Site Sheet IP010a (Co-Op Depot, Felixstowe Road)	This part of the plan is not effective. The County Council welcome that the need to expand the school has been recognised within the plan, however feasibility work which has been undertaken since the preferred options consultation of the plan show that	<u>Site Sheet IP010a:</u> Amend table of uses, specifically the secondary use (school extension) indicative capacity: <i>“0.5ha <u>0.8ha</u>”</i>		<u>Ipswich Borough Council</u> The percentages and site areas dedicated to the two uses of residential and education are identified as indicative. The amount of land required for each use will be subject to separate landowner discussions between the relevant parties and may be subject to change depending on these negotiations.

		<p>the area of land needed to expand the school is 0.8ha.</p>			<p><u>Suffolk County Council</u> <u>It is the county council's view that the land required for development should be stated within the plan.</u> <u>Paragraph 94 of the NPPF states that plans should give great weight to the need to expand schools and that key issues should be resolved before a planning application is submitted.</u> <u>The land area dedicated to educational use is a key issue for expanding the school and identifying an area lower than evidence identifies is needed sets the wrong expectation for developers and could cause issues at the planning application stage. It also introduces the risk that the school will not receive the appropriate land area to expand and meet the educational needs generated by development.</u></p>
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Policy ISPA4 (Cross-Boundary Working to Deliver Sites)

11. SCC have raised the following objection to Policy ISPA4 (Cross-Boundary Working to Deliver Sites) of the Final Draft Ipswich Local Plan Review. Supporting representation are not included in this Statement of Common Ground.

Table 3 SCC Objection and areas of common ground and potential amendments regarding Policy ISPA4 of the emerging Local Plan Review, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement (IBC suggested modification(s))	Areas of Disagreement (reasons if applicable)
26579	Core Strategy and Policies DPD – Policy ISPA4	The County Council welcomes the policy commitment to coordinate development across boundaries. It is noted that this area is outside of any of the buffers district or local centres defined on Plan 1. NPPF paragraph 92 states that planning policies and decision should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” Paragraph 103 states that the planning system should limit the need to travel,	<u>Policy:</u> <u>Insert criterion e:</u> <u>“e. A local centre”</u>	IBC disagrees with the insertion of this wording into the policy. The reason for this is because the wording of this policy has been purposefully collaborated with East Suffolk Council to align with the equivalent policy (SCLP12.24) requirements in the emerging Suffolk Coastal Local Plan. The emerging Suffolk Coastal Local Plan is currently out for main modifications consultation and no such wording regarding a local centre has been included for this policy. IBC therefore considers it would be inconsistent to include this wording now. Notwithstanding this, IBC agrees with the merits of creating an appropriate mix	

		<p>through an appropriate mix of uses.</p> <p>In order to enable access to services and make future communities in the area defined by ISPA4 sustainable the policy should state the master planning of the site should also consider the inclusion of a local centre.</p> <p>This will also help to keep the plan more internally consistent as paragraph 6.17 states that where possible development should be located so that residents can access existing local or district centres. As this is a large development, outside of local or district centre buffers, the potential scope for a new local centre appears to be an aspect that should be investigated through master planning.</p>		<p>of uses which is advocated in policy CS2 of the emerging Local Plan Review. Given the established infrastructure requirements of the proposed site allocation, coupled with the relatively modest approximate dwelling capacity of the allocation, it is considered that there may be scope for a degree of convenience retail to help meet the everyday needs of future occupiers. Therefore, IBC proposes as an alternative that paragraph 8.24 of the reasoned justification for Policy ISPA4 is amended as follows:</p> <p>“...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</p>	
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				green infrastructure. As part of the master plan work, mitigation measures required that arise from demand created by the development will be reconsidered, including possibly the need for <u>convenience retail</u> healthcare facilities.	
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Flooding and Water Management

12. SCC have raised the following objections in relation to flooding and water management matters of the Final Draft Ipswich Local Plan Review. Supporting representation are not included in this Statement of Common Ground.

Table 4 SCC Objections and areas of common ground and potential amendments regarding Flooding and Water Management matters of the emerging Local Plan Review, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement (IBC suggested modification(s))	Areas of Disagreement (reasons if applicable)
26593	Strategic Flood Risk Assessment	The County Council has been working with the Borough Council and its consultants in preparing the Strategic Flood Risk Assessment (SFRA) and this collaborative working is appreciated. The SFRA is still currently in draft form and needs further work arising from data to be provided by the Environment Agency. The County Council, as the Lead Local Flood Authority, will assist the Borough in further developing this important piece of evidence, ensuring plan policies are	N/A	IBC agrees with the general position that in order to ensure the plan is effective and consistent with national policy, subsequent changes to the plan may be required on completion of the SFRA. Since these SCC comments were raised (March 2020), IBC has continued to engage with SCC and the Environment Agency on finalising the SFRA. A final version was agreed for publication in May 2020. The findings and recommendations of the final version of the SFRA mirror the draft SFRA. The final version is not considered to result in any material changes to be necessary to the Final Draft Local Plan. The final version	

		<p>appropriately justified. Changes will be subject to ongoing work, however, in broad terms, the SFRA would benefit from setting out how development needs to respond to local circumstances and then the policies and site sheets to incorporate the overall results. Some of this information will likely be able to be transferred from the previous SFRA, as well as more location specific advice. In order to ensure the plan is effective and consistent with national policy, subsequent changes to the plan may be required on completion of the SFRA.</p>		<p>has been subject to assessment under both the Sustainability Appraisal and Habitat Regulations Assessment. The data expected from the Environment Agency has yet to be provided and subsequently the SFRA has been based on the most up to date and best available evidence at the time of the submission of the Local Plan Review for examination. As part of the Final SFRA, all of the allocations and significant alternatives through the SHELAA have been individually assessed. Although the SFRA has been completed we are waiting for the final Gipping Model to be released from the Environment Agency. However, we have had meetings with the EA and discussed initial findings. These have been put to the consultants.</p> <p>We have attached a copy of the Statement of Common Ground which has been</p>	
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				agreed with the EA, which covers an agreed approach to deal with the Gipping Model when this appears.	
26593	Core Strategy and Policies DPD – Policy DM4 (Development and Flood Risk)	Policy DM4 is not sound because it is not consistent with national policy. NPPF paragraph 165 states “Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.” Part a) of this policy states development will be approved where: “it does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development and wherever practicable appropriate application of Sustainable Drainage Systems (SuDS)”	<p><u>Policy</u> Criterion A): <i>“it does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development and wherever practicable appropriate application of Sustainable Drainage Systems (SuDS);”</i></p> <p>Criterion F): <i>“it includes water efficiency measures such as water re-use, stormwater or rainwater harvesting, or use of local land drainage water where practicable; and</i> “</p> <p><u>Reasoned Justification:</u> 9.4.5; <i>“SuDS are an important method of reducing flood risk associated with development and are an essential element of any development in the Borough wherever practicable...”</i></p> <p>9.4.6; <i>“...It is also important</i></p>	IBC agrees with the modifications as proposed.	N/A

		<p>Planning practice guidance paragraphs 082 and 083 uses the term “practicable” in reference deciding the most appropriate type, operation and maintenance of SUDS on a site, rather than the principle of whether SUDS should be used on a site. The guidance makes a distinction between the terms “inappropriate” and “practicable”. As such, the current wording of the policy is not consistent and could cause confusion. The words “where practicable” should be removed from the policy.</p>	<p><i>that there is existing sewage treatment capacity and foul drainage exists or that it is capable of being included in time to serve standards where practicable...”</i></p>		
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Archaeology

13. SCC have raised the following objections in relation to archaeological matters of the Final Draft Ipswich Local Plan Review. Supporting representation are not included in this Statement of Common Ground.

Table 5 SCC Objections and areas of common ground and potential amendments regarding archaeological matters of the emerging Local Plan Review, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement (IBC suggested modification(s))	Areas of Disagreement (reasons if applicable)
26604	Site Allocations DPD – Appendix 4 (Opportunity Sites) – IP028b (Jewsons)	This part of the plan is not sound because it is not effective. The text states this site refers to Archaeological Character Zone 2, but the site lies within Archaeological Character Zone 1b, for the Historic Core, and is therefore of a higher sensitivity than indicated on the site sheet. This text should be corrected to ensure that heritage assets are appropriately identified and approached by development.	<i>The site lies on the edge of the River Gipping, within the likely former extent of the precinct of the medieval Franciscan friary (Greyfriars). There is potential for archaeological remains relating to the friary to survive on the site, as well as earlier occupation on the edge of lower lying marshy land. Within the western part of the site, marsh deposits have been identified, but human remains were recorded during construction of the eastern side of the existing buildings on the site. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of</i>	Agree with modifications as proposed.	N/A

			<p>work). This site likely lies in the former extent of the town marsh. Palaeo-environmental assessment and mitigation for impacts on deeper deposits may be required. Deep excavations may encounter waterlogged features. Stratigraphy may be expected to be particularly deep in former streams and watercourses and waterlogged features are recorded in the Urban Archaeological Database.</p>		
26609	<p>Site Allocations DPD – Site Sheets – IP011c (Smart Street/ Foundation Street)</p>	<p>While not strictly related to soundness, information on some site sheets could be updated to provide helpful information or improve the accuracy of the information. The separation of IP011 into b and c means some further clarification is required. Amend to:</p>	<p>'The site lies... close to the grade II* St Mary at Quay Church, contains two scheduled monuments and lies within an area of archaeological importance.'</p> <p>"There is also limited potential for nationally important archaeological remains outside of the scheduled and previously scheduled areas. This is because much of the site has already been excavated in the past. Detailed early Pre-application discussion with Suffolk County Council Archaeological Service is advised. and Historic England would be required to agree the scope of required assessment,</p>	<p>IBC agrees with the majority of the amendments proposed. The only exception is the final sentence of the second paragraph. Whilst IBC acknowledges that the "agreement of the scope of the required assessment" is not necessary as there are no Scheduled Monuments on this site, IBC maintains that Historic England are recommended to be engaged at the pre-application stage due to the presence of the nearby heritage assets. Therefore, IBC instead proposes:</p>	N/A

			<i>the principle of development and to inform design.”</i>	<i>“Detailed early Pre-application discussions with Suffolk County Council Archaeological Service and Historic England is advised. and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design.”</i>	
26612	Site Allocations DPD – Site Sheets – IP354 (72 Old Boatyard, Cullingham Road)	While not strictly related to soundness, information on some site sheets could be updated to provide helpful information or improve the accuracy of the information. Insert the following into the site sheet:	<i>“The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.”</i>	Agree with modification as proposed.	N/A
26615	Site Allocations DPD – Site Sheets – IP355 (77 - 79 Cullingham Road)	While not strictly related to soundness, information on some site sheets could be updated to provide helpful information or improve the accuracy of the information.	<i>“The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through</i>	Agree with modification as proposed.	N/A

		Insert the following into the site sheet:	<i><u>conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.</u></i>		
26616	Site Allocations DPD – Site Sheets – ISPA4.1 (Land at Humber Doucy Lane)	While not strictly related to soundness, information on some site sheets could be updated to provide helpful information or improve the accuracy of the information. Insert the following into the site sheet:	<i><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, geophysical survey and an appropriate level of trial trenched archaeological evaluation (see character zone 2c in Archaeology and Development SPD).”</u></i>	Agree with modification as proposed.	N/A
26618	Site Allocations DPD – Site Sheets – IP089 (Waterworks Street)	Grammar error in site sheet.	<i><u>“This site is a large area in on the edge of the Anglo-Saxon and Medieval core and within the Area of Archaeological Importance (IPS 413).”</u></i>	Agree with modification as proposed.	N/A

Minerals and Waste Plan

14. At the Preferred Options (Regulation 18) stage of consultation, SCC requested additional wording to some of the site sheets to highlight nearby minerals safeguarding sites and waste sites where appropriate. These were unintentionally omitted as amendments for the Final Draft (Regulation 19) stage and both parties agree that instead they should be agreed as part of this SoCG.

Table 6 SCC areas of common ground and potential amendments regarding minerals and waste matters of the emerging Local Plan Review, Regulation 18

<u>Site Reference</u>	<u>Additional Wording Agreed</u>
<u>IP003</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the Suffolk Minerals and Waste Local Plan (SMWLP). It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP004</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP031a</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the Suffolk Minerals and Waste Local Plan SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP031b</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP037</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP039a</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP067b</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>

<u>IP119</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP120b</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP133</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP188</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP279a, b(1) and b(2)</u>	<u>The site allocation is within 250m of a safeguarded waste use site in the SMWLP. It should be demonstrated, in consultation with Suffolk County Council, that the development of the site allocation does not prevent the waste facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facility.</u>
<u>IP003</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP004</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP037</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP045</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP067b</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP080</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>

<u>IP119</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP120b</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP279</u>	<u>The site allocation is within 250m of a safeguarded mineral site in the SMWLP. At the planning application stage the developer of these sites should demonstrate that the development does not prevent the mineral facility from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby minerals facility.</u>
<u>IP116</u>	<u>The site allocation is over 5ha and falls within the Minerals Consultation Area. Therefore Minerals Policy MP10 of the SMWLP applies. The use of minerals on site may be required by Suffolk County Council.</u>
<u>IP140</u>	<u>The site allocation is over 5ha and falls within the Minerals Consultation Area. Therefore Minerals Policy MP10 of the SMWLP applies. The use of minerals on site may be required by Suffolk County Council.</u>
<u>IP141a</u>	<u>The site allocation is over 5ha and falls within the Minerals Consultation Area. Therefore Minerals Policy MP10 of the SMWLP applies. The use of minerals on site may be required by Suffolk County Council.</u>
<u>IP147</u>	<u>The site allocation is over 5ha and falls within the Minerals Consultation Area. Therefore Minerals Policy MP10 of the SMWLP applies. The use of minerals on site may be required by Suffolk County Council.</u>
<u>IP149</u>	<u>The site allocation is over 5ha and falls within the Minerals Consultation Area. Therefore Minerals Policy MP10 of the SMWLP applies. The use of minerals on site may be required by Suffolk County Council.</u>
<u>IP150b</u>	<u>The site allocation is over 5ha and falls within the Minerals Consultation Area. Therefore Minerals Policy MP10 of the SMWLP applies. The use of minerals on site may be required by Suffolk County Council.</u>
<u>IP152</u>	<u>The site allocation is over 5ha and falls within the Minerals Consultation Area. Therefore Minerals Policy MP10 of the SMWLP applies. The use of minerals on site may be required by Suffolk County Council.</u>

Signatures

Signed: 

Name: Martyn Fulcher

Position: Head of Development

Date: 29 September 2020

Ipswich Borough Council

Signed: 

Name: James Cutting

Position: Head of Planning

Date: 29 September 2020

Suffolk County Council

Appendix 1 – Table 8A with proposed amendments

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 (S106)	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>Expansion of existing settings and SCC investigate investigating potential for new provision in town centre units and other options. <u>Listed cost is estimated cost of one 30 place and one 60 place setting. 30 places could be provided to Alexandra Ward through the 90 place setting on site IP037.</u></p> <p><u>New early years setting at ISPA4.1 (Humber Doucy Lane) – Determined at Masterplanning</u></p>	Essential to support growth	Suffolk County Council	<p><u>£2,350,448</u></p> <p>£509,886</p> <p>£1,609,812</p> <p>£1,902,267</p>	<p><u>£2,176,821</u></p> <p>£509,886</p> <p>£1,609,812</p> <p>£1,902,267</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
<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 (S106)	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 (S106)	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> £1,176,660	<u>£1,612,136</u> £1,000,164	<u>£0</u> £176,499	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> £2,353,320	<u>£2,431,764</u> £2,059,155	<u>£0</u> £294,165	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 (S106)	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 (S106)	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"> • Rosehill Primary School • St Mark's or Sprites Primary School • <u>Cliff Lane Primary School</u> 	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> £4,729,860 <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 (S106)	Potential funding gap	Potential funding sources	Time-scale
<p>Secondary School expansion</p> <p>Chantry Academy – 300 places by 2036 (22% of demand is arising within Ipswich Borough)</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
Special Education Needs and Disability							
<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>	Through-out plan period
Post-16 education							

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
Expansion of Suffolk One-post-16 education in and around Ipswich ¹	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 <u>neighbouring authorities</u>	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							

¹ 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 (S106)	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 ²	£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 (S278/S106) from all the ISPA authorities Highways England (RIS or Minor Works Fund) Central Government	Through-out plan period

² 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	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	Tbc £700,000	tbc £0	Tbc £0	Suffolk County Council <u>New Anglia LEP</u> 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 (£106)	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 <u>funding gap will be difference between this and total cost.</u>	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 IGS Country Park - £4,225,000 (excluding maintenance and SuDS)	Tbc IGS Country Park - £0 (Provided by Housing Infrastructure Fund)	Tbc IGS Country Park - £0	Developer contributions and direct provision Housing Infrastructure Fund Ipswich Borough Council Recreational Avoidance and Mitigation Strategy contributions	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>	<p>Supporting growth, enhancing health and quality of life, and supporting greener lifestyles and green transport</p>	<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>	<p>Need and delivery still under investigation</p>
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