

Ipswich Borough Council Local Plan Review

Topic Paper: Retail and Town Centre – Including Post Submission (Regulation 22) Addendum August 2020

Evidence on the scale of retail development for Ipswich Borough and the approach to retail and town centre policies

January 2019 (regulation 18 stage preferred options consultation)



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Introduction

What the Council is doing

1. The Council is currently preparing a review of its adopted Core Strategy and Policies development plan document (DPD) (February 2017) and Site Allocations and Policies DPD (February 2017). These documents form the Council's Local Plan, which guides future development in the Borough.
2. Draft preferred options versions of the two plans are due to be published for informal public consultation between 16th January – 13th March 2019, under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
3. The Core Strategy and Policies DPD review (hereinafter referred to as the Core Strategy review) will replace the adopted Core Strategy and Policies DPD review when adopted (anticipated in late 2020).
4. The Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD review (hereinafter referred to as the Site Allocations Plan) will replace the adopted Site Allocations Plan when adopted (anticipated in late 2020).
5. The Council is undertaking a public consultation on the Core Strategy review, the Site Allocations Plan and their supporting sustainability appraisal and appropriate assessment reports. The consultation period will run from Wednesday 16th January to Wednesday 13th March 2019 and further details can be found on the Council's website, www.ipswich.gov.uk/consultations, at the Council's offices at Grafton House and the Customer Services Centre at the Town Hall, or in the County Library on Northgate Street.

National Planning Policy Framework – Plan Making

6. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF was revised in July 2018, implementing reforms announced previously through the Housing White Paper, the 'Planning for the Right Homes in the Right Places' consultation and the draft revised NPPF consultation. The NPPF is national planning policy and Local Plan documents such as the Core Strategy must refer to the principles established in the document.
7. The NPPF states in paragraph 35 that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are deemed to be sound if they are; positively prepared, justified, effective and consistent with national policy.
8. The Duty to Cooperate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty on local planning authorities to cooperate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. Paragraph 25 of the NPPF requires strategic policy-making authorities to collaborate and identify the relevant strategic matters which they need to address in their plans.

Ongoing joint-working is seen as critical to the production of positively prepared and justified strategies and helps to determine where additional infrastructure is necessary, and whether development needs that can't be met wholly within a particular plan area could be met elsewhere. To demonstrate this, paragraph 27 of the NPPF states that strategic policy-making authorities should prepare and maintain statements of common ground to document the cross-boundary matters being addressed and progress in cooperating to address these.

9. The NPPF makes clear that plans should apply a presumption in favour of sustainable development, meaning that plans should positively seek opportunities to meet their development needs, be flexible to adapt to rapid change and provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The exceptions to this are if assets or areas of particular importance provide a strong reasons for restricting development or any adverse impacts of doing so would significant and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

National Policy Context

10. Paragraphs 85 to 90 of the NPPF set the overarching strategy for planning for retail and town centres. It states that planning policies should support the role that town centres can play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
11. Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability. To do this, it is recommended that methods of diversification are explored to allow town centres to respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing). Existing markets should be retained and enhanced and primary shopping areas should be defined as part of a positive strategy for the future of each centre.
12. It requires plans to look ahead at least ten years when allocating a range of suitable town centre sites for retail, leisure, office and other main town centre uses. The NPPF has a sequential test approach to the location of town-centre uses, recommending town-centres first, then edge-of-centre sites, with out-of-centre sites only considered where there are no suitable available town-centre or edge-of-centre locations. When considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites which are well connected to the town centre.
13. Applications for retail and leisure development outside town centres that are not in accordance with an up-to-date plan will require an impact assessment if the development is over a locally set threshold. This will need to assess the impact of the proposal on existing, committed and planned public and private investments in centres within the catchment area, as well as the impact of the proposal on the town centre vitality and viability.
14. Applications that fail to satisfy the sequential test or are likely to have significant adverse impacts on one or more of the above considerations should be refused.
15. The NPPF defines main town centre uses as follows:
 - Retail development (including warehouse clubs and factory outlet centres);
 - Leisure;

- Entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls);
- Offices; and
- Arts, culture and tourism development (including theatres, museums, galleries, or a combination of the two)

Use Classes Order

16. The retail and town centre policies in the adopted and proposed plans refer in many places to uses as defined by the Use Classes Order (see Appendix 1). This is established through the Town and Country Planning (Use Classes) Order 1987 and subsequent amendments. Further information is available via the Planning Portal at <http://www.planningportal.gov.uk/permission/commonprojects/changeofuse/>.

17. In 2013 the Government introduced an amendment to the Use Classes Order to allow change of use from retail to offices (up to 150 sqm), plus a range of other uses for a temporary period of up to two years. In 2014 further amendments were made to allow change of use from a small shop (up to 150sqm gross of retail space) or provider of professional/financial services (A1 and A2 uses) to residential use (C3).

Government Consultation

18. In October 2018 the Government announced a consultation on planning reform titled 'Supporting the high street and increasing the delivery of new homes'. The key changes proposed in this consultation which relate to the town centre consisted of proposed revisions to permitted development (PD) rights:

- Amending PD rights to allow for upward extensions to existing commercial and residential buildings in town-centres and high streets to boost housing density;
- New PD rights allowing shops (A1), financial and professional services (A2), hot food takeaways (A5), betting shops, payday loan shops and launderettes to convert to office use by way of prior approval notices;
- New rights for a variety of premises to change use for up to three years without planning permission; and
- Inclusion of a new use class for mixed schemes of A1, A2 and A3 to switch between uses without being classed as development.

19. This consultation ran from 29 October 2018 to 14 January 2019 and the results and implications of this consultation have not been published as of yet.

Retail and Town Centre Studies

20. The following studies have informed and provide evidence in relation to the Council's current and proposed retail planning policies. These are discussed and referred to later in this Topic Paper in relation to specific elements of policy.

Retail and Commercial Leisure Study (Strategic Perspectives, October 2010)

21. The purpose of this study was to assess the quantitative and qualitative need for new retail and commercial leisure uses and floorspace, determine current shopping patterns for convenience and comparison goods and for main commercial leisure uses, carry out a health check of Ipswich town centre, advise on the network and hierarchy of centres

including any deficiencies and undertake a broad review of the role and function of district and local centres and the retail/leisure uses in the waterfront area. This study represented an updating of the 2005 Study.

22. This study set a target of 13,320 sq.m net comparison goods floorspace to be delivered from 2010 to 2016. Monitoring data taken from this period show that approximately 16,819 sq.m net floorspace was delivered. However, 13,202 sq.m of this was at Futura Park in an out of town location. Only approximately 3,617 was delivered in the town centre.

Appraisal of Ipswich Town Centre Opportunity Areas Study (DTZ, 2013)

23. This considered the national and local markets in terms of retail and leisure and undertook a review of retail and leisure provision and trends in the town centre to identify strengths, weaknesses, opportunities and threats. It analysed the availability, viability, suitability and deliverability of sites/premises within each of the five opportunity areas (Tower Ramparts, Westgate, Cox Lane, Merchants Quarter and Waterfront) and recommended strategies / future uses for each of these.
24. The appraisal identified that the quantum of development being proposed needs to be reasonable and deliverable as retail development has fundamentally changed, with large schemes no longer deliverable unless in super prime areas.

Northern Fringe, Ipswich – Assessment of Retail Requirements (NLP, 2013)

25. This considered the retail requirements related specifically to the development of the Ipswich Garden Suburb.

Ipswich Borough & Suffolk Coastal District Retail and Commercial Leisure Town Centre Study (WYG, 2017)

26. The key purpose of this study is to act as the evidence base to assist in the formulation of future development plan policy, as well as providing baseline information to assist in the determination of planning applications for retail and leisure development. It supersedes the 2010 study and 2013 opportunity areas appraisal. The study explores retail and commercial leisure need over the plan period to 2036 and provides an up to date review of the performance of the town centre. The Planning Inspector required the Council to undertake a review of future retail provision as part of a future Local Plan Review and this Retail and Commercial Leisure Town Centre Study was commissioned to inform this.

Retail Surveys

27. The Council publishes annually a Central Shopping Area – Identified Frontages Survey and a District and Local Centre Survey. These surveys identify units within each town centre frontage, district centre and local centre and provide brief conclusions on the current situation.
28. Each of the above documents is available to view via the Council's website www.ipswich.gov.uk.

Future Capacity / Needs

29. Under the submission draft Core Strategy DPD 2015, provision for 15,000 sq m of additional retail floorspace was made. This represented a figure considerably lower than the need identified in the 2010 Strategic Perspectives' Retail and Commercial Leisure Study which identified the need for 3,580 – 7,161 sq m of additional convenience retail floorspace and 47,498 sq m of additional comparison retail floorspace across the Borough to 2026. The basis for this under-provision made by the Council was that there had been limited take-up of land for retail floorspace in the past and that delivering multiple retail schemes would likely be challenging and unrealistic to deliver. However, the Inspector did not agree with this reasoning in assessing the Core Strategy DPD and determined that a further review of the floorspace requirement was required as part of a future Local Plan Review with a new allocation figure to be set accordingly.
30. As per the Inspector's request, the Council, working with Suffolk Coastal District Council, commissioned WYG to prepare an updated Retail and Commercial Leisure Needs Assessment (hereafter referred to as "the 2017 Study"). This was published in October 2017.
31. The 2017 Study identifies a need for at least 34,800 sq m net floorspace for comparison goods (non-food) retail to 2036 and additional capacity of at least 1,600 sq m net floorspace for convenience goods retail floorspace to 2036, both after commitments. The NPPF states that planning policies should look ahead at least 10 years in allocating floorspace for retail use. This amounts to 22,000 sq.m gross between 2018 and 2031 of comparison floorspace. The need identified for convenience floorspace identified by the 2017 Study is far smaller and will be accounted for by the proposed District Centre (2,000 sq m net) included as part of the Ipswich Garden Suburb development through policy CS10.
32. Figures 1 and 2 (below) from the 2017 Retail and Commercial Leisure Study breaks down the quantitative need for comparison goods floorspace in Ipswich before (figure 1) and after (figure 2) commitments. This demonstrates how, after commitments, there is no need identified up until 2021 and that only by 2026 is there an identified need of at least 9,600 sq m net comparison floorspace. The 2017 Study sets a quantitative need for 20,800 sq m net of comparison floorspace up to 2031.

Figure 1: Quantitative Need for Comparison Goods Floorspace in Ipswich Borough – Before Commitments

Year	Benchmark Turnover (£m)	Ipswich Borough Turnover (£m)	Ipswich Borough Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq m net)	
					Min	Max
2021	803.9	718.9	90.3	5.3	900	1,600
2026	899.0	873.0	109.6	83.6	12,400	22,700
2031	1,002	1,048	131.6	177.2	23,500	43,200
2036	1,118	1,273	159.8	315.1	37,500	68,800

Source: Tables 16a & 16b of Appendix K
 Benchmark turnover to increase in line with improvements in turnover efficiency as set out in Figure 4b of Experian Retail Planner Briefing Note 14
 Assumes constant market share of Study Area expenditure claimed by facilities in Ipswich Borough
 2015 Prices

Figure 2: Quantitative Need for Comparison Goods Floorspace in Ipswich Borough – After Commitments

Year	Comparison Goods				
	£m			Floorspace Requirement (sq m net)	
	Surplus	Commitments	Residual	Min	Max
2021	5.3	16.8	-11.5	-	-
2026	83.6	18.8	64.9	9,600	17,600
2031	177.2	20.9	156.3	20,800	38,100
2036	315.1	23.3	291.8	34,800	63,700

Source: Table 16c of Appendix K
2015 Prices

33. Policy CS14 of the Core Strategy Review allocates land for 10,000 sq m net of new comparison retail floorspace up to 2031. Table 1 below outlines the allocations included in the Site Allocations Review policy SP10:

Table 1: Proposed allocations in policy SP10 of the Site Allocations DPD Review

Site	Gross area sq m	Estimated net floorspace Gross x 80% x 70%
IP347 - Mecca Bingo, Lloyds Avenue	1137.94 m sq	650
IP348 - East side of Princes Street & Coytes Gardens	1220.02	400
IP348 - West side of Princes Street linking through to Museum Street and up to King Street	2790.59	275
IP048 - West side of Mint Quarter up to Carr St and down to Tacket Street and including 15-23 Upper Brook Street	13700 sq m	4,800
IP040 - North half of Westgate	-	2,050
IP054 - Turret Lane West	400	280
IP132 and IP136 – St Peters Dock	400	280
IP037 Island Site	400	280
IGS comparison allocation		1,220
Sproughton Road District Centre	-	500
Total		10,735

34. The adopted Ipswich Local Plan 2017 focussed its allocation of retail floorspace on delivering a single allocation at the Westgate Site (IP040) which was allocated through policy SP10 of the Site Allocations DPD.
35. The proposed Core Strategy Review and Site Allocations Plan Review seek to split the allocation into a variety of spaces. The Westgate site is still included as an allocation (on the northern part of the site only), but has been reduced in capacity significantly down to 2,050 sq m net floorspace to reflect a more realistic delivery capacity. The largest single allocation proposed is at the Mint Quarter (IP048b) which is currently formed of vacant and occupied shops and a surface level car park. It is envisaged to accommodate approximately 4,800 sq m net retail floorspace as part of a mixed-use residential development. In addition, 1,220 sq m net of comparison retail floorspace is also included as part of the Ipswich Garden Suburb through policy CS10.
36. New allocations for lower levels of retail floorspace are proposed at Mecca Bingo (650 sq m net), extending the Central Shopping Area to upper Princes Street (675 sq m net), the Sroughton Road District Centre (500 sq m net), small elements (280 sq m net) at Turret Lane (IP054), St Peters Dock (IP132 and IP136) and the Island site (IP037) as part of residential-led developments.
37. It is noted that the 10,000 sq m net of floorspace to 2031 does not fully meet the need identified in the 2017 Study. The justification for not fully allocating the identified comparison retail need of 20,800 sq m net to 2031 is to adequately reflect the current and forecast trends in high streets, town centres and other areas of concentrated retail provision nationally. This is explored in further detail below.

Changing nature of high-street nationally

38. The 2017 Study and the survey work of Ipswich Town Centre to inform it took place in January 2017. Since then, there have been significant changes to the performance of retail centres across the country.
39. In terms of the national picture, net store closures in the first half of 2018 reached their highest rate in five years. It was reported¹ that the overall decline was 1,123 store closures, a significant decline compared to the net loss of 222 stores in the equivalent period in 2016. It was evidenced that the rate of store closures of approximately 14 a day was similar to previous years, however, the significant difference was that the rate of new stores opening is now noticeably lower.
40. Furthermore, from January – October 2018 there were 2,875 stores which had gone into administration, more than twice as many for the entirety of 2017, demonstrating the sharp weakening of retail performance in 2018².
41. The retail sectors that have faced the most significant contraction in the high street are fashion and electrical stores. This has been particularly apparent in the past and forecast closures of large high street occupiers such as Debenhams³, House of Fraser⁴,

¹ <https://www.bbc.co.uk/news/business-46142025>

² <http://www.retailresearch.org/whosegonebust.php>

³ <https://news.sky.com/story/debenhams-to-report-biggest-loss-in-240-year-history-as-stores-face-axe-11534561>

⁴ <https://www.bbc.co.uk/news/business-46209147>

New Look⁵ and Maplin⁶. These sectors are especially vulnerable to rising competition from internet shopping. This is a significant threat to the vitality and viability of Ipswich Town Centre, with Debenhams arguably the key department anchor store for the town centre, particularly following the closure of BHS in 2017. It was reported in November 2018 that national consumer spending at department stores was down for the 13th month in a row⁷.

42. The recent significant decline in retail stores has not solely been caused by increased competition from the internet. Consumer spending has fallen following caution in the run-up to the uncertainty surrounding Brexit and what the future will look like after Britain leaves the European Union⁸. The increased business rates and minimum wage requirements for businesses have also increased costs for retailers. The Government has announced plans to reduce business rates for business with a rateable value up to £51,000 but this does not benefit larger retailers who have been disappearing from high streets.
43. Increased vacancy rates and the national decline in high street footfall has had negative impacts on charity shops too, which have declined for the first time in 15 years⁹. In addition, 'pound shops' have suffered a financial squeeze due to the increased business rates, national living wage requirements and poor performance of the pound in recent years¹⁰.
44. Public Health England¹¹ have also acknowledged the crisis that is facing Britain's high streets in their Healthy High Streets Review (2018). When describing the issues facing high streets, they state:

"Changing retail habits in recent years have compounded these issues. An increase in internet and city centre shopping, and the development of large out-of-town shopping malls, has resulted in the closure of many high street shops. This can lead to investment in high streets suffering in comparison with investment in out-of-town shopping centres."
45. Out-of-town shopping has frequently been cited over the years as arguably the main threat to the vitality of city-centre and high-street shopping. However, even this type of comparison retailing has not been immune to the fall in retail performance. For example, Mothercare¹², Toys R Us¹³, B&Q¹⁴ and Homebase¹⁵, typical occupiers of the larger out-of-town retail units, are also planning to close stores across Britain. These have been

⁵ <https://www.bbc.co.uk/news/business-46107834>

⁶ <https://www.bbc.co.uk/news/business-44606771>

⁷ <https://www.retailgazette.co.uk/blog/2018/12/department-store-spending-13th-month-row/>

⁸ <https://www.theguardian.com/business/2018/nov/15/retail-sales-shoppers-brexit>

⁹ <https://nfpsynergy.net/blog/study-second-hand>

¹⁰ <https://www.bbc.co.uk/news/business-44437367>

¹¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/699295/26.01.18_Healthy_High_Streets_Full_Report_Final_version_3.pdf

¹² https://www.bbc.co.uk/news/business-46301911?intlink_from_url=https://www.bbc.co.uk/news/topics/ce1qrvlegiyt/retailing&link_location=live-reporting-story

¹³ <https://www.retailgazette.co.uk/blog/2018/03/3000-jobs-lost-toys-r-us-collapse-100-uk-stores-shut/>

¹⁴ <https://www.telegraph.co.uk/finance/newsbysector/retailandconsumer/11505618/BandQ-to-close-60-stores.html>

¹⁵ <https://www.retailgazette.co.uk/blog/2018/08/42-homebase-stores-shut-cva-approved/>

facing the same threats as in-town shopping of growing online sales, high business rates, and implementation of the national living wage. Furthermore, the improvements to the logistics and delivery sector from online shopping, notably Amazon, makes it far more convenient for consumers to get bulky goods delivered to their home rather than physically visiting stores.

46. Beyond retail, there have also been negative experiences in other sectors in high streets.
47. For example, in the leisure category there was a net decrease of 692 public houses in the first half of 2018, which is over three times as much as the decline in electrical goods stores in the same period¹⁶. It is understood that this has been caused due to changing consumer habits as more people choose to drink at home because of the offers on alcohol at convenience stores and supermarkets.
48. Estate agents have also suffered net losses of 211 stores in the first half of 2018¹⁷. This has been caused by the general slowdown in the housing market, as well as competition from emerging online providers.
49. The restaurant industry is also experiencing difficulties, as companies including Prezzo¹⁸, Byron Burger and Jamie's Italian¹⁹ have announced restaurant closures. This is fuelled by a combination of rising overheads, the fall in the pound and subsequent increase in costs for ingredients, and, changing consumer habits²⁰. Online platforms such as Deliveroo have enabled consumers to order food to their home that would otherwise have meant dining at certain restaurants.
50. The growing retail categories that were reported²¹ included barbers, beauty salons, tobacconists (vaping), mobile phones and cafes/ tea rooms. These categories performed better because they are either able to offer something you cannot obtain online (barbers, beauty salons, café/ tea rooms), or, represent an emerging (vaping shops) or growing (mobile phones) product.

Commitment to review retail need within five years

51. In light of the changing nature of the high street and the other factors listed above, the Council has included a commitment to review retail need within five years as part of proposed Policy CS14: 'Retail Development and Main Town Centre Uses' in the proposed Local Plan Review.
52. It is considered that this would allow for a more accurate and realistic floorspace requirement for comparison retailing to be calculated when the retail position and forecast is more certain given the transitional changes that are currently being faced.

Update to retail assessment to be prepared

¹⁶ Retail and Leisure Market Update: H1 2018 (November 2018). Local Data Company.

¹⁷ Retail and Leisure Market Update: H1 2018 (November 2018). Local Data Company.

¹⁸ <https://www.ft.com/content/7bff00ec-e1e9-11e8-a6e5-792428919cee>

¹⁹ <https://www.theguardian.com/commentisfree/2018/nov/06/restaurants-fail-millennials-jamies-byron-gbk>

²⁰ <https://www.bbc.co.uk/news/business-45962981>

²¹ Retail and Leisure Market Update: H1 2018 (November 2018). Local Data Company.

53. Whilst the Council has confirmed in writing its intention to review retail need in five years, it was also felt appropriate to undertake an update to the 2017 Retail and Commercial Leisure Study. This would provide greater context and research into the issues and challenges facing Ipswich specifically and to determine whether the standard floorspace forecasts need to be moderated to more accurately reflect recent trends that have been experienced since the 2017 Study was prepared. The update will consider both the quantitative and qualitative aspects of the retail picture, specific to Ipswich, to take account of the market trends that the Borough has been experiencing in recent years. This is scheduled to be completed in time to inform the Regulation 19 proposed submission Local Plan Review by summer 2019.

Development Management Policies

54. The Council has reviewed the way that its town-centre related development management policies operate, to provide a more adaptable and proactive policy framework.
55. Feedback from development management officers made it clear that the current adopted Local Plan policies, particularly DM20, are too restrictive and that opportunities to improve the flexibility of relevant policies needed to be explored. This is also recognised by Ipswich Vision which states that consideration must be given to the modern-day customer who views shopping, eating and drinking as a single, joined-up experience.
56. The adopted policy wording is protective of existing retail (A1) uses and makes it difficult for alternative town-centre uses to adopt the vacant retail floor space in the town centre. Although it is acknowledged that the Council has a desire to maintain and improve, where possible, the retail offer of the town centre, it needs to be balanced against the joint-role that alternative town-centre uses, such as food, drink and leisure, are playing in supporting its vitality and viability²² ²³. The proposed changes to permitted development rights and planning use classes set out by the Government (see paragraph 16) are also evidence that there is a need to look beyond retail (A1) in town centres.
57. The key changes to development management policies are explored below:

DM20: The Central Shopping Area

Revisions to the Central Shopping Area

58. The 2017 Retail and Commercial Leisure Study recommended various changes to the primary, secondary and specialist shopping frontage zones which are set out below:

²² <https://www.theguardian.com/lifeandstyle/2018/nov/18/christmas-shopping-black-friday-generation-z-high-street>

²³ <http://www.vanishinghighstreet.com/wp-content/uploads/2018/07/GrimseyReview2.pdf>

Figure 6: Recommended Boundary & Frontage changes in the 2017 Retail and Commercial Leisure Study

Boundary/ Frontage	Comments/Recommendations
Town Centre Boundary	<ul style="list-style-type: none"> • Curtail to the east to exclude land to the east of The Regent Theatre Car Park and Bond Street (primarily residential area). This area includes Grimwade Street and Woodbridge Road local centres. • It is noted that the town centre boundary covers a large area extending to the west beyond Civic Drive, Franciscan Way and Grey Friars Road (including Cardinal Park to Portmans Walk/W End Road junction). We broadly support the current extent of the boundary. However, the Council need to be aware that, with the exception of A1 use, all other main town centre uses are acceptable in principle within the town centre boundary. This could have a potential negative impact in terms of seeking to prioritise such uses (eg food and drink) to the more central parts of the town centre (albeit prioritising A1 uses in the PSFZ) and the Waterfront area.
Central Shopping Area	<ul style="list-style-type: none"> • Given that the PSFZ, SSFZ, and SPFZ constitute the Central Shopping Area please refer to our comments/recommendations for these frontages below.
Primary Shopping Area	<ul style="list-style-type: none"> • Given that the PSFZ and SSFZ constitute the Primary Shopping Area please refer to our comments/recommendations for these frontages below.
Primary Shopping Frontage Zone	<ul style="list-style-type: none"> • Extend to include western and eastern end of Buttermarket (currently identified as SSFZ) • Extend to include western side of Upper Brook Street (currently identified as SSFZ) • Extend to include the Town Hall and Lloyds building on Corn Hill (subject to potential for conversion to A1 retail) (currently identified as SSFZ)
Secondary Shopping Frontage Zone	<ul style="list-style-type: none"> • Extend to include Mecca Bingo on Lloyds Avenue (currently identified as SPFZ) • Extend to include Upper end of Princes Street (from its junction with Museum Street to Buttermarket). • Extend to include Northgate Street and Great Colman Street (currently identified as SPFZ) • Retention of Westgate site in SSFZ (and thus PSA and CSA) supported. • Retention of the western part of the Mint Quarter site in SSFZ (and thus PSA and CSA) (subject to further site assessment work) • Remove the Town Hall and Lloyds building on Corn Hill (subject to potential for conversion to A1 retail) (identified as PSFZ) • Remove western and eastern end of Buttermarket (identified as PSFZ)) • Remove western side of Upper Brook Street (identified as PSFZ)
Specialist Shopping Frontage Zone	<ul style="list-style-type: none"> • Extend to include middle part of Upper Orwell Street. • Remove Mecca Bingo on Lloyds Avenue (identified as SSFZ). • Remove Northgate Street and Great Colman Street (identified as SSFZ)

59. A full list of the recommendations and whether they have been implemented or not can be viewed in appendix 4.

Change from frontages to sub-groups

60. The use of frontages to count the amount of retail (A1) and non-retail uses along a given street has been replaced by sub-groups.

61. The preferred options Local Plan Review advocates an approach whereby the retail provision is calculated against larger sub-groups of units which typically also includes units on surrounding streets. Initial research has concluded that grouping premises into larger sub-groups increases the quantity of retail units recorded and thus improves the flexibility of the policy.

62. Furthermore, the existing frontage-measurement approach to calculating the proportion of uses is proposed to be replaced by a unit-counting approach. The majority of other Local Planning Authorities use a unit method to determining concentrations of uses.

Introduction of alternative circumstances

63. The NPPF states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries. As such, an additional paragraph has been proposed which would allow decision-makers to apply a degree of discretion where changes of use would fail to accord with the target thresholds of the policy:

“Proposals for non-A1 uses that would exceed the maximum thresholds for each sub-group of the Shopping Zone 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.”

64. Supporting text has been added to the reasoned justification of the policy to explain the factors that will be considered in these circumstances. The factors include:
- The amount of time that the existing use has been vacant, including any information regarding the marketing of the unit;
 - The presence of other vacant A1 units in the Shopping Zone, including any information regarding the marketing of these units;
 - The contribution that the proposed non-A1 use would make to the vitality and viability of the Shopping Zone and wider Central Shopping Area;
 - The active frontage of the proposed non-A1 use, taking into consideration the physical frontage, hours of use and type of use; and
 - The size of the unit.

District and Local Centres

65. The district centres in Ipswich were found to all display reasonable or good levels of vitality and viability in the 2017 Retail and Commercial Leisure Study. All of the district centres were identified as being anchored by a foodstore/ convenience store.
66. Prince of Wales Drive local centre has been removed as it is now allocated for housing (IP307). The retail units that formed the local centre were all identified as being vacant around mid-2018. It is understood that the former co-op unit, the largest of the three units, has recently been re-occupied as a charity shop. Notwithstanding this, the land owner has confirmed that they are supportive of residential re-use. Given the need for housing in the Borough and the availability of alternative shops within approximately 275m (Maidenhall Green) and 550m (Stoke Park Drive), a decision was made to allocate this for housing.
67. A new district centre is proposed at Sproughton Road. This has been carried forward from the 2017 adopted Local Plan Review but in a slightly different location and has been earmarked for a potential district centre in all of the retail and leisure studies since 2005. 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.

68. There are currently 11 district centres and 34 local centres across the Borough of Ipswich defined through the adopted Local Plan. These are listed in appendix 2 and shown in appendix 3.
69. As stated earlier, the 2017 Retail and Commercial Leisure Study highlighted that the district centres were in reasonable or good condition in terms of their health. However, it did draw out some deficiencies in certain district centres:
 - With the exception of Woodbridge Road, Ravenswood, and Felixstowe Road district centres, there are no financial banking services within the district centres. The majority do however provide ATM facilities;
 - The health of the Wherstead Road District Centre would benefit from some enhancements to its environment and improvements to shop/service fronts;
 - One sixth of the units in Norwich Road District Centre are currently vacant. However, the units are small and interspersed throughout the centre;
 - Duke Street District Centre was recorded as having a high vacancy rate, although this has since improved; and
 - Whilst Woodbridge Road/Cauldwell Hall Road District Centre is considered to be healthy due to residential properties being interspersed between retail/service units the extent/definition of the centre is not particularly clear. The western part of Felixstowe Road District Centre and the northern Nacton Road District Centre also have similar issues.
70. Overall, the 2017 Retail and Commercial Leisure Study did not consider that any of the Borough's district centres require substantial retail or leisure development in order to improve their vitality and viability.
71. The Council's District and Local Centres Survey Report (October 2017) monitored the status of the district and local centres in the Borough. It drew the following conclusions:
 - Ipswich's Local and District Centres have different characters and experience different development pressures. Overall, the majority of District and Local Centres continue to do well, providing a range of goods and services with an emphasis on retail provision and in particular food and household items;
 - Three District Centres and twenty Local Centres are operating with no empty shop units and in most centres where there are vacant units there are only one or two;
 - After retail provision, the most common types of businesses are hairdressers and hot food takeaways;
 - Across all District and Local Centre frontages, the aim to limit A2-A5 uses, betting shops and payday loan shops, D1 uses and sui generis uses to 40% is being met in 71% of instances. Of the 34 Local Centres, 10 (29%) have in excess of 40% of their frontage length given over to A2-A5, D1 and Sui Generis Uses;
 - Across all District and Local Centre frontages the aim to limit A4-A5 uses to 20% is being met in 56% of instances. Of the 34 Local Centres 17 (50%) have in excess of 20% of their frontage length given over to A4 and A5 uses and the same applies to 3 of the 11 (27.3%) District Centres; and

- There are 67 residential units in both Districts and Local Centres, a slight increase on previous years.

Out of Centre and Edge of Centre

72. Policy DM22 regarding non-retail town-centre uses outside the Central Shopping Area is not proposed to be changed as part of this local plan review in terms of the policy wording.
73. Policy DM23 relates to retail proposals outside defined centres. Criterion c has been expanded to include reference to the cumulative impact on defined centres that the proposal may have. This is to take account of other committed and planned investments in the nearby area which, combined with any proposed retail proposal outside a defined centre, may be deemed to have an adverse impact that was not accounted for.
74. The adopted wording of DM23 requires retail proposals for more than 200 sq m net floorspace outside defined centres to assess the retail impact on all defined centres which includes the central shopping area. The 2017 Study recommended that the impact on the central shopping area should only be required on proposals of 525 sq m net or more. This would enable sufficient flexibility to assess the merits and potential implications of edge and out-of-centre retail applications. This recommendation has been included in the Local Plan Review and the following sentence added:

“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.”

Food & Drink

Restaurants

75. The opening of the reconfigured Buttermarket in early 2017 introduced a range of national chains into the town centre including; Byron Burger, Coast-to-Coast, Prezzo and Wagamama. As a result of this, the food and drink offer of Ipswich has become much closer to the UK average. In addition, there are a number of café/ restaurants along the Waterfront including Wiff Waff, Waterfront Bistro and Isaacs.
76. As explained in paragraph 66 of this paper, there are indications that the traditional chain stores in the restaurant sector are struggling to maintain their presence in town centres. Notwithstanding this, independent and artisan style restaurants have been improving their stature as part of the evolution of the high-street whereby visitors are looking for unique food and more of an ‘experience’. The rolling out of online delivery platforms such as Deliveroo and Uber Eats has also enabled many independent, niche restaurants to reach a wider audience, with some restaurants factoring this into their internal layouts²⁴.

Cafes/ Tea Rooms

77. Cafes and Tea Rooms have become an increasing presence in town centres and are the fastest growing sub-sector of the food and drink industry. Almost 500 new

²⁴ <https://www.wired.co.uk/article/food-delivery-app-deliveroo-creating-dark-kitchen-restaurants>

independent coffee bars opened their doors on high streets across the UK between 2012 and 2017 (a net increase of 9%)²⁵. The nation is predicted to see a further 780 new independent coffee bars open by 2023 as the overall number will increase by another 13% on today's levels²⁶. This increase has been driven by the change in culture of younger people, as cafes and tea rooms are being treated as the key social hub to meet friends, as fewer people go to public houses and bars²⁷.

78. The 2017 Study does not identify a significant deficiency in cafes/ tea rooms in Ipswich but does note that there is a need for new cafes and tea rooms to be provided in the town centre. The proposed amendments to the Central Shopping Area policy are anticipated to ensure that this need is not unduly restricted. Since the time of the 2017 Study, there have been some additions to the town centre in terms of cafes/ tea rooms, including the imminent opening of Pret-a-manger on the corner of Cornhill. This will play a critical role in animating the recent public realm improvements and encourage visitors to stay for longer in the town centre.

Public Houses and Bars

79. Public Houses and Bars have faced significant declines in recent years, facing an annual change of -1.3% from 2014 – 2019²⁸. Around 1 in 4 public houses nationally have closed since 2008, with smaller independent public houses suffering the most²⁹. This has been caused by a combination of changing consumer habits, cheaper convenience shopping prices, higher drink prices and a squeeze on household finances.³⁰
80. Many public houses have diversified to predominantly serve food which is becoming more popular. This has resulted in pubs having to employ greater amounts of staff which has subsequently created additional overheads³¹. Consequently, the market share of public houses are typically larger pubs which are run by commercial chains such as JD Wetherspoon.
81. In November 2018, the Office for National Statistics identified that the number of public houses in Ipswich has shrunk considerably since 2001. In 2001 there were 95 public houses whereas in 2018 there were 55. This decline is reflected in the recent closures of the Golden Lion, the Mulberry Tree and the Swan in the town centre.

²⁵ <https://www.specialityfoodmagazine.com/news/success-is-brewing-for-independent-coffee-shops>

²⁶ <http://coffeebusinessworld.com/latest-news/coffee-shop-boom-far-from-over-03-12-2018/>

²⁷ <http://www.retailtimes.co.uk/success-is-brewing-for-independent-coffee-shops-american-express-and-globaldata-find/>

²⁸ <https://www.ibisworld.co.uk/industry-trends/market-research-reports/accommodation-food-service-activities/pubs-bars.html>

²⁹ <https://www.thedrinksbusiness.com/2018/11/four-things-we-learned-from-the-ons-pub-industry-report/>

³⁰ <https://www.bbc.co.uk/news/business-45086080>

³¹ <https://www.bbc.co.uk/news/business-46343963>

Figure 8: Pub Closures in Ipswich 2001 - 2018

There are now around 40 fewer pubs in Ipswich than in 2001



Source: East Anglian Daily Times (28 November 2018) -

<https://www.eadt.co.uk/business/the-suffolk-pub-trade-how-pubs-are-diversifying-1-5799032>

82. The 2017 Study identified that the proportion of bar/public house units (4%) and floorspace (6%) was comparable to the UK average. In addition, the recent opening of the 'Three Wise Monkeys' on Lloyds Avenue and re-opening of the Falcon demonstrate there is still some demand in the town centre. Overall, the provision was considered to be reasonably good.

Nightclubs

83. Similar to public houses and bars, nightclubs have also been waning with revenue declining 21% from 2010 to 2015 and admissions down by 23% in the same period³². This decline has been caused by increased competition from bars and pubs, which since 2005 have been permitted to serve alcohol after 11pm. Again, the changing drinking culture has had a negative impact on nightclubs as people are drinking less and one-fifth of Britons aged 16 – 24 now identify as teetotal³³. Again, squeezes on living costs and tuition fee rises have meant that much of its target audiences have either stopped attending, or, spend little inside nightclubs by drinking at home for example to avoid buying more expensive drinks. To cover lost revenue, nightclubs have been forced to increase entry prices which has again turned people away³⁴.

³² <http://www.mintel.com/press-centre/leisure/last-orders-for-nightclubs-uk-nightclub-attendance-drops-by-34-million-in-5-years>

³³ <https://www.independent.co.uk/news/health/alcohol-drinking-britain-habits-booze-consumption-ons-data-a7716186.html>

³⁴ <https://www.itv.com/news/2016-09-24/brits-abandon-nightclubs-as-entry-and-drinks-prices-soar/>

84. Ipswich has a reasonable nightclub provision as it is the main hub in the wider catchment area of Suffolk. There are two dedicated nightclubs in Ipswich; Unit 17 at Cardinal park and KC's Nightclub in the town centre. There are also a variety of 'chameleon' style bars which tend to serve food during the day and then offer late-night dancing in the evenings. Examples of this include; Vodka Revolution at the Buttermarket, New York Exchange Bar and Sin Bar near the Cattle Market Bus Station, and, Isaacs on the Waterfront.

Leisure Uses

Health and Fitness

85. From 2017 to 2018 there was an increase of 154 gyms in high streets, retail parks, shopping centres and out of town locations³⁵. High streets saw a 6% increase in the number of gyms present. In the East of England, the number of gyms increased by 5%, the joint third of the 11 regions that were surveyed. As reported earlier, the decrease in drinking has left a void for leisure and social time which the fitness industry has capitalised on. It is predicted that the industry will continue to steadily increase as consumer habits change and the need to look and feel good comes to the forefront of culture. Other external factors such as the Government's ambition to tackle obesity and the sugar tax have brought wellness to the foreground.
86. Ipswich has a good range of gyms available. The addition of Pure Gym in the Buttermarket in 2017 and long-standing presence of Crown Pools provide facilities in the town centre. Outside the central area, there are larger sized gyms in the form of Better Gym, DW fitness and The Gym, as well as offerings in the wider area such as Energise at Chantry and FTC gym on the Whitehouse Road Industrial estate. Furthermore, there are sports centres owned by Ipswich Borough Council and specialist facilities such as David Lloyd.
87. The 2017 Study anticipates that Ipswich will need to provide between 5 – 7 additional gyms to meet anticipated demand by 2036. This will likely be achieved through changes of use of existing premises such as large retail units and employment units.

Cinema

88. Ipswich has three cinemas; The Ipswich Film Theatre (Corn Exchange), Cineworld (Cardinal Park) and Empire (Buttermarket). These facilities cater for residents and visitors, as well as a wider catchment in the surrounding districts. The opening of the Empire cinema resulted in the number of screens in Ipswich doubling from 13 to 27. This is significantly higher than the need forecast in the 2017 Study, and as such the cinema offering is considered to be good.

Tenpin bowling

³⁵ https://www.localdatacompany.com/blog/no-frills-fitness?utm_campaign=AWOTHS%20-%209th%20Jan&utm_medium=email&hsenc=p2ANqtz-9FTcjjvWwM-JZjYpA2kJ7wHBhCOcKQN06FF1xRRwy7Til01kPwzzqJ0wkyqDEXm_TUne64cmcagJyR9Hr6Sy-SAFWMYQYZkuHXu-nikTL7OsVoeEU&hsmi=67880713&utm_content=67880713&utm_source=hs_email&hsCtaTracking=1590f516-a651-44d1-84b6-b2da102a049c%7C6281e8ad-c6c1-4cb7-8d47-ad863e237491

89. In terms of ten pin bowling offer, there are two facilities in the Borough; Namco Funscape (Sproughton Road) and Superbowl UK (Buttermarket). It should be noted that Namco Funscape closed down the week of 7th January 2019 and that there is an extant permission (15/00945/FUL) for a change of use of the Namco Funscape bowling alley (D2) to non-food retail (A1) which has not been implemented. At this time, it has not been announced whether a future bowling operator is due to re-open the facility or not. There was a smaller facility at Bear's Boutique Bowling bar and American Restaurant in the town centre but this closed down in 2016 and re-opened as a pool and snooker club. There is also Tenpin at Martlesham Heath, immediately outside Ipswich in the 'Eastern Fringe' and this is the largest bowling facility in the wider area as it has 20 lanes.
90. The 2017 Study identifies that by 2036 there is an anticipated demand for approximately 45 lanes in Ipswich and Suffolk Coastal administrative areas. There are already 44 lanes in the area and therefore there is no requirement to increase the tenpin bowling offer during the plan period.

Bingo

91. There are two bingo halls in Ipswich; Mecca Bingo at Lloyds Avenue in the town centre and Gala Bingo at the Orwell Retail Park. There are currently no requirements from bingo operators for traditional halls in the Borough and it is anticipated that there won't be a need for an additional bingo hall to 2036.
92. The 2017 Study did highlight how Mecca Bingo may have a desire to open a new high street online bingo format store (Luda Bingo). However, this would be a relatively small store that could be accommodated through the conversion of an existing shop in the town centre if necessary, particularly in light of the efforts to improve the flexibility of uses in the central shopping area.
93. The Mecca Bingo site (IP347) at Lloyds Avenue has been proposed to be allocated for 650 sq. m net comparison retail floorspace in the preferred options Local Plan review. However this retail floorspace provision has been allocated on the basis of the ground-floor being used for retail only and would potentially allow for a bingo hall to be accommodated on the upper-floor of the building.

Arts and Cultural Activities

94. There are eight organisations in Ipswich that are Arts Council England (ACE) National Portfolio Organisations (NPOs); New Wolsey Theatre, DanceEast, Pacitti Company, Gecko, Eastern Angles, Russell Maliphant Company, Suffolk Libraries and Colchester & Ipswich Museum Service. Ipswich has one of the highest concentrations in the country of organisations receiving regular funding from ACE. Most of these organisations, as well as Red Rose Chain and Tilted Productions, form We Are Ipswich which created a Cultural Manifesto that sets out a commitment to cultural, social and economic growth in Ipswich.
95. Ipswich is also host to a range of museums including; Ipswich Museum, Ipswich Transport Museum, Clifford Road Air Raid Shelter Museum, Christchurch Mansion and Wolsey Art Gallery. Furthermore, there are seven theatre venues, including the Ipswich Regent which attracts nationally recognised performers and shows. A variety of festivals and events are regularly organised across the town, such as the Heritage

Open Days, SPILL Festival and Ipswich Maritime Festival. Arts and cultural activities in Ipswich are promoted actively by a series of groups, including; All About Ipswich, Visit Suffolk and Ipswich Town and Waterfront.

96. In light of Ipswich's strong arts and cultural offer, the 2017 Study did not consider there to be a current requirement for new cultural facilities in Ipswich.

Hotels

97. As of 2017, Ipswich had a total of 23 hotels. These were predominantly towards the budget (3* and below) end of the market, with national operators such as Premier Inn and Travelodge occupying the majority of these hotels. In addition, a new 'super budget' hotel in the form of Easy Hotel is expected to open in the town centre from 2019 which will offer rooms from £9.99.
98. The 2017 Study highlighted that there are gaps in the bottom and top of the market with no 5* provision or hostel/ super budget provision. Whilst the bottom gap has been filled to a degree by the Easy Hotel addition, there is still a need to provide for the up-market end of hotel provision. The proposed Site Allocations DPD includes hotels as part of mixed-use allocations at Commercial Road (IP047) and the old Cattle Market at Portman Road which may allow for this void to be filled. The proposed Core Strategy is also supportive of hotel uses in the town centre.

Appendix 1 – Use Classes

Source: Planning Portal

<http://www.planningportal.gov.uk/permission/commonprojects/changeofuse/>

A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices (but not sorting offices), pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.

A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) including estate and employment agencies and betting offices.

A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.

A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs).

A5 Hot food takeaways - For the sale of hot food for consumption off the premises.

B1 Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

B2 General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).

B8 Storage or distribution - This class includes open air storage.

C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).

C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.

C3 Dwellinghouses - this class is formed of 3 parts:

C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.

C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.

C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

C4 Houses in multiple occupation - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non residential education and training centres.

D2 Assembly and leisure - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).

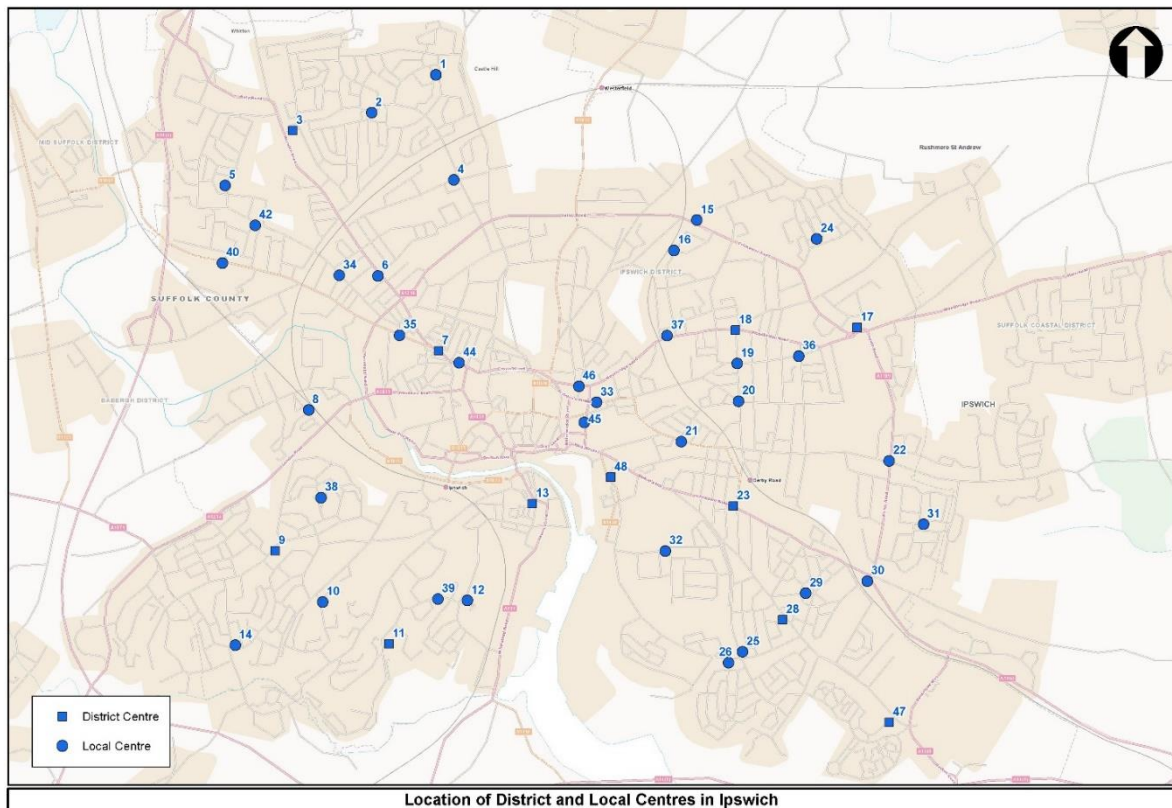
Sui Generis - Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: theatres, houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses, amusement centres and casinos.

Appendix 2 – Ipswich Borough Council District and Local Centres

<u>District Centres</u>	<u>Local Centres</u>
3. Meredith Road	1. Fircroft Road
7. Norwich Road (1-91, 2-110) / Bramford Road	2. Garrick Way
9. Hawthorn Drive	4. Dale Hall Lane/ Dales Road
11. Stoke Park	5. Ulster Avenue
13. Wherstead Road/ Austin Street	6. Norwich Road (197 – 307a)
17. Woodbridge Road East (27-53) / Heath Road	8. Dickens Road
18. Cauldwell Hall Road / Woodbridge Road (418-785)	10. Cambridge Drive
23. Felixstowe Road (55-201, 120-190)	12. Maidenhall Green
28. Nacton Road (270-374)	14. Ellenbrook Green
47. Ravenswood	15. Colchester Road
48. Duke Street	16. Brunswick Road
	19. Cauldwell Hall Road/ Spring Road
	20. Cauldwell Hall Road/ St John's Road
	21. Foxhall Road (25-97, 34-124)
	22. Bixley Road/ Foxhall Road
	24. Selkirk Road
	25. Clapgate Lane (207-221)/ Landseer Road (325-327a)
	26. Reynolds Road
	29. Queen's Way
	30 Felixstowe Road (474 – 486)
	31. Penshurst Road

	32. Cliff Lane
	33. St Helen's Street
	34. Bramford Lane
	35. Bramford Road
	36. Spring Road
	37. Albion Hill, Woodbridge Road
	38. Lavender Hill
	39. Prince of Wales Drive
	40. Bramford Road (560 and 651-677)
	42. Bramford Lane (483 – 487)
	44. St. Matthew's Street
	45. Grimwade Street
	46. Woodbridge Road (26 – 110)

Appendix 3 – Location of District and Local Centres in Ipswich



Appendix 4: Recommendations and changes to retail boundaries and frontages

Boundary/ Frontage	Recommendation	Implemented?
Town Centre Boundary	Curtail to the east to exclude land to the east of The Regent Theatre Car Park and Bond Street (primarily residential area). This area includes Grimwade Street and Woodbridge Road local centres.	Not Implemented
	It is noted that the town centre boundary covers a large area extending to the west beyond Civic Drive, Franciscan Way and Grey Friars Road (including Cardinal Park to Portmans Walk/W End Road junction). We broadly support the current extent of the boundary. However, the Council need to be aware that, with the exception of A1 use, all other main town centre uses are acceptable in principle within the town centre boundary. This could have a potential negative impact in terms of seeking to prioritise such uses (eg food and drink) to the more central parts of the town centre (albeit prioritising A1 uses in the PSFZ) and the Waterfront area.	Not Implemented
Central Shopping Area	Given that the PSFZ, SSFZ, and SPFZ constitute the Central Shopping Area please refer to our comments/ recommendations for these frontages below.	(see below)
Primary Shopping Area	Given that the PSFZ and SSFZ constitute the Primary Shopping Area please refer to our comments/ recommendations for these frontages below.	(see below)
Primary Shopping Frontage Zone	Extend to include western and eastern end of Buttermarket (currently identified as SSFZ)	Implemented
	Extend to include western side of Upper Brook Street (currently identified as SSFZ)	Implemented
	Extend to include the Town Hall and Lloyds building on Corn Hill (subject to potential for conversion to A1 retail) (currently identified as SSFZ)	Not implemented
Secondary Shopping Frontage Zone	Extend to include Mecca Bingo on Lloyds Avenue (currently identified as SPFZ)	Implemented

	Extend to include Upper end of Princes Street (from its junction with Museum Street to Buttermarket).	Implemented but not as extensively as suggested (units on Elm St, Arcade St and Coytes Gardens excluded due to large number of residential units)
	Extend to include Northgate Street and Great Colman Street (currently identified as SPFZ)	Implemented
	Retention of Westgate site in SSFZ (and thus PSA and CSA) supported.	Implemented
	Retention of the western part of the Mint Quarter site in SSFZ (and thus PSA and CSA) (subject to further site assessment work)	Implemented
	Remove the Town Hall and Lloyds building on Corn Hill (subject to potential for conversion to A1 retail) (identified as PSFZ)	Not Implemented
	Remove western and eastern end of Buttermarket (identified as PSFZ)	Implemented
	Remove western side of Upper Brook Street (identified as PSFZ)	Implemented
Specialist Shopping Frontage Zone	Extend to include middle part of Upper Orwell Street.	Not Implemented due to the west side being within the residential allocation IP048 and many of the buildings have been demolished
	Remove Mecca Bingo on Lloyds Avenue (identified as SSFZ).	Implemented
	Remove Northgate Street and Great Colman Street (identified as SSFZ)	Implemented

Post Submission (Regulation 22) Addendum (August 2020)

Purpose of Addendum

1. Since January 2019, there has been several material changes in terms of retail planning, both nationally and locally, that warrant consideration and comment from the Council. The purpose of this addendum is to set out the Council's position in respect of these changes.

National Changes

Revised National Planning Policy Framework (NPPF) February 2019

2. In February 2019 the revised NPPF was published, updating the 2018 NPPF which this topic paper was originally based on. However, in reviewing the revised 2019 NPPF, it is clear that Chapter 7 'Ensuring the Vitality of Town Centres' has not been amended as a result of this update. Therefore, it is considered that this has not altered the Council's position in this respect.

Revised National Planning Practice Guidance (PPG) July 2019

3. In July 2019 the Government published new planning practice guidance on the topic of town centre and retail matters. The new PPG 'Town Centres and Retail' replaced the originally published 2014 PPG 'Ensuring the Vitality of Town Centres'. The new PPG provides guidance on the implementation of the principles set out in Chapter 7 of the revised NPPF and has three core areas:
 - Planning for town centre vitality and viability;
 - Permitted development and change of use in town centres; and
 - Assessing proposals for out of centre development
4. The subject of 'Permitted development and change of use in town centres' is guidance on what constitutes a material change of use and sets out for clarification what changes of use are permitted development and what changes of use require prior approval. As this is focussed on the development management process and its relationship to the Town and Country Planning Act and General Permitted Development Order, it does not have any material impact on the Local Plan Review policies.
5. The subject of 'Planning for town centre vitality and viability' is relevant to the Local Plan Review and influences the strategic related policy (CS14 Retail Development and Main Town Centre Uses) and the delivery related policies (DM27 The Central Shopping Area, DM29 The Evening and Night-time Economy and DM30 District and Local Centres). The guidance sets out what measures Local Planning Authorities could take to support the management adaptation and growth of town centres. These include for example; trying to accommodate all forecast needs for main town centre uses in the town centre, defining primary and secondary retail frontages where appropriate, encouraging evening and night time activities, and, supporting a wide range of complementary uses to help the vitality of town centres, including pop-up shops where appropriate. Having reviewed the July 2019 PPG, it is considered that the Council's approach to retail development and the town centre set out in the Local Plan Review align with this.

6. The other sub-heading of 'Assessing proposals for out of centre development' is relevant to both the Local Plan Review and the implementation of the sequential and impact tests in development management. In terms of the Local Plan Review, policies DM31 (Town Centre Uses Outside the Central Shopping Area) and DM32 (Retail Proposals Outside Defined Centres) are relevant. After reviewing the 2019 PPG, no changes to either of these policies were necessary and were deemed compliant with the NPPF and PPG.

Town and Country Planning (Use Classes) (Amendment) (England) Regulation 2020

7. On 21 July 2020 the Government published the Town and Country Planning (Use Classes) (Amendment) (England) Regulation 2020. The amended regulations come into force on 1 September 2020.
8. The amended regulations represent a significant overhaul of the Town and Country Planning (Use Classes) Order 1987 (as amended). Notably for retail and town centre purposes is the creation of the new 'Class E: Commercial, Business and Service' use class which will result in the absorption of existing shops (A1), financial and professional services (A2), restaurants and cafes (A3), and business use (B1) into one use class thereby making the change of use between these types of uses permitted development without reference to the local planning authority. The new Class E will not be coming into force until September 2020. In addition, new classes 'F1: Learning and Non-Residential Institutions' and 'F2: Local Community' are also introduced, whilst uses such as public houses, wine bars or drinking establishments are now effectively sui-generis uses.
9. The amended regulations will therefore have a significant impact across multiple aspects of the Local Plan Review since it was published for submission in June 2020. For example, Policies DM27 (The Central Shopping Area) and DM30 (District and Local Centres) have been formulated on the principle of managing the amounts of non-retail (A1) uses based on different circumstances. However, as traditional retail (A1) uses will now be treated as part of a broader use class (Class E), inevitably this will require some modification to these policies in particular.
10. As the amended regulations were announced after the submission of the Local Plan Review, the Council has not at this time prepared any proposed modifications to any policies. However, the Council will review its position as the Local Plan Review continues to progress through the examination process.

Local Changes

Retail Position Update Statement – August 2019

11. As set out at the time of writing this topic paper, the Council was in the process of commissioning a Retail Position Update Statement. The purpose of this update statement was to determine whether the standard floorspace forecasts need to be moderated to more accurately reflect recent trends that have been experienced since the 2017 Study was prepared.

12. In August 2019, the update statement was published³⁶. The update statement found that the comparison floorspace requirement in Ipswich had reduced compared to the original 2017 Retail Study. This was due to reduced forecasts of growth in comparison goods expenditure per head, higher forecasts of growth in internet shopping, and a higher forecast comparison goods sales density growth. Figure 5.1 below outlines the quantitative retail need for the Borough:

Figure 5.1: Quantitative Need Capacity Summary (sq m net)

Sector	2029 (Minimum NPPF Period)
Before Commitments	
Comparison Goods	11,200sq m - excluding Copdock/Interchange 11,800sq m - including Copdock/Interchange
Convenience Goods	1,700-2,100sq m
After Commitments	
Comparison Goods	9,900sq m - excluding Copdock/Interchange 10,500sq m - including Copdock/Interchange
Convenience Goods	nil

13. The identified comparison need for the Borough is 9,900sq m. The Local Plan Review has allocated sufficient land for 10,550sq m net comparison floorspace (see table 1³⁷). In conclusion, this update statement has determined that the Council does not need to plan for any additional sites in the Local Plan Review to meet comparison good needs in the Borough.

Policy DM27: The Central Shopping Area

14. One of the main points the topic paper as originally drafted explained was the proposed change to the Central Shopping Area policy (DM26 at Preferred Options) compared to the adopted Local Plan equivalent. The principle of the policy change was to make the policy more flexible and allow the town centre to adapt to rapid changes, in keeping with the ambitions of the revised NPPF (2018 at the time).

15. However, following the Preferred Options (Regulation 18) consultation that culminated in March 2019, it was decided that part of the policy as worded was too complex and that the application of the policy required amendment to make it easier to use from a delivery perspective. In addition, there were some notable retail trends from more recent Central Shopping Area surveys that warranted a need to increase the flexibility of the policy.

³⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_retail_position_update_statement_-_02-08-19.pdf

³⁷ Please note that the anticipated capacity of the Sproughton Road District Centre has been reduced from 500sqm to 315sqm to reflect planning permission 18/00948/OUTFL. This has reduced the total capacity of the Local Plan Review down from 10,735sqm to 10,550sqm.

The key changes between the Preferred Options policy and the Final Draft (Regulation 19) versions of the policy were as follows:

- Removing the 'sub-zones' from the Primary Shopping Area;
- Increasing the threshold for non-A1 uses in the Primary Shopping Area from 15% to 30%;
- Increase the threshold for non-A1 uses in the Secondary Shopping Area from 25% to 35%; and
- Support for po-up shops and restaurants in vacant shopfronts.

Retail Surveys

16. Since the publication of the original Topic Paper in January 2019, the Council has published the November 2019 Central Shopping Area Survey and the December 2019 District and Local Centre Survey³⁸.
17. As stated in paragraph 15, the impact of the Central Shopping Area Survey (November 2019)³⁹ resulted in amendments to the thresholds of the Central Shopping Area policy (DM27). Section D (page 60) of the Central Shopping Area Survey explain the findings and conclusions in greater detail.

³⁸ <https://www.ipswich.gov.uk/content/retail-surveys>

³⁹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019_csa_final_version.pdf