

Ipswich Borough Council Local Plan Review

Infrastructure Delivery Plan



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Introduction

This document amplifies the Infrastructure Table 8a in the final draft Ipswich Local Plan Review 2018-2036. This Infrastructure Table has been built up in collaboration with infrastructure providers and outlines funding sources including contributions required from developers.

In order for Ipswich to accommodate growth to provide housing and employment opportunities for local residents to meet their needs, the provision of infrastructure is essential to ensure that growth does not put undue pressure on existing infrastructure serving the town and ensures the smooth delivery of new development.

The term “infrastructure” is broad and can compass many aspects of social, economic and environment issues. There is no set definition of infrastructure within the NPPF but it is generally taken to include a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences. By its very nature, it underpins everything we do and is fundamental to our daily lives. Infrastructure supports new development and facilitates the growth of jobs and access to technology and services.

This Infrastructure Plan has a base date of September 2020 and the findings are a ‘snapshot’ of information held at that time. Therefore, some of the information may be subject to change. The Council intends to use the Infrastructure Plan as a ‘living document’ which will be reviewed accordingly alongside the annual publication of Infrastructure Funding Statements as required by legislation and national policy.

The identification of the provision of infrastructure within the Infrastructure Plan does not guarantee that the Council would necessarily grant planning permission for that infrastructure. All planning applications for new or improved infrastructure will continue to be assessed against the appropriate development plan and material planning considerations.

National Policy, Guidance & Legislation

National Planning Policy Framework (NPPF)

The National Planning Policy Framework states that Local Plans should include strategic policies for the provision of infrastructure needs such as transport, telecommunications, security, waste management, utilities flood risk and coastal change management, green infrastructure and community infrastructure such as schools, health, and cultural infrastructure. In terms of schools, the framework is explicit that there should be enough choice of school places available to meet the needs of existing and new communities. The framework encourages local planning authorities to take a proactive, positive and collaborative approach to meeting this requirement. It also states that plans should also anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

The NPPF anticipates that Local Plans should be shaped by engagement with infrastructure providers and operators and collaboration should inform an assessment of the quality and capacity of infrastructure, and its ability to meet forecast demands. The guidance notes that where deficiencies are identified, policies should set out how those deficiencies will be addressed. Local Plans should also set out the contributions expected from development, including contributions towards infrastructure.

Section 106 and Unilateral Undertakings; and Community Infrastructure Levy (CIL)

In Ipswich, the current method to raise funds from developers for the provision of infrastructure is through planning obligations. These are legal obligations which are made under Section 106 of the Town and Country and Planning Act 1990, and are designed to minimise the impact of the new development on the local community, typically by providing infrastructure, facilities, or affordable housing to mitigate the impacts of a development proposal on the local community.

This means that where sufficient capacity does not already exist to meet the need created by new occupiers or users, the development should contribute what is necessary, either on site or through a financial contribution. This will be done through the planning decision making process, when planning permissions are granted.

National policy and guidance are clear that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition, and must only be sought where they are necessary, directly related to, and both fairly and reasonably related in scale and kind to the development.

It is critical that Ipswich receives the infrastructure it needs to support the delivery of both housing and jobs growth, and to ensure that existing communities can be sustained. Growth should bring benefits to, and not adversely affect the quality of life of, existing communities.

Currently in Ipswich, developer contributions towards infrastructure provision come through Planning Obligations (S106 Agreements / Unilateral Undertakings) which cover on-and off-site requirements including affordable housing, open space provision, transport measures, education provision, and Habitats Regulations Assessment mitigation.

In 2010 the Government introduced the Community Infrastructure Levy (CIL) as a method of local authorities raising funds from developers for the provision of infrastructure. Ipswich Borough Council does not currently implement CIL.

Effective cooperation enables strategic policy-making authorities and infrastructure providers to establish whether additional strategic cross-boundary infrastructure is required. The statement is evidence that the strategic policy-making authorities have sought agreement with the relevant bodies.

Infrastructure Funding Statement

For the financial year 2019/2020 onward, any local authority that has received developer contributions (section 106 planning obligations or Community Infrastructure Levy) must publish online an infrastructure funding statement by 31 December 2020 and by 31 December each year thereafter.

This is still in preparation and is being prepared by the Operational Manager.

Relevant Local Infrastructure Plans & Strategies

Ipswich Borough Council Corporate Plan: Building a Better Ipswich Feb 2017

Ipswich Borough Council's top priorities include building quality and affordable homes for Ipswich people and bringing new jobs and investment to Ipswich. It includes priorities relating to providing new council housing and affordable homes; kick-starting the next development phase of the Waterfront; improving the quality of the town centre; supporting the health sector to meet community needs and ensuring Ipswich is a great place to experience a wide range of arts and entertainment.

Suffolk Local Transport Plan 2011-2031, Part 2 – Implementation Plan

This part of the Suffolk Local Transport Plan shows how the long-term transport strategy to support economic growth, reduce the environmental impact of transport and improve health outcomes could be implemented over the next 20 years. The implementation plan will be revised and updated over time in discussion with communities and businesses in Suffolk and other partner organisations, and to respond to changing circumstances.

This implementation plan identifies the strategic transport improvements that will support economic recovery and sustainable growth in Suffolk. The county council will directly promote some of these improvements. For rail, trunk road and developer led improvements it will be supporting the scheme promoters.

A key focus for Ipswich is:

- reducing the demand for car travel;
- managing roads to minimise delays to buses, giving cyclists clear passage through traffic jams and by making it easier for people to walk across roads; and
- Improving infrastructure - working with the commercial bus operators, to provide additional bus lanes and interchange points, and improve waiting facilities; improving walking and cycle routes – to improve traffic flow at peak hours.

The Suffolk Local Transport Plan is planned to be reviewed following receipt of additional government guidance.

New Anglia Local Enterprise Partnership - Economic Strategy for Norfolk and Suffolk 2017 Integrated Transport Strategy (May 2018)

The New Anglia Local Enterprise Partnership (NALEP) was established in 2011 along with 38 other local enterprise partnerships in England. The NALEP area covers both Suffolk and Norfolk. NALEP are focused on developing business sectors in this area to grow jobs in the region and remove barriers to business growth. The 'Economic Strategy for Norfolk and Suffolk 2017 Integrated Transport Strategy (May 2018)' sets out a strategy for growth and opportunity across the two counties and looks ahead to the 2040's. It seeks to:

- Improve strategic connectivity across the East and identifies Ipswich and the surrounding area as one of the 'priority places'

Ipswich Strategic Planning Authorities (ISPA) Statement of Common Ground

This outlines agreement on effective cooperation to address strategic infrastructure needs. Education, transport including modal shift and other matters are considered. Work is progressing well to establish funding mechanisms to address the impact of new development on the edge of Ipswich in terms of transport mitigation measures and a strategy has been produced by Suffolk County Council on behalf of the ISPA authorities to drive transport mitigation forward.

in particular the timely delivery of:

- a) A12 improvements;
- b) A14 improvements;
- c) Sustainable transport measures in Ipswich;
- d) Improved cycle and walking routes;
- e) Appropriate education provision to meet needs resulting from growth;
- f) Appropriate health and leisure provision to meet needs resulting from growth;
- g) Improvements to water supply, foul sewerage and sewage treatment capacity; and
- h) Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses

[Transforming Suffolk: Suffolk's Community Strategy 2008-2028, Suffolk Strategic Partnership](#)

This includes identifying the need for improved transport and the infrastructure to support sustainable economic growth; the need for technological or infrastructure improvements to address the impact of climate change; improved walking and cycling infrastructure; and a green infrastructure strategy is being developed for the Haven Gateway Growth Area, which sets out a vision for improved access in the Gateway to complement development and to protect sensitive wildlife areas.

['The Vision for Ipswich: East Anglia's Waterfront Town' \(July 2015\)](#)

In July 2015 a non-statutory document entitled 'The Vision for Ipswich: East Anglia's Waterfront Town' was published by partners –the University of Suffolk, New Anglia Local Enterprise Partnership, Suffolk County Council, Ipswich Central, Ipswich Borough Council, Ben Gummer MP and the Ipswich Chamber of Commerce. This Vision brings together the aspirations of the partners on a range of issues and identifies a series of actions for the next few years.

Growth Plans in the Local Plan

Housing Growth

The spatial strategy is for continued urban regeneration in central Ipswich. This continues a well-established approach that has seen a transformation of the Waterfront, and the beginnings of change to a more vibrant mixed-use area in the Portman Quarter (formerly Ipswich Village).

Alongside the focus on the central area, a sustainable urban extension is allocated on greenfield land at the Ipswich Garden Suburb and a cross-boundary allocation for future development for housing, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, is also identified in north-east Ipswich at the northern end of Humber Doucy Lane.

The Government's standard method for calculating the housing need using the 2014 based household projections resulted in an Ipswich objectively assessed housing need figure of 445 dwellings per annum from 2018 to 2036 dwellings. This is the housing requirement figure set out in the Final Draft Ipswich Local Plan published for consultation at Regulation 19 stage from 15th January to 2nd March 2020. The calculation included an adjustment in line with the standard method to respond to the 2018 ratio of median workplace earnings to median house prices (the affordability ratio), which were published on 28th March 2019.

On 19th March 2020, the Government published new 2019 affordability ratio data. This is also reflected in the ISPA Statement of Common Ground Table 1 below to which the final two columns have been added. It has the effect of raising the Ipswich housing need figure from 445 to 460 dwellings per annum over the plan period.

This had the overall impact of increasing the housing requirement over the plan period from 8,010 to 8,280 (a modest increase). (This represents Ipswich Borough's contribution to the delivery of at least 35,334 dwellings across the Ipswich Housing Market Area 2018-36).

Employment Growth

The Local Plan Review sets targets of at least 9,500 jobs through the provision of at least 23.2ha of employment land within Ipswich to contribute towards the Ipswich Functional Economic Area. The jobs target is evidenced by the East of England Forecasting Model (2017). The employment land requirement and strategic selection of sites is informed by the Ipswich Economic Area Employment Land Supply Assessment (2018). The spatial strategy to achieve this is broadly through encouraging office development in the town centre and other employment developments typically close to existing employment areas outside the town centre.

Transport Infrastructure

Suffolk County Council as the Highway Authority will consider the overall transport requirements of a development proposal and a transport assessment will be required for all significant developments.

The south of the Borough is bounded by the A14 which is controlled by the Highways Agency.

Policy CS5 seeks to enable better access by foot, bicycle or public transport. Other relevant policies are : CS20 (Key Transport Proposals), DM21 (Transport and Access in New Developments) and DM22 (Car and Cycle Parking in New Development).

The ISPA Statement of Common Ground – Iteration 6 reaffirms the contribution of up to £10 million towards the cost of a Wet Dock Crossing and this is reflected in Table 8a.

The Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area to achieve measures identified in Appendix B are broadly appropriate for managing the transport related impacts of additional growth in the Plan period, based on the transport evidence which underpins the Plan. Subject to further clarity on the delivery of the identified measures, the County Council envisages identifying modifications to the Plan through a Statement of Common Ground with the District Council. Ipswich Borough Council with Suffolk County Council is progressing this through the 'Infrastructure' Statement of Common Ground.

The focus of this strategy is mitigation within Ipswich as it addresses the cumulative impact of the ISPA local plans within the county town, this work will support the Local Transport Plan strategy for Ipswich. Mitigation outside of Ipswich will be addressed within each planning district through the Infrastructure Delivery Framework, recognising that good practices identified within the Ipswich focussed strategy could be effectively applied outside of this area.

Operation of suitable funding mechanisms to deliver mitigation arising from outside Ipswich is being developed through the ISPA officer working group, reporting to the main group.

Pedestrian and Cycling Infrastructure Needs

Suffolk County Council are leading meeting cycle and pedestrian infrastructure needs through the LCWIP which they are working to try to have ready for adoption in September 2020 to assist the Active Travel funding bid. The Ipswich Borough Cycling Strategy Supplementary Planning Guidance has been fed through to this wider Suffolk walking and cycling infrastructure planning.

The greatest infrastructure needs will be required for the two sustainable urban extensions of Ipswich Garden Suburb and the allocation north of Humber Doucy Lane where the needs for sustainable transport links will be the greatest.

Utilities

No major utilities infrastructure is identified, and the Council continues to work with utility providers.

In Ipswich, Anglian Water Assets (AWA) provides both sewage disposal and water provision. The Council has engaged with AWA through the publication of the Cross-Boundary Water Cycle Study (2019). The Study examined the existing infrastructure and assets of AWA and the capacity of these in relation to the forecast levels of growth of the Local Plan Review and the AWA Water Resources Management Plan (2019). The Study did not identify and new or upgraded assets were required to meet the anticipated levels of growth.

The Council has also consulted with UK Power Networks (UKPN). UKPN did not identify that any upgrades or new infrastructure relating to electricity are required to meet the forecast growth needs of the Local Plan Review. The Council continues to safeguard part of Site IP054b (Turret Lane) for a potential sub-station to serve demand from additional development in this area and at the Waterfront nearby. However, this is not needed at the present time and will continue to be monitored through future Local Plan Reviews.

Telecommunications and Broadband

No major telecommunications or broadband infrastructure is identified, and the Council continues to work with these providers.

Strategic Policy ISPA 2 (Strategic Infrastructure Priorities) commits the Council to working with partners to deliver key strategic infrastructure which includes the provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses. In addition, Policy CS17 (Delivering Infrastructure) lists ultrafast broadband and the opportunity for full fibre broadband to the premises (FTTP) as an infrastructure requirement.

In terms of development management policies, the Local Plan Review proposes to introduce a new policy DM34 (Delivery and Expansion of Digital Communications Network) to ensure that high quality and reliable communications infrastructure is delivered in all major developments. It requires that infrastructure is provided on an open access basis that will allow for the future provision of “ultrafast broadband”, “Full fibre” solutions or any other technology as and when they are made available. The policy also sets out support for next generation mobile technology (5g).

The Council will continue to evaluate telecommunications and broadband infrastructure through future Local Plan Reviews in consultation with these providers.

Flooding

The Council has engaged proactively and extensively with the Environment Agency regarding flood risk and infrastructure requirements needed to support the Local Plan Review. The Council has prepared a Strategic Flood Risk Assessment (SFRA) (2020) of the sites in the Local Plan Review in consultation with the Environment Agency.

The tidal flood barrier in the New Cut at the southern end of the Island Site was identified in the adopted Local Plan as an essential piece of infrastructure to manage flood risk and the growth identified in the Local Plan. This was installed in February 2019. As this is now completed there is no

longer a need to list it as a piece of infrastructure in Table 8A (Major Infrastructure Proposals) of the Local Plan Review.

With the completion of the tidal flood barrier there is not one single piece of major infrastructure that is needed to enable the Local Plan Review growth to be delivered. Instead, the delivery of the Ipswich Flood Defence Management Strategy is listed to help ensure the sustainable development of sites within the IP-One area which includes large areas of areas at high risk of flooding.

Policy CS18 (Strategic Flood Defence) states that the Council will continue to work with partners to implement the Ipswich Flood Defence Management Strategy as a key piece of infrastructure needed to support regeneration in Ipswich.

The development of sites identified through the Local Plan Review will be delivered in consultation with the Environment Agency through the development management process in their role as a statutory consultee. This will ensure that flood risk is appropriately managed on a case by case basis, taking the Ipswich Flood Defence Management Strategy and recommendations of the SFRA into account. Policy DM4 (Development and Flood Risk) will manage the delivery of any on-site infrastructure required to mitigate flood risk.

The consultants appointed for Ipswich SFRA work are currently updating their modelling to reflect the new Gipping model data. This will allow additional information on remediation if required.

Education

The Council has engaged with Suffolk County Council (SCC) and the Department for Education (DFE) to identify infrastructure requirements needed to support the Local Plan Review. Policy CS15 (Education Provision) highlights the strategy of the Local Plan Review to ensure appropriate education provision in the Borough. Policy CS17 (Delivering Infrastructure) also includes education provision as key infrastructure to support the Local Plan Review growth.

The Council has met and liaised with officers at SCC to explain the anticipated levels of growth forecast in each ward of the Borough. These discussions have taken place throughout the Local Plan Review process. This has allowed officers at SCC to determine which education facilities will require enhancement and/or new education facilities to accommodate the forecast levels of growth based on the respective catchment of the education facilities in relation to the sites proposed for development in the Local Plan Review. The result of this has been the establishment of education infrastructure that is necessary to support the Local Plan Review anticipated growth, set out in Table 8A.

The Council has also received consultation feedback throughout the Local Plan Review process from the DFE. Education infrastructure requested by the DFE has also been included in Table 8A.

The funding of education infrastructure is anticipated principally to be sourced from developer contributions. Appendix 1 of this document provides an indication of the likely costs associated with each piece of infrastructure on a per dwelling basis. Table 8A of the Local Plan Review highlights the cost of each infrastructure project as a total capital cost.

Healthcare

The Council has engaged with the Ipswich and East Suffolk Clinical Commissioning Group (CCG) and the East Suffolk and North Essex NHS Foundation Trust (ESNEFT) throughout the Local Plan Review process. Policy CS17 (Delivering Infrastructure) identifies GP surgeries and health centres as key

strategic infrastructure. In addition, Policy CS19 (Provision of Health Services) highlights the strategic approach to delivering healthcare provision in the Borough.

The only major item of healthcare infrastructure necessary to support the Local Plan Review is the provision of a new health centre at the former Took's Bakery Site (IP005). This site has been allocated for a health centre accordingly and the Council is currently engaging with the providers through pre-application discussions. The land has been reserved by the site owner (Ipswich Borough Council). The exact capital cost of this infrastructure has not been determined yet and the proportions of funding anticipated from public funding and developer contributions respectively has not been decided. This will continue to be reviewed as discussions evolve.

Planning permissions at the Ipswich Garden Suburb have secured contributions towards health care provision, and the NHS are consulted on all relevant applications to ensure any necessary provision is identified and factored into s106 discussions.

Other than this, the CCG has not identified any specific infrastructure improvements or additions to accommodate the level of growth forecast. Instead, healthcare infrastructure will be monitored as part of each application and any enhancements sought as part of the planning application process. The CCG has provided a template response (appendix 2) and likely developer contributions sought on schemes for over 50 dwellings. The likely costs required from this template are not considered to raise any viability issues in terms of delivery.

Emergency Services

Suffolk Constabulary have written in support of the Local Plan Review and have not requested that any specific major infrastructure proposals are identified. Suffolk Fire and Rescue Services have not raised any objection throughout the Local Plan Review process. These two consultees will continue to comment on planning applications as appropriate and may request any infrastructure improvements as needed to mitigate specific developments.

Emergency services are identified as one of the categories of infrastructure to be secured or financed from new developments in Policy CS17 (Delivering Infrastructure).

Community Facilities

Community Facilities are determined by the scale of development and in discussion with Suffolk County Council on a site by site basis.

Sport and Leisure Facilities

Ipswich Borough Council own all of the indoor sports provision to the public (excludes private clubs).

Other Open Space & Green Infrastructure

This is a prime matter for section 106 agreements and the Council has adopted appropriate SPD which outlines requirements. Appendix 3 and 4 outline how requirements are calculated. Officers have developed excel calculator for use in pre-application discussions to provide a baseline of requirements. The Open Space SPD (2017) also identifies deficiencies by ward which allows some negotiation in typologies where there is an identified need that needs to be addressed.

Waste Management

The Local Plan Review highlights two key infrastructure projects in relation to waste management that will be essential to supporting growth.

The relocation of the Portman's Walk Household Waste Recycling Centre (HWRC), as well as the concrete batching plant, is necessary to enable the delivery of the residential led allocation IP003. An alternative site will need to be agreed with Suffolk County Council and it is anticipated that the cost of this would be £3m.

The other project is the expansion of the Foxhall HWRC, which, although is within the boundary of East Suffolk Council, serves residents in Ipswich Borough. The anticipated cost of this project is £6m.

The capital costs for these projects will be covered by funding from Suffolk County Council and a developer contribution of £110 per dwelling.

Appendix 1: Approximate Cost Per Dwelling (July 2020) for Suffolk County Council Infrastructure Requirements

The below is an approximate estimation of costs on a per dwelling basis for the different infrastructure types that may be sought from developments. These costs are not fixed or in any way binding. They are provided solely to provide an approximate calculation for likely contributions required from new developments.

Infrastructure Type	Project Cost/Multiplier	Approximate Cost Per Dwelling (using Developers Guide methodology, but increased costs)
Early Education – Expansion	£17,268 per place	$£17,268 * 0.09 = \mathbf{£1,554 \text{ per dwelling}}$
Early Education – New Build	£20,508 per place	$£20,508 * 0.09 = \mathbf{£1,846 \text{ per dwelling}}$
Primary – Expansion	£17,268 per place	$£17,268 * 0.25 = \mathbf{£4,317 \text{ per dwelling}}$
Primary – New Build	£20,508 per place	$£20,508 * 0.25 = \mathbf{£5,127 \text{ per dwelling}}$
Secondary 11 – 16 – Expansion	£23,775 per place	$£23,775 * 0.18 = \mathbf{£4,280 \text{ per dwelling}}$
Secondary 11 – 16 – New Build	£24,929 per place	$£24,929 * 0.18 = \mathbf{£4,487 \text{ per dwelling.}}$
Secondary 16 – 18 Education - Expansion	£23,775 per place	$£23,775 * 0.04 = \mathbf{£951 \text{ per dwelling}}$
Secondary 16 – 18 Education – New Build	£24,929 per place	$£24,929 * 0.04 = \mathbf{£997 \text{ per dwelling}}$
Libraries	£90 per person	2.4 people per dwelling. $£90 * 2.4 = \mathbf{£216 \text{ per dwelling.}}$
Transport	Varies – need to consider generic/indicative site specific costs alongside strategic issues.	Varies.
Waste	Varies according to strategy at the particular HWRC	£110 per dwelling would be the highest figure we would currently envisage. Otherwise, £51 or £93 per dwelling.

Appendix 2: CCG calculations on healthcare provision for developments over 50 dwellings.


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Our Ref: **insert Ref**

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insert date

Dear Sirs,

Insert info

Dear Sir/Madam,

Insert Details:

1.0 Introduction

1.1 Thank you for consulting Ipswich and East Suffolk CCG on the above planning application.

1.2 I refer to the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of Ipswich and East Suffolk Clinical Commissioning Group (CCG).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development is likely to have an impact on the services of **No** main GP practices within the vicinity of the application site. The GP practices do not have capacity for the additional growth resulting from this development.
- 2.2 The proposed development will likely have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. Ipswich and East Suffolk CCG would therefore expect these impacts to be fully assessed and mitigated.

3.0 Review of Planning Application

3.1 Ipswich and East Suffolk CCG acknowledge that the planning application does include a Health Impact Assessment (HIA), however this does not appear to recognise that a capital contribution may be required to mitigate the primary healthcare impacts arising from the proposed development OR Ipswich and East Suffolk CCG acknowledges that the planning application includes a Planning Statement which suggests that a capital contribution may be required to mitigate against the healthcare impacts arising from the proposed development OR The planning application does not appear to include a Health Impact Assessment (HIA) or propose any mitigation of the healthcare impacts arising from the proposed development.

3.2 A Healthcare Impact Assessment (HIA) has been prepared by Ipswich and East Suffolk CCG to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

4.0 Assessment of Development Impact on Existing Healthcare Provision

4.1 The existing GP practices do not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately **No** residents and subsequently increase demand upon existing constrained services.

4.2 The primary healthcare service directly impacted by the proposed development and the current capacity position is shown in Table 1.

Table 1: Summary position for primary healthcare services within 2km catchment (or closest to) the proposed development

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Total				

Notes:

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
2. Current Net Internal Area occupied by the Practice
3. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO). Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
4. Based on existing weighted list size

4.3 The development would have an impact on the primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

5.0 Healthcare Needs Arising From the Proposed Development

5.1 At the earliest stage in the planning process it is recommended that work is undertaken with Ipswich and East Suffolk CCG and Public Health England to understand the current and future dental needs of the **development/new town** and surrounding areas giving consideration to the current dental provision, current oral health status of the area and predicted population growth to ensure that there is sufficient and appropriate dental services that are accessible to meet the needs of the **development/new town** but also address existing gaps and inequalities.

5.2 Encourage oral health preventative advice at every opportunity when planning a **development/new town**, ensuring that oral health is everybody's business, integrating this into the community and including this in the health hubs to encourage and enable residents to invest in their own oral healthcare at every stage of their life.

5.3 Health & Wellbeing Statement

As an Integrated Care System it is our ambition that every one of the one million people living in Suffolk and North East Essex is able to live as healthy a life as possible and has access to the help and treatment that they need in the right place, with good outcomes and experience of the care they receive.

Suffolk and North East Essex Integrated Care System, recognises and supports the role of planning to create healthy, inclusive communities and reduce health inequalities whilst supporting local strategies to improve health, social and cultural wellbeing for all aligned to the guidance in the NPPF section 91.

The way health and care is being delivered is evolving, partly due to advances in digital technology and workforce challenges. Infrastructure changes and funds received as a result of this development may incorporate not only extensions, refurbishments, reconfigurations or new buildings but will also look to address workforce issues, allow for future digital innovations and support initiatives that prevent poor health or improve health and wellbeing.

The NHS Long term plan requires a move to increase investment in the wider health and care system and support reducing health inequalities in the population. This includes investment in primary medical, community health services, the voluntary and community sector and services provided by local authorities so to boost out of hospital care and dissolve the historic divide between primary and community health services. As such, a move to health hubs incorporating health and wellbeing teams delivering a number of primary and secondary care services including mental health professionals, are being developed. The Acute hospitals will be focussing on providing specialist treatments and will need to expand these services to cope with additional growth. Any services which do not need to be delivered in an acute setting will look to be delivered in the community, closer to people's homes.

The health impact assessment (HIA) submitted with the planning application will be used to assess the application. This HIA will be cross-referenced with local health evidence/needs assessments and commissioners/providers own strategies so to ensure that the proposal impacts positively on health and wellbeing whilst any unintended consequences arising are suitably mitigated against.

5.4 The development would give rise to a need for improvements to capacity, in line with emerging STP estates strategy; by way of extension, refurbishment, reconfiguration or potential relocation for the benefit of the patients of **Name of surgery**; a proportion of the cost of which would need to be met by the developer.

5.5 Table 2 provides the Capital Cost Calculation of additional primary healthcare services arising from the

development proposal.

Table 2: Capital Cost calculation of additional primary healthcare services arising from the development proposal

Premises	Additional Population Growth ⁵	Additional floorspace required to meet growth (m ²) ⁶	Spare Capacity (NIA) ⁷	Capital required to create additional floor space (£) ⁸
Total				

Notes:

5. Calculated using the West Suffolk District average household size of 2.4 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number).
6. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO). Space requirement aligned to DH guidance within “Health Building Note 11-01: facilities for Primary and Community Care Services”
7. Existing capacity within premises as shown in Table 1
8. Based on standard m² cost multiplier for primary healthcare in the East Anglia Region from the BCIS Public Sector Q1 2020 price & cost Index, adjusted for professional fees, fit out and contingencies budget (£3,652/m²), rounded to nearest £100.

5.4 A developer contribution will be required to mitigate the impacts of this proposal. Ipswich and East Suffolk CCG calculates the level of contribution required, in this instance to be **£amount**. Payment should be made before the development commences.

5.5 Ipswich and East Suffolk CCG therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 planning obligation.

6.0 Conclusions

6.1 In its capacity as the healthcare provider, Ipswich and East Suffolk CCG has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.

6.2 The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.

6.3 Assuming the above is considered in conjunction with the current application process, Ipswich and East Suffolk CCG would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development’s sustainability if such impacts are not satisfactorily mitigated.

6.4 The terms set out above are those that Ipswich and East Suffolk CCG deem appropriate having regard to the formulated needs arising from the development.

6.5 Ipswich and East Suffolk CCG is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.

6.6 Ipswich and East Suffolk CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Appendix 3: Public Open Space costs (Public Open Space SPD August 2017¹).

COMMUTED SUM MAINTENANCE COSTS & NEW BUILD COSTS 2017 -- Revised uplifted figs. from SPD Standards / Local Plan

<u>Typology</u>	<u>FACILITY Example</u>	<u>Min. Threshold Size Sqm</u>	<u>2017 New Build Cost / Sqm</u>	<u>2017 Annual Main't Cost / Sqm</u>	<u>2017 Annual Main't Cost / Ha</u>	<u>2017 Annual Main't Cost per Person</u>	<u>2017 New Std: Sqm / person</u>
Parks & Garden Spaces - PGS	Formal Public Open Space / Ha	2,000	£8.18	£1.96	£19,600	£27.74	14.2
Natural & Semi-Natural - NSN	Informal Public Open Space / Ha	1,000	£6.54	£0.44	£4,400	£11.48	15.3
Amenity Green Spaces - AGS	Public Open Space / Ha	1,000	£5.68	£1.69	£16,900	£10.15	6
Children's Play Area - CP	LEAP	400	£196.20	£8.91	£89,100	£7.13	0.8
Children's Play Area - CP	NEAP	1000	£196.20	£8.91	£89,100	£7.13	0.8
Youth Play - YP	eg Muga - ball-play area	400	£189.66	£5.74	£57,400	£2.30	0.4
Allotments – ALL	e.g. plots with road access	6,480	£16.08	£0.42	£4,200	£1.69	4.1
Outdoor Sports Facility - OSF	e.g. Tennis Court	1000	£47.74	£2.49	£24,900	£35.38	14.2

Table Notes:

1. Costs are for general guidance only and may vary significantly depending on the circumstances of individual sites and proposed designs, which will be assessed on a case by case basis. The costs are based on an average cost for a typical facility.

¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/public_open_space_spd_22feb_2-updated_290817.pdf

Appendix 4: Open Space Typology & Cost Calculator – Worked Example

Number of dwellings

15

Average household size

2.4

Note: To calculate average household size, you need to look at the proposed development density of the site. General site development will assume an average household size of 2.4 persons per dwelling, except where there is a high density of development proposed - defined as at or above 90 dwellings per hectare (dph) where an average household size of 1.9 persons per dwelling is assumed. The starting point for Policy is the 2017 Local Plan - In particular Policies DM10, DM28 & DM29. Other relevant Council strategy produced by Parks & Cemeteries have been added to the categories or 'typologies' (links to these docs is included in the Useful Resources Appendix to the Open Space SPD). Other SPD of relevance is : Ipswich Urban Character SPD, Space and Design Guidelines SPD & the Development & Flood Risk SPD.

Anticipated population

36

Category	SQ M per 100 0 pe	Requir ement (SQM)	Mini mum Spac e Stan dard	Onsite Provisi on / Off Site Contri bution	Build Cost Per SQM (1) (2)	Indicative Cost Associated with Development Need
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	op e		(SQ M)			
Category A - Parks & Gardens	116 00	417.6	2000	Contri bution	£ 7.50	£ 3,132.00
Category B - Amenity Green Space	480 0	172.8	1000	Contri bution	£ 5.21	£ 900.29
Category C- Natural and Semi-Natural Green Space - Open Space and Biodiversity Policy 213-2023	153 00	550.8	1000	Contri bution	£ 6.00	£ 3,304.80
Category D - Outdoor Sports Facilities (with natural or artificial surfaces)	142 00	511.2	1000	Contri bution	£ 43.80	£ 22,390.56
Category E - Provision for Children	800	28.8	400	Contri bution	£ 180.00	£ 5,184.00
Category F -Provision for Young People - see the Equipped Play Strategy 2014-2021	400	14.4	400	Contri bution	£ 174.00	£ 2,505.60
Category G- Allotments - see the Allotments Strategy 2014-2020	410 0	147.6	6480	Contri bution	£ 14.75	£ 2,177.10
					Total	£ 39,594.35
					Per Dwelling Equivalent	£ 2,639.62

Notes

(1) Build cost excludes ongoing maintenance costs.

(2) Build costs are indicative only and reflect 2015 figures, these will be uplifted every financial year

(3) The total provision identified is the starting point for Section 106 negotiation. Where the development site is located where there is a surplus of a typology for example in reasonable proximity to the site, then a contribution may not be required for that typology. Nursing homes and elderly persons accommodation will not be subject to children's and young people's provision . In addition, replacement dwellings will not be required to contribute to public open space. On small high density infill developments of 15 - 40 dwellings, the requirement of 15% on-site open space will be applied flexibly where it can be demonstrated that compliance will reduce the number of dwellings. Open Spaces should also be within the accessibility standards as set out In App 6 to the Core Strategy

(4) Outdoor and indoor sports provision will be guided by the Ipswich Playing Pitch Strategy (not yet adopted)

(5) At least some provision will be expected on site as part of the 10% on site requirement, most likely amenity open space and/or natural and semi-natural open space

*****PLEASE NOTE CONTRIBUTIONS WILL NOT BE SOUGHT IN CATEGORIES / AREAS OF EXISTING OVER PROVISION*****