

Ipswich Borough Council Local Plan Review 2018 – 2036

Response to Matter 2 – Spatial Strategy

Issue: Whether the spatial strategy of the ILPR has been positively prepared, is justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will enable the delivery of sustainable development in accordance with national policy?

November 2020



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14. Does the spatial strategy in the ILPR enable Ipswich to fulfil its strategic role in the growth and sustainable development of the ISPA, with particular reference to the Objectives and Policies ISPA1-4 and CS2 of the CSP?

The Strategic Housing Market Assessment (CDL D16¹) (2019) identified significant demand for three plus bedroomed housing in the Borough to 2036 (paras 4.14 – 4.17).

Because Ipswich's boundary is tightly drawn, larger forms of housing are best accommodated in sustainable edge locations. Policies ISPA 1-4 ensure that the necessary sustainable social and transport infrastructure will be provided to meet these suburban needs.

15. Is Policy CS1 necessary and does it serve a clear purpose or does it duplicate the policies in the NPPF on sustainable development and decision-making? Is the policy consistent with the objectives and presumption in favour of sustainable development set out in paragraphs 8 and 11 of the NPPF?

Policy CS1 identifies sustainable development at the heart of plan making, similar to the NPPF, and that planning applications that accord should be approved without delay. However, it also includes the Council's comprehensive approach to climate change, as referenced throughout the plan, rather than in a single climate change policy.

16. Is the spatial strategy for the location and nature of development in Ipswich, set out in Policy CS2, justified as the most appropriate strategy for the sustainable development of Ipswich, when considered against the reasonable alternatives? What alternative strategies were considered by the Council in terms of the options for the spatial distribution of development and why were these rejected?

The Sustainability Appraisal (SA) report (2019) (CDL A4²) and addendum (2020) (CDL I28³) collectively assessed four strategic spatial options:

- The preferred option (Policy CS2);
- Higher-density urban regeneration (option 1);
- Increased development beyond the Borough (option 2); and
- Changing the use of existing land in the Borough to housing (option 3).

Table 3.1 of the SA addendum scores each of the options against the 19 SA objectives. The preferred option (Policy CS2) offers the most sustainable way to accommodate growth for the reasons explained in Chapter 3.3 of the addendum.

¹

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/strategic_housing_market_assessment_part_2_update_january_2019_-_final.pdf

² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf

³ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i28_-_sa_adendum_spatial_strategy_assessment_october_2020.pdf

The SA report (Table 3.10) outlines reasons for rejecting the alternatives. Spatial option 1 was rejected because the preferred option performed better in its predicted effects.

17. Is the reliance on two large scale developments at Ipswich Garden Suburb and Humber Doucy Lane to deliver half of the housing requirement for Ipswich, justified as the most appropriate way of achieving sustainable development, the supply of new homes and the growth of the city? If not, what are the alternatives?

The delivery of the two developments forms part of the preferred spatial option identified through the SA addendum (CDL 128). This option scored positively compared to the reasonable alternatives. The Borough is tightly drawn, and the delivery of these strategic sites is necessary to help meet the objectively assessed housing need.

Two of the three land parcels at Ipswich Garden Suburb (IGS) have outline planning permission and the Council has successfully bid for Housing Infrastructure Fund (HIF) funding. A Delivery Board is in place to monitor, co-ordinate and assist the delivery of the wider strategic site.

The Humber Doucy Lane (HDL) site is planned jointly with East Suffolk Council and the adjacent land is allocated in the adopted Suffolk Coastal Local Plan (2020). The HDL landowner has engaged positively throughout the ILPR process.

In terms of where housing should go, the Council originally examined three options (see question 16) The SA Officer summary report (Appendix 3 - Executive Report on Issues and Options⁴) explains how alternative growth and spatial scenarios for jobs and homes have been tested.

As a result of this exercise, a hybrid approach to the scenarios (Policy CS2) was adopted focussing on urban regeneration where possible and ensuring that any Ipswich edge development is sustainably located.

18. Is the approach to densities set out in Policy CS2 justified and effective? Does the ILPR make it clear what is meant by high, medium and low development densities in terms of non-residential uses across the Borough? Do the changes to Policy CS2 proposed in the Schedule of Proposed MMs provide adequate clarity?

NPPF Paragraph 123 requires that where an existing or anticipated shortage of housing land exists, optimal use of each site is crucial. Density standards are proposed to reflect the accessibility and potential of different areas. The minimum density standards do not apply to non-residential uses. A modification to Policy CS2 is proposed to clarify this (modification 2.2).

⁴ <https://democracy.ipswich.gov.uk/documents/g2100/Public%20reports%20pack%2027th-Nov-2018%2018.00%20Executive.pdf?T=10>

The cross-reference to DM31 proposed in the schedule of MMs (CDL I31) (MM19) does provide adequate clarity.

19. Does the spatial strategy of the ILPR comply with national policy on planning and flood risk? In particular:

a) Has it been informed by a strategic flood risk assessment (SFRA), based on the most up to date flood risk data and climate change allowances, and taking account of the advice of the Environment Agency?

The ILPR has been informed by an updated SFRA reflecting the latest climate change allowances (CDL I34⁵). Iteration 2 of the Council's Statement of Common Ground (SoCG) with the Environment Agency (EA) (CDL I35⁶) confirms that the EA considers the ILPR to be sound.

b) Should the boundaries of Flood Risk Zones 2 and 3, as shown on Plan 2, be added to the Policies Map to provide clarity on development constraints within allocated sites and opportunity areas?

The boundaries of Flood Risk Zones 2 and 3 have been shown on Plan 2 to avoid potential overlap with other allocations or designations on the policies maps. Applicants should check site detail using the site proformas (SFRA Appendix F). Policy SP2 identifies site constraints including flood risk under a main modification proposed (CDL I31⁷).

c) Should Plan 2 be modified to make clear that it relates to fluvial and tidal flooding and that the boundaries to the zones are indicative, but that EA Flood Maps provide the definitive record for determining whether a site lies within Zones 2 and 3?

A modification is proposed to the key of Plan 2 (modification 2.6).

d) Given that the number of housing allocations which are located in Flood Risk Zones 2 and 3, does the ILPR meet the requirements of the sequential test, as set out in the NPPF, in avoiding inappropriate development in the areas at highest risk of flooding and steering new development to areas with the lowest risk of flooding?

A sequential and exception assessment has been carried out to inform site allocations and ensure that they are NPPF-compliant (CDL I34.1⁸).

e) Should sites at less risk of flooding, including those outside of the Borough, be preferred for the development of more vulnerable uses, such as housing?

⁵ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i34_-_sfra_main_report_2020-10-08.pdf

⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i35_-_ibc_environment_agency_socg2_8th_oct_ea_ibc_signed.pdf

⁷ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_-_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf

⁸ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i34.1_-_sequential_and_exception_test_statement_2020-10-07.pdf

The NPPF requires plans to apply a sequential, risk-based approach to development locations (Paragraph 157) as followed by the Council (CDL I34.1⁹). Where sites within Flood Zones 2 and 3 have been allocated, the exception test has been satisfied (CDL I34.1 and CDL I34¹⁰ Chapter 8).

f) If it is not possible for development to be located in zones at lower risk of flooding, either within or outside of the Borough, do the policies of the ILPR effectively apply the exception test, as set out in paragraphs 160 and 161 of the NPPF, to ensure that development would be safe for its lifetime and that the wider sustainability benefits would outweigh the flood risks?

Policy DM4, supported by the Development and Flood Risk Supplementary Planning Document (SPD) (CDL G3¹¹) sets the framework to ensure development is safe. The SPD is being reviewed in light of the updated SFRA. The Sequential and Exception Test Report (CDL I34.1) considers the sustainability benefits of allocations within Flood Zones 2 and 3. A modification (2.4) is proposed to Policy DM4 criterion (e) to include wider sustainability benefits.

g) Are the criteria in Policy DM4 sufficiently comprehensive in identifying the type and design of development, which will be acceptable in areas susceptible to different forms of flooding, including surface water flooding? Will it be evident how a decision maker should react to development proposals within such areas?

Policy DM4 criteria refer to all forms of flooding and are supported by the SFRA detailed mapping and guidance (e.g. on floor levels). A modification (2.4) is proposed to include reference to design. The policy is supported by the Development and Flood Risk SPD. Therefore, it is clear how applications will be determined. Modifications have been suggested (CDL I31¹², MM41 to MM44).

h) Is Policy CS18 effective in helping to secure further strategic flood defence infrastructure to support the regeneration of the city and is it evident how a decision maker should apply it to development proposals?

Policy CS18 recognises the importance of flood defences for central Ipswich. It has proved effective to date in helping to secure infrastructure delivery. Although the barrier is now operational, there are potential future requirements, such as a pumping station, which may become important later in the plan period as part of the EA 10 year review.

20. Is the spatial strategy and location of growth in the ILPR justified and consistent with national policy, in respect of the modelling of its effects on the operation of the highway

⁹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i34.1_-_sequential_and_exception_test_statement_2020-10-07.pdf

¹⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i34_-_sfra_main_report_2020-10-08.pdf

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https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/development_and_flood_risk_spd_jan_16_0.pdf

¹² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_-_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf

network and its potential to minimise the need to travel and maximise journeys by sustainable modes of transport?

The spatial strategy reflects the national requirement for plans to positively seek opportunities to meet development needs. Policy CS2 sets this out through urban regeneration and the sustainable growth of Ipswich. The NPPF requires that potential development impact on transport networks be addressed. The ILPR proposals are modelled for their impact on the highway network, together with the cumulative impacts of combined growth across the Ipswich Strategic Planning Area (ISPA). The modelling and key findings are described in the Transport Topic Paper (CDL I7¹³).

The 'Run 7' modelling (CDL D35-D35.2¹⁴) includes scenario testing on the impact of the SCC ISPA Transport Mitigation Strategy (CDL D39¹⁵). Impacts on the highway network at 2026 and 2036 are addressed, to tie in with the end of Highways England's Roads Investment Strategy 2 (RIS2) period and provide a meaningful period for the assessment of the impact of the ISPA mitigation strategy on demand management. The Transport Topic Paper reports on the transport modelling conclusion that Ipswich benefits most from the ISPA demand adjustments, which are incorporated into Policy CS20. However, some locations are over or close to capacity in 2026 and 2036. In these locations, additional measures to help mitigate any impact will need to be considered in the context of relevant planning applications.

The SoCG with SCC (CDL I17¹⁶) sets out proposed modifications to transport policies to provide clarity on sustainable travel measures. The SoCG with Highways England and SCC regarding the strategic road network (CDL I18¹⁷) sets out measures for resolving identified link and junction capacity problems arising from growth.

21. What evidence is there to demonstrate that the combination of transport measures identified in Policies ISPA2 and CS20 and Tables 8A and 8B of the CSP would be effective in mitigating the traffic impacts of planned growth in Ipswich and that the necessary funding is confirmed to ensure their delivery within the plan period?

Transport modelling demonstrates the capacity of transport measures identified through policies ISPA2 and CS20, and Tables 8A and 8B, to mitigate the traffic impacts of planned

¹³ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i7_-_air_quality_transport_green_infrastructure_topic_paper_and_2020_addendum_final.pdf

¹⁴ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d35_-_wsp_transport_modelling_methodology_report_jan_2020.pdf
https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/all_appendices_-_mr7_methodology_report.pdf
https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/final_ispa_mr7_scc_hwy_results_report.pdf

¹⁵ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019-08.ispa_mitigation_strategy.pdf

¹⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i17_-_scc_socg_transpt._pkg_final_24.9.20_jc_mf_0.pdf

¹⁷ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i18_-_statement_of_common_ground_highways_england_final_signed_300920_0.pdf

growth in Ipswich. Model Run 7 (CDL D35.2¹⁸) tested the 'ISPA Transport Mitigation Strategy' and evidenced it was particularly effective for reducing impacts on Ipswich. ISPA2 and Table 8A also refer to the strategic road network of the A14.

The ISPA Local Plan Modelling Strategic Road Network Technical Note (CDL D38¹⁹) models the effects of junction improvements on the A14.

The SoCG with Highways England and SCC (I18²⁰) itemises how improvements will be taken forward and funded.

22. Is Policy CS20 justified and effective in respect of the Key Transport Proposals?

The traffic modelling (CDL D35.2) identifies the positive impact of the ISPA Transport Mitigation Strategy on the Ipswich road network. Policy CS20 and supporting text identify how delivery will be taken forward including cost apportionment across the ISPA authorities.

Policy CS20 supports the principle of a Wet Dock Crossing. SCC has reserved up to £10.8m to help secure it or something similar (A21²¹). The SoCG with SCC as Highway Authority addresses access to the Island site in Appendix 4. This identifies that the additional access needed may be vehicular or for cyclists and pedestrians.

A modification is proposed to paragraph 8.247 (modification 2.3).

23. Given the Council's agreement, in the SsoCG with East Suffolk and Babergh and Mid Suffolk Councils, to modify Policy ISPA2 and the supporting text to Policy CS20 to remove reference to the Ipswich Northern Route, is it appropriate for paragraph 8.19 of the supporting text to Policy ISPA2 to continue to support a Northern Route to enable longer term growth within the strategic planning area?

Reference to the Ipswich Northern Route made in 8.19 should be deleted (modification 2.1). Any future needs can be addressed through the next iteration of the ILPR. Following the SCC option consultation for a northern route in 2019, authorities did not show universal support. SCC Cabinet decided, in January 2020, not to develop the scheme beyond an outline business case (CDL A21²²).

¹⁸ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/final_ispa_mr7_scc_hwy_results_report.pdf

¹⁹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d38_-_ispa_strategic_road_network_technical_note_august_2019.pdf

²⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i18_-_statement_of_common_ground_highways_england_final_signed_300920_0.pdf

²¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a21_-_ispa_statement_of_common_ground_-_v6_june_2020_final.pdf

²² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a21_-_ispa_statement_of_common_ground_-_v6_june_2020_final.pdf

24. Is the spatial strategy and location of growth in the ILPR justified and consistent with national policy in respect of its consideration of the impact of development proposals on the air quality in Ipswich?

The SA Addendum (June 2020) (CDL A5)²³ assessed site allocations against SA Objective 7 (air quality) presented in the published SA Report. The assessments were found to remain accurate in light of the detailed Air Quality Assessment Report (CDL D33²⁴) results.

The air quality impacts of the ILPR proposals has been assessed through air quality modelling (CDL D33²⁵). The Topic Paper on Air Quality (CDL I7²⁶) describes the methodology used and key findings. The modelling considered the effects of the ILPR with and without transport mitigation as set out in the SCC Transport Mitigation Strategy for the ISPA. The modelling compared a 2017 baseline with 2026 and 2036 concentrations of pollutants.

The biggest positive influence on air quality over the plan period is likely from national measures to pursue cleaner vehicles. The modelling illustrates that, with transport mitigation in place, most human receptors would experience negligible impacts on annual mean NO₂ concentrations with ILPR proposals in 2026 and 2036. Where impacts would be notable, in 2026 they are mainly beneficial impacts due to concentration reductions.

By 2036 there would be some adverse impacts, which are limited to AQMA No.2. The Halberd Inn is the only location to experience exceedances of the air quality standards. This will be investigated further by reviewing diffusion tube locations for the next monitoring period, with a view to locating a tube to establish the baseline. This will provide data for discussion with the Highway Authority. The overall report conclusion is that future levels of air pollutants would generally be lower than present, with NO₂ levels predicted to be substantially lower.

Policy CS20 sets out support for the ISPA transport mitigation measures, which the modelling indicates contribute to reduced pollutant levels. Policy DM3 sets out air quality requirements for developments. The policy links to the Air Quality Action Plan (2019) (AQAP) (CDL G39²⁷) and the Low Emissions SPD, which the Council's Executive approved in October 2020 as a draft for public consultation (CDL I36²⁸).

²³ <https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a5-ipswich-local-plan-2018-36-sustainability-appraisal-addendum-air-qual-flood-risk.pdf>

²⁴ <https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d33-ipswich-local-plan-review-aqa-vol-1-report-final.pdf>

²⁵ <https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d33-ipswich-local-plan-review-aqa-vol-1-report-final.pdf>

²⁶ <https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i7-air-quality-transport-green-infrastructure-topic-paper-and-2020-addendum-final.pdf>

²⁷ <https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/air-quality-action-plan-2019-executive-approved-pdf-version.pdf>

²⁸ <https://democracy.ipswich.gov.uk/documents/s28788/E-20-19%20Appendix%201%20-%20Draft%20Low%20Emissions%20SPD.pdf>

25. Does the ILPR contribute towards compliance with limit values and national objectives for pollutants and take opportunities to improve air quality or mitigate impacts of development on air quality? If so, how?

The Air Quality Modelling Report concludes that in the 2017 base year, most modelled exceedances of the annual mean NO₂ Air Quality Standard (AQS) of 40µg/m³ occur at human receptors within the existing AQMAs. The highest modelled annual mean NO₂ concentration occurs at 'The Halberd Inn'. Elsewhere within the study area, annual mean NO₂ concentrations were well below the AQS.

The Report concludes that 'Future levels of air pollutants would generally be lower than present, in particular concentrations of NO₂, are predicted to be substantially lower - primarily due to government targeted measures to tackle roadside exceedances of the EU limit value for this pollutant.'

The Report identifies one location with 'notable adverse impact' on air quality at 2036 (see response to Q24).

The overall report conclusion is that future levels of air pollutants would generally be lower than present, with NO₂ levels predicted to be substantially lower. Therefore, the ILPR contributes positively towards compliance with limit values through pursuing a strategy which helps to deliver modelled air quality improvements.

The most directly relevant policies of the ILPR are Policies CS20, DM3 and DM21. CS20 sets out support for the ISPA transport mitigation measures, which the modelling indicates will contribute to reduced levels of pollutants. DM21 prioritises sustainable travel choices and electric vehicle charging point provision. DM3 includes requirements for developments to reduce negative impact and mitigate impacts on air quality. The policy and supporting text refer to the AQAP, published in 2019. The ILPA and the AQAP help create a holistic approach to improving air quality - the ILPR through requiring appropriate measures for new development and AQAP through actions extending beyond land use planning, such as public information campaigns supporting sustainable travel. The draft Low Emissions SPD was approved in October 2020 for public consultation (CDL I36).

26. Objective 5 of the Local Plan, in chapter 6 of the CSP, states that 'every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels'. How does the ILPR seek to achieve this?

In addition to the issue of air quality addressed in the response to question 24, many other ILPR policies are also relevant to achieving carbon reduction - a theme running through the plan. Policies range from those guiding the location and accessibility of development (CS2 and CS5); transport considerations for developments including electric vehicle charging point provision (DM21); and energy use in developments (DM1 and DM2).

The Annual Monitoring Report 2018-2019 (CDL E1²⁹) suggests that between 2005-2017, CO2 emissions in Ipswich reduced by 47.4% to 3.0 tonnes per capita. If projected forward to 2025, these figures indicate that the target for CO2 emissions will be met. The policies in the ILPR will ensure that this progress continues.

27. Is the strategic balance between development and the protection of the natural environment and heritage assets provided for through Policies ISPA3 and CS4 appropriate and justified?

The ILPR seeks to protect and enhance the natural environment and heritage assets. ISPA3 sets out the Council's commitment to working with other local authorities 'to address the requirements of the Recreational Avoidance and Mitigation Strategy' (RAMS) (CDL G7³⁰). The RAMS seeks to ensure compliance with the Habitats Regulations 2017 (as amended) by avoiding and mitigating adverse effects on the integrity of European protected sites, arising from new residential development.

Policy CS4 strengthens the protection of the natural environment and highlights the Council's commitment 'to conserving and enhancing the Borough's built, heritage, natural and geological assets.' The Policy sets out measures to ensure protection of the historic and natural environment.

The policies, when read in the context of other ILPR policies, strike an appropriate balance between development and protection of the natural and historic environment.

28. Is the proposed Minor change to Policy CS4 to correct the terminology for the Draft South-East Inshore Marine Plan and East Inshore Marine Plan and East Offshore Marine Plan necessary?

It is important and necessary for the ILPR to contain the correct terminology, as requested by the Marine Management Organisation.

29. Does objective 10 require modification to reflect the need to improve existing infrastructure as well as provide new infrastructure to meet increased demand from growth?

The objective requires modification as suggested (modification 2.5).

30. Is the ILPR effective in the provision of infrastructure and local services to meet future development needs? In particular:

a) Are the strategic infrastructure priorities and schemes identified in Policy ISPA2, Policy CS17 and Table 8A comprehensive and up to date, sufficient and justified as necessary to support the development needs of the plan, and deliverable over the Plan period?

²⁹ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/e1 - authority monitoring report 2018-2019_0.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/e1_-_authority_monitoring_report_2018-2019_0.pdf)

³⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/suffolk_rams_spd_technical_report.pdf

The ILPR is effective in relation to the provision of infrastructure and local services to meet future needs. The Council has engaged with infrastructure providers in preparing the infrastructure policies and evidence to support the ILPR. SsoCG with key infrastructure providers have ensured that accurate strategic infrastructure priorities are in the ILPR.

b) Are there any types of infrastructure or schemes which may be required to support future needs missing?

Policy CS17 and Tables 8A and 8B identify the infrastructure needed to support the ILPR growth.

c) Would the ILPR provide improved infrastructure and services to promote sustainable growth?

CS17 and projects in Tables 8A and 8B provide improved infrastructure and services which promote sustainable growth.

31. Is the list of strategic and neighbourhood infrastructure requirements for the IGS in Table 8B complete?

The list in Table 8B is complete.

32. Is the requirement in Policy CS19 to locate additional, new, extended or relocated local health facilities in or adjacent to the town, district or local centres justified, effective and consistent with national policy? Is the policy justified and unambiguous in requiring applicants to demonstrate 'to the Council's satisfaction' that new local health facilities not in town, district or local centres would be fully accessible?

NPPF Paragraph 92(e) states that planning policies should ensure an integrated approach to the locating housing, economic uses and community facilities and services. Paragraph 103 states that significant development should focus on locations which are or can be made sustainable. Paragraph 104 states that planning policies should support an appropriate mix of uses across an area to minimise the number and length of journeys. Focussing new, extended or relocated local health facilities in these locations is effective and consistent with the NPPF.

The requirement is necessary to ensure that developments in these locations would not compromise the vision and objectives of the ILPR. The means of demonstrating compliance is considered to be clear. It would be inappropriate to prescribe specific requirements to meet this, as local health facilities can vary significantly in terms of their catchment, size and type.

33. Does the evidence on viability and infrastructure demonstrate that the proposed development strategy of the ILPR, which relies heavily on brownfield site allocations, can viably deliver the housing, commercial floorspace and infrastructure required to support the growth proposed?

The Whole Plan Viability Assessment (CDL D42³¹) broadly demonstrates that house-led developments are viable with infrastructure contributions, with the exception of brownfield

³¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf

sites in the lower value zone. However, flat-led developments are more challenging, particularly on brownfield sites. Excluding convenience retail, non-residential developments are unviable. The policy costs of the ILPR have been factored into the viability assessment but are not a barrier to development as the financial impact of these on the overall viability is insignificant compared to the wider market influences which make viability challenging.

The varying nature of viability across the Borough needs a flexible approach to seek contributions, including the 15% affordable housing requirement. These will be secured through Section 106 obligations through Policies CS12 and CS17. The essential infrastructure projects listed in Table 8A have been fully evidenced and are deliverable.

34. Is there capacity in the local housing market and housebuilding industry to support the scale and rate of housing growth committed and planned, especially at the SUEs?

The Council has prepared a Housing Delivery Action Plan (CDL D19³²) to address historic rates of under delivery. This is monitored and reported on annually. The 2020 report³³ included a questionnaire of developers/ housebuilders on likely impacts of Covid-19 on housing delivery. This was undertaken early into the pandemic and until a 'new normal' is established the long-term effects cannot be determined.

For the IGS, a Delivery Board, as detailed in the IGS SPD (2017), has been established to monitor, co-ordinate and assist in the site delivery.

The first neighbourhood where completions are expected is the Henley Gate neighbourhood. Four reserved matters applications, and conditions discharge applications have been submitted for this area.

For the Fonnereau neighbourhood, the next stage will be the submission of the first reserved matters application and applications to discharge planning conditions. The outline permission includes time limitations for submission of reserved matters and commencement of development.

The third neighbourhood is Red House. A SoCG (CDL I19³⁴) has been agreed with Mersea Homes identifying a late 2022/ early 2023 commencement on the site.

The delivery of strategic infrastructure at IGS, specifically the country park and two bridges, is linked to the HIF funding (£9.8m), requiring implementation by March 2022, incentivising timely delivery.

³² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/draft_housing_delivery_action_plan.pdf

³³ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/hdap_monitoring_report_2020_-_final.pdf

³⁴ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i19_-_mersea_homes_socg_red_house_neighbourhood_final_socg_29_09_2019_signed_0.pdf

The HDL landowner has written in support of the proposed allocation ISPA4.1, specifically requesting that references to “future development” be removed to potentially allow for the site to be delivered sooner than anticipated.

Regarding Council housing delivery within Ipswich, a New Build Programme for 1,000 Homes was established to ensure a stable and long-term housing supply.

Conclusion

The spatial strategy has been positively prepared and is justified as the most appropriate strategy. It enables the delivery of sustainable development.

Modifications are proposed where appropriate to address Matters raised.

Please note - Word Count 2981 (This excludes cover, themes, footnotes, questions, sub-headings and mods table.)

Suggested Modifications

Modification No.	Page of Final Draft Local Plan Review	Policy/ Paragraph of Final Draft Local Plan Review	Main Modification	Reason
2.1	40	Paragraph 8.19	<p>Modification to Paragraph 8.19:</p> <p>In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a <u>A</u> northern route around Ipswich to assist is expected to be needed to enable growth in the longer term, <u>remains an ambition of the Borough for the future.</u> The route would improve connectivity between the A14 and A12, reducing pressure on the A14 and improving network resilience, especially near the Orwell Bridge and Copdock interchange. Suffolk County Council consulted on Ipswich Northern Route Options between July to September 2019, which assessed three indicative broad routes. Ipswich Borough Council resolved at the Executive Committee meeting of 3 September 2019 to indicate a general support to the project from the Borough Council and to suggest a strong preference for the inner route. <u>This support remains.</u> The Council fully supports the ongoing work of Suffolk County Council in considering potential options for routes, and it is expected that the next review of the Ipswich Local Plan (along with other Local Plans in the Ipswich Strategic Planning Area) will consider the implications of any decisions made about routes in more detail, including the extent to which the options might support potential future scenarios for housing and employment growth beyond that which is being planned for within this Local Plan.</p>	In response to question 23 of the MIQs.
2.2	49	CS2	<p>Modification to Policy CS2:</p> <p>In the interests of maximising the use of previously developed land, <u>residential</u> development</p>	In response to question 18 of the MIQs.

			densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise heritage assets and the historic character of Ipswich.	
2.3	105	Paragraph 8.247	<p>Modification to Paragraph 8.247:</p> <p>At a minimum, a road bridge from the west bank to the island site and a pedestrian and cycle bridge across the Wet Dock lock gates to the east bank will be required to enable any significant development on the island. <u>The requirement for these to be bridges for motor vehicles or for sustainable travel will be determined when the site comes forward taking into account the detail of the development application and the extent of modal shift across the town.</u></p>	In response to question 22 of the MIQs.
2.4	113	Policy DM4	<p>Modification to Policy DM4 (Criteria A & E):</p> <p>Development will only be approved where it can be demonstrated that the proposal satisfies all the following criteria:</p> <p>a. it does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout, <u>design</u> and form of the development <u>to mitigate flood risk</u> and appropriate application of Sustainable Drainage Systems (SuDS);</p> <p>b. that no surface water connections are made to the foul system and connections to the combined or surface water system is only made in exceptional circumstances where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments);</p> <p>c. that adequate sewage treatment capacity and foul drainage already exists or can be provided in time to serve the development;</p>	In response to question 19(e & g) of the MIQs.

			<p>d. it will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy;</p> <p>e. it is and will remain safe for people for the lifetime of the development; and <u>the sustainability benefits would outweigh flood risk</u>;</p> <p>f. it includes water efficiency measures such as water re-use, stormwater or rainwater harvesting, or use of local land drainage water where practicable; and</p> <p>g. It does not have any adverse effect on European and Nationally designated sites in terms of surface water disposal.</p>	
2.5	210	Objective 10	<p>Modification to Objective 10:</p> <p>To retain, <u>improve</u> and provide high quality and sustainable education schools, health facilities, and sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the local demand.</p>	In response to question 29 of the MIQs.
2.6	N/A	Plan 2	<p>Modification to Plan 2:</p> <p>This plan of nationally designated flood zones relates to fluvial <u>and tidal flooding and is based indicatively on mapped data from the Environment Agency.</u></p>	In response to question 19 (c) of the MIQs.