

Matter 5 – Retail Development and Centres **Not attending**

Issue: Has the ILPR been positively prepared and is it justified, effective and consistent with national policy in respect of its strategy and policies for retail and other town centre development in Ipswich for the period 2018-2036?

Representations 26514, 26513

71. Do the Plan's policies for retail and town centre development offer sufficient flexibility to respond to future changes to the retail and service sector in Ipswich which may result from the economic effects of the COVID-19 pandemic? Are any modifications required to address this?

The Addendum to the Retail and town centre topic paper references the Retail Position Update Statement – August 2019 which identified the comparison need for the Borough of 9,900sq m and states that "The Local Plan Review has allocated sufficient land for 10,550sq m net comparison floorspace (see table 137)" i.e. an over-allocation. The growth of internet shopping has accelerated massively since August 2019 at the expense of conventional shopping resulting in an increase in empty units, even without the effect of Covid-19. The evidence base for Retail demand is out of date and therefore the Core Strategy is unsound with respect to Retail land allocation. In our opinion, the comparison need will have decreased further, resulting in greater excess of land allocated for retail. Both this land and redundant, existing retail units, could be better utilised for new homes that would help regenerate the town centre in a sustainable way by reducing the need for transport due to the central location of such homes consistent with Policy CS2a). Consequently, land allocated on countryside at Humber Doucy Lane for housing may not be required and this needs to be re-examined so the Plan can be found to be sound. The SA needs to assess this option for it to be sound.