

Ipswich Borough Council Local Plan Review 2018 – 2036

Response to Matter 6 – Site Allocations

Issue: Whether the proposed site allocations in the SAP are justified taking into account the reasonable alternatives, positively prepared in meeting the Borough’s development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?

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General

76. On what basis is Policy SP1, which seeks to safeguard sites for the uses for which they have been allocated, justified and effective?

Policy SP1 is important for plan delivery and ensures developer and decision-maker clarity to identify acceptable departures on allocated sites. Allocated sites ensure proposed growth can be met through appropriate delivery. The policy is justified by development land scarcity in Ipswich, making it important to maximise prospects of securing the right development in the right place.

77. Has the viability of allocated sites been adequately tested and assessed in order to ensure that infrastructure requirements and affordable housing provision can be made at the levels needed to serve the development proposed?

The Whole Plan Viability Assessment (WPVA) (D42¹) tested an appropriate range of site typologies against proposed site allocations - in accordance with Paragraph 003 of the viability Planning Practice Guidance (PPG). This shows infrastructure requirements and affordable housing provision is achievable in certain typology scenarios, but in others not. This guided Ipswich Borough Council's (IBC) approach to secure infrastructure requirements through Section 106 (S106). This ensures optimum levels of affordable housing and infrastructure to support growth, whilst allowing flexibility for potentially less viable sites. The strategic allocations at Ipswich Garden Suburb (IGS) and Humber Doucy Lane (HDL) were tested for appropriate levels of infrastructure and affordable housing and found viable.

Strategic Allocations

Ipswich Garden Suburb (IGS) (Policy CS10)

78. What evidence is there to support the deliverability and developability of the IGS during the Plan period?

Crest Nicholson, CBRE and Mersea Homes own or have an option agreement over the majority of the IGS allocation. These developers are actively promoting their land for IGS development.

This is evident through granting outline consents across Crest Nicholson's land (Henley Gate Neighbourhood) and CBRE's land (Fonnereau Neighbourhood) totalling 1,915 homes. Crest Nicholson has recently submitted reserved matters applications for the first phase of development, including the first phase of the country park and infrastructure. Crest Nicholson have submitted details to discharge the overarching and pre-commencement conditions. Pre-

¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf

application discussions with the main landowner for the Red House Neighbourhood have occurred with further discussion imminent (I19²).

To aid and expedite the delivery of IGS, IBC setup a specific IGS Delivery Board in May 2020. IBC Chief Executive chair's the Board with the main developers and landowners, IBC, Suffolk County Council (SCC) and East Suffolk (ESC) as Members. Four meetings have been held since its establishment, and monthly meetings are scheduled.

HIF funding towards the capital cost of the two railway bridges and country park (strategic infrastructure items) is secured with Homes England to unlock site development.

As IGS is an allocation in the adopted 2017 Local Plan, it can develop without reliance on the ILPR.

79. What evidence is there to show that the infrastructure requirements listed in Table 8B for the IGS are justified, deliverable and consistent with national policy?

The infrastructure requirements through regulation³ robust assessment in preparing the adopted Local Plan and supporting SPD is required, plus Environmental Statements (ESs) accompanying applications.

The IGS SPD (2017⁴) justifies supporting infrastructure for the IGS. This was translated into the adopted Local Plan (Policy CS10 & Table 8B), and carried forward to the ILPR. The IGS Infrastructure Delivery Plan (IDP) (D47⁵) shows such requirements are deliverable. This is supported through cost plans / viability assessment for the two outline consents, HIF Funding and WPVA (D42⁶) demonstrates both developments are viable including infrastructure costs in Table 8B. NPPF (2019) Paragraph 72 supports high housing numbers being best achieved through larger scale development, supported by necessary infrastructure and facilities. Infrastructure justification in the IGS SPD is consistent with national policy and fosters sustainable development.

IGS infrastructure requirements were agreed via the S106s (January 2020).

80. The Ipswich and East Suffolk Clinical Commissioning Groups (CCGs) state that the opportunities for establishing a new health centre in the IGS are severely reduced and primary care would be provided for new patients at the Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site. Given that the SoCG [14] says that it is

² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i19_-_mersea_homes_socg_red_house_neighbourhood_final_socg_29_09_20ibc_signed_0.pdf

³ Regulation 122 of the Community Infrastructure Levy Regulations 2010

⁴ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/inf005_-_ipswich_northern_fringe_spd_-_20_february_2017_email.pdf

⁵ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/igs_idp_report_final.pdf

⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf

not reasonable to rely on the latter as part of the infrastructure strategy at the IGS, what measures are in place to ensure that the requirement for healthcare provision set out in Policy CS10 and Table 8B would be provided?

The S106 for the Fonnereau Neighbourhood (IP/14/0038/OUTFL) secures provision and transfer of a 0.4ha serviced site to IBC, for community uses including a minimum 0.2ha for health, wellbeing and/or treatment services. This means an on-site healthcare facility is under IBC control. Financial contributions for healthcare facilities are secured through the S106 for both outline consents.

The two S106s are based on responses and discussions with NHS England using a pro-rata calculation for the IGS. During negotiations, the NHS advised that their approach to healthcare changed to allow a medical centre on the Tooks site also serving the IGS. When the outlines were consented, the Tooks site was insufficiently advanced/committed to confirm the new healthcare facility. Therefore the S106s secured land and financial contributions requested by the NHS to allow either the building of a new medical centre on the IGS or Tooks site. If provided at the Tooks site, the land on the IGS could provide additional healthcare/ treatment provision such as treatment services (e.g. dentist, chiropractic service). Policy CS10 reflects this position.

Design and detail discussions for the Tooks medical centre has now taken place with IBC. The housing at the Tooks site (IP005) is due for completion by end of 2020 and land is reserved for a health centre.

The approach for future IGS developments (e.g. Red House Farm and Ipswich School) will consider appropriate S106 obligations in the light of application consultation responses.

81. As the proposed development of the IGS is required to contribute towards the Recreational Avoidance and Mitigation Strategy (RAMS), in addition to the provision of the Country Park and other on-site open space, how would this be secured and should reference to it be included in Policy CS10 and Table 8B?

The IGS developments will financially contribute towards provision and maintenance of the Country Park and other on-site open space. However, development is likely to have a residual cumulative impact of increased recreational pressure on local international sites. Therefore, this residual impact requires a financial contribution towards RAMS for mitigation. The financial contribution amount will be identified through project level (application) Habitat Regulations Appropriate Assessments and agreed with Natural England. Contributions are already secured for Henley Gate and Fonnereau neighbourhoods through S106.

The same approach will be adopted for IGS (Red House Farm and Ipswich School) as discussed with Natural England.

82. Does Policy CS10 defer important policy matters relating to the development of the IGS, including infrastructure requirements, the location of the district and local centres and the phasing of the development to the SPD? Having regard to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 should these matters be included in the Local Plan?

Policy CS10 identifies the type and amount of development needed and its broad location. Table 8B identifies infrastructure requirements. Map IGS1 indicates the phasing relevant to affordable housing and infrastructure delivery. Therefore, no key policy matters are deferred to the SPD. The SPD gives detailed guidance for policy implementation.

83. What evidence is there to demonstrate that the development of the IGS would be viable and that the target of 31% affordable housing would be deliverable, given that planning permissions for the first two phases provide for 5% and 4% affordable housing only?

The IGS IDP reviewed infrastructure costs and proved 31% affordable housing across the IGS was viable. Policy CS10 allows viability review as part of application processing and the first two phases of development with consent. The affordable housing levels secured reflect the scheme specific viability assessments taking into account the appropriate package of S106 contributions. The viability reviews secured on the consented schemes, ensure should viability improve in later phases then affordable housing should increase across the approved development sites in later phases, given this is a long-term development. The early phases of development bear significant upfront infrastructure costs, benefiting later phases. There are a further 1,585 dwellings requiring planning permission. Without the need to fund these larger infrastructure items, later phases can potentially secure greater affordable housing levels. HIF reduces infrastructure costs for all developers releasing further monies for affordable housing. The 31% target is ambitious but reflects the expectation that house values will increase as development progresses. As a long-term project there are many unknown factors that will impact on the IGS and achievable level of affordable housing.

84. What evidence is there to support the Council's assumptions in respect of the anticipated delivery rate for the IGS? Is this realistic?

IBC's assumptions are based on regular information from the main developers (every three months for HIF monitoring) who own/ promote the IGS sites and is therefore realistic. These assumptions are based on:

- Crest Nicholson has reserved matters applications in for the first development phase (Henley Gate Neighbourhood – 1,100 dwellings). A Phasing Strategy identifies anticipated phasing timescales for this neighbourhood and takes accounts of COVID-19 impact.
- IBC are working closely with Crest Nicholson on the delivery of the Homes England HIF funded infrastructure including monitoring IGS progress and achieving milestones that must be met for delivery of infrastructure and housing.

- The Mersea Homes SoCG (I19⁷) identifies expected milestones and progress to date.
- Information from the IGS Delivery Board where landowners / developers provide updates on expected housing delivery.

85. Is the phasing of the IGS justified and effective?

Yes. Phasing is set out in the IDP, delivered through three neighbourhoods. Strategic infrastructure is located in a single neighbourhood but required to mitigate cumulative impact of and to serve the whole IGS (Policy CS10 and Table 8B). Neighbourhood infrastructure is primarily identified to serve potential neighbourhood residents needs - delivered by the respective landowners /developers. The IGS SPD includes indicative trigger points for each infrastructure element related to occupation of dwellings or other events in IGS delivery rather than to a specific date/ timeline (p9 of IDP).

86. Should the Secondary School Site be shown as a broad location rather than a specific allocation on the Policies Map?

The Secondary School is better delivered through a specific allocation within the IGS. This provides both certainty on school provision and land area required, enabling relevant landowners to factor in school delivery. The IGS site reflects the secondary school location in the IGS SPD. The location chosen helps maintain the required separation between Westerfield village and IGS and allows reasonable accessibility to the whole of IGS.

87. Has the potential impact of Sizewell C been considered in respect of rail freight transport passing through the site on the Ipswich to Westerfield line?

The applications ESs factored in additional freight movements associated with Sizewell C. This identified needs for a 30m buffer from dwellings nearest the railway – as in both consents. Reserved matters application will ensure appropriate layouts and design factoring in the railway line. Sizewell C was identified in the Red House Farm EIA scoping and will be factored into future applications. IBC in the Sizewell C consultation asked EDF Energy to consider the impact on IGS. The DCO identified three additional freight movements from Sizewell along the railway line and the ES shows no undue noise or vibration nuisance given buffer separation.

88. Has sufficient provision been made within the IGS for community outdoor sport provision, in particular playing fields?

IGS developments must provide outdoor sport provision⁸. Both outline consents comply through playing fields provision and is also required on other IGS sites.

⁷ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i19 - mersea homes socg red house neighbourhood final socg 29 09 201bc signed 0.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i19_-_mersea_homes_socg_red_house_neighbourhood_final_socg_29_09_201bc_signed_0.pdf)

⁸ In compliance with Policy DM6, IGS SPD and the Open Space SPD.

89. Has sufficient consideration been given to the impact of the IGS on air quality, flood risk, drainage, the existing road network, sewerage infrastructure and biodiversity?

The outline consents were accompanied by ESs and sufficiently addressed these matters. A screening and scoping opinion was issued for the Red House Neighbourhood and the ES must address these matters. IGS was factored into relevant evidence based ILPR assessments, including: Air Quality Assessment (D33⁹); Strategic Flood Risk Assessment (I34¹⁰); Transport Modelling (D35¹¹); and Water Cycle Study (WCS) (D31¹²).

90. Should the allocation of land at IGS in the CSP also be included within Policy SP2 of the SAP?

Sites at HDL and IGS have their own policies but a modification is proposed to address this.

Humber Doucy Lane (Policy ISPA4.1)

91. Is the allocation of this site on green field land on the edge of the settlement justified? Did the SA consider reasonable alternatives to this allocation, such as more homes in the town centre or on other sites within the urban area?

The SA (A4¹³) considered HDL alternatives. Paragraph 3.10.7 identified limited potential for alternative sites. Two potential areas were identified, near Whitton Church Lane and Thurleston Lane. These areas were assessed in the SA (Appendix E) as potential reasonable alternatives. Compared to HDL, the residual scores of these alternatives scored lower against certain SA objectives¹⁴ and equal in all other objectives. Consequently, these sites were rejected.

The SA also considered alternative spatial options to Policy CS2. This included spatial option 3 (changing the use of existing land in the Borough to housing) which scored higher than the preferred option against objective 12 (reducing vulnerability to climatic events and flooding), but, scored lower against other objectives¹⁵. Consequently, this was rejected.

⁹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d33_-_ipswich_local_plan_review_aqa_vol_I_report_final.pdf

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

¹¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d35_-_wsp_transport_modelling_methodology_report_jan_2020.pdf

¹² <https://www.ipswich.gov.uk/Core-Document-Library-Page>

¹³ 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

¹⁴ Objectives 3 (health), 4 (quality of where people live and work), 11 (vulnerability to climate events/ flooding) and 17 (maintain and enhance vitality and viability of town and retail centres)

¹⁵ Objectives 1 (reducing poverty and social exclusion), 2 (meeting housing requirements), 5 (improving education and skills), 6 (conserve and enhance water quality/ resources), 9 (waste), 10 (reduce greenhouse gas

Spatial option 1, higher-density urban regeneration, scored higher than the preferred option against certain objectives¹⁶ but, scored lower against objectives 2, 4 and 5. Although spatial option 1 performed better against some of the SA objectives compared to the preferred option, it can't be independently implemented and meet the objectively assessed housing needs. This is due to the Borough's tightly drawn boundary and finite supply of suitable, available and achievable sites available to meet housing need. Therefore, allocations focus where possible on urban regeneration whilst providing sustainable urban edge development.

92. What evidence is there to demonstrate that the site will be delivered in full within the Plan period, given that it relies on the delivery of infrastructure within the Ipswich Garden Suburb site? What is the justification for this phasing? Should the Plan include a trigger point following which development on this site should begin to ensure its delivery within the Plan period?

Yes, the HDL owner promoted this site at both Reg 18 and Reg 19. There is not significant reliance on the IGS to deliver HDL. Phasing the development will ensure wider infrastructure requirements are in place to serve the development. Cross-reliance on infrastructure can be avoided by primary school provision on-site at HDL which the developer supports. A trigger is suggested allowing for flexibility to bring forward HDL not wholly reliant on IGS (see modification 6.1).

93. How will the Council work with neighbouring authorities to ensure that this site is delivered?

Both the adopted Suffolk Coastal Local Plan (SCLP) (2020) and the ILPR refer to master planning and both authorities have produced mirrored policies and common trajectories.

94. Have the impacts upon local infrastructure and services been effectively considered? In particular:

a) Is it reasonable that the development should rely on the adjacent allocation at Ipswich Garden Suburb for the provision of its primary school places?

The site owner supports primary school provision on HDL. See modification in Q92.

b) Should the policy include provision for healthcare facilities?

emissions), 16 (sustainable levels of prosperity and growth), 17, 18 (sustainable transport) and 19 (digital infrastructure).

¹⁶ Objectives 8 (soil and minerals), 12 (coast and estuaries), 13 (biodiversity and geodiversity), 14 (heritage and archaeology) and 15 (landscape and townscapes).

Policy ISPA4 clarifies that infrastructure requirements listed are not exhaustive and will be determined by joint master planning in coordination with the CCG. The reasoned justification (paragraph 8.24) also references that healthcare facilities may be needed - see CCG SoCG (I4¹⁷).

c) Should the allocation include a local centre/retail provision, as proposed in the SoCG [A28] with Suffolk County Council?

It is too early to determine whether a local centre / convenience retail is necessary. SCC SoCG (I15¹⁸) agrees a modification to paragraph 8.24 ensuring consideration through the joint master planning process.

95. The supporting text at paragraph 8.28 states that the transport mitigation measures required for this development are challenging. The Council now proposes to remove the word 'challenging' from the supporting text. However, what evidence is there to support the deliverability of these transport mitigation measures?

IBC has engaged with SCC as Highway Authority throughout the plan making process. SCC raised no concern with inclusion of criterion d of Policy ISPA4 regarding transport measures. SCC has provided detailed comments in the SoCG (I17¹⁹) in Appendix 5 which includes necessary likely highways improvements to facilitate development. This indicates these measures are deliverable.

96. Would the development of this site be viable, given the required contributions to affordable housing (30%) and infrastructure costs? Has this also taken account of the potential need for contributions to healthcare provision?

The WPVA (D42²⁰) demonstrates that development is viable with required affordable housing and infrastructure. Appendix 6 of the assessment shows that 30% affordable housing allows a surplus of approximately £27,000 per dwelling to deal with any site-specific infrastructure²¹. The £27,000 per dwelling can accommodate all infrastructure requirements, including healthcare provision if needed.

97. Would the development of this site maintain the separation between Ipswich and surrounding settlements? Should this be a requirement of Policy ISPA4, as suggested by the

¹⁷ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i4_-_nhs_ccg_socg_signed_1.pdf

¹⁸ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i15_-_ibc_scc_infrastructure_socg_combined_final_0.pdf

¹⁹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i17_-_scc_socg_transpt_pkg_final_24.9.20_jc_mf_0.pdf

²⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpva_final.pdf

²¹ For comparison, the IGS, which has significant infrastructure requirements, had a blended average of just under £13,000 per dwelling towards infrastructure costs based on the outline consents.

proposed change agreed in the SoCG [A25] with East Suffolk Council, to ensure consistency with Policy DM11?

Both authorities agreed to no development north of the railway line, preventing settlement coalescence. A proposed change to Policy ISPA4 is agreed in the SoCG (A25²²) with ESC, to ensure consistency with Policy DM11 – see MM13 of Main Modifications (I31²³).

98. Has the impact of the proposed allocation on the setting and significance of surrounding heritage assets been fully considered? Do the proposed modifications to the Site Sheet for ISPA4.1 [Appendix 18 to I12] adequately reflect the findings and recommendations of the Heritage Impact Assessment [IP30.3] for the site. Are any specific mitigation measures required within Policy ISPA4 to ensure it would be consistent with national policy in conserving the historic environment and the statutory duty to preserve the setting of listed buildings?

The Heritage Impact Assessment (HIA) (I30.3²⁴) assesses the impact on the setting and significance of historic assets. The HIA identifies parts of the allocation as possibly harmful to the setting of designated and non-designated heritage assets. In response, IBC has proposed amendments to Site Sheet ISPA4.1. These amendments were agreed with Historic England – see SOCG (I30.1²⁵ & I30.2²⁶). Policy ISPA4 needs to reflect proposed modifications to Site Sheet ISPA4.1 (6.1).

99. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet agreed with Suffolk County Council in the SoCG [A28] necessary to make the Plan sound in this respect?

SCC consider the allocation is adequately assessed but requires further investigation prior to application submission. The proposed site sheet changes agreed with SCC (I15²⁷) are necessary for soundness.

100. Should the proposed allocation be enlarged to allow for the future expansion of Ipswich Rugby Football Club or would the provisions of Policy DM5 and criterion b of Policy ISPA4 ensure the needs of the Rugby Club for replacement or additional facilities are met?

²² [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25 - statement of common ground with east suffolk council 0.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf)

²³ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31 - final draft ilp review main modifications reg 22_08_10_20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf)

²⁴ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30.3 - humber docuy lane historic impact assessment 25.09.20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30.3_humber_docuy_lane_historic_impact_assessment_25.09.20.pdf)

²⁵ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30 - historic england socg 8.10.20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30_historic_england_socg_8.10.20.pdf)

²⁶ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30.2 - appendices to historic england socg.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30.2_appendices_to_historic_england_socg.pdf)

²⁷ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i15 - ibc_scc_infrastructure_socg_combined_final_0.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i15_ibc_scc_infrastructure_socg_combined_final_0.pdf)

The proposed allocation should not be enlarged for future expansion of Ipswich Rugby Football Club. Given the Ipswich administrative boundary, the likelihood is that replacement provision would be in East Suffolk. There are no current proposals for replacement or additional facilities. Policy DM5 is the appropriate mechanism to manage future proposals.

101. Is it effective and justified to limit green infrastructure for the site to land within the allocated site?

Policy DM6 includes preference for on-site open space provision, sport and recreational facilities and should be applied to ISPA4.1.

Policy DM10 seeks a green trail around the Ipswich built edge. Sites allocated within this area must accommodate links. The HIA (I30.3²⁸) highlights the likelihood of a bespoke SANGS and advises this should be planned at development concept stage. Additional land may be required. The owner can accommodate this.

102. Would the development of this site provide any net biodiversity gains or green infrastructure as required by Policies DM8, DM10 and DM11?

Policy DM8 requires incorporation of biodiversity net gain. Policy DM10 requires green corridor enhancement and opportunities to link existing open spaces. This is illustrated on Plan 6 and the ISPA4.1 Site Sheet. The provision of SANGs and other open space is required through the Open Space Standards SPD and HRA. The site was assessed in the Wildlife Audit (D21²⁹), identifying measures to secure net biodiversity gains. HDL is not identified as Countryside (Policy DM11) on the Policies Map.

103. Has full consideration been given to the impact of the development of this site on the agricultural land, ecology, air quality, the existing road network, traffic, local services and facilities, flood risk and drainage infrastructure?

[See answer to Q141].

104. Is the wording of Policy ISPA4 clear and unambiguous, so it is evident how the decision maker should react to proposals assessed against it?

Yes. Policy ISPA 4 was agreed and aligned with ESC and reflected in the adopted SCLP.

105. What is the status of the information contained in the site sheets at Appendix 3 to the SAP? Are all of the key development constraints for the site ISPA 4.1 contained within the relevant policy?

²⁸ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30.3 -
humber docuy lane historic impact assessment 25.09.20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30.3_-_humber_docuy_lane_historic_impact_assessment_25.09.20.pdf)

²⁹ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d21 - d21.15 -
ipswich wildlife audit introduction compressed sep 19.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d21_-_d21.15_-_ipswich_wildlife_audit_introduction_compressed_sep_19.pdf)

Appendices 3A (Site Allocation Details) and 3B (Site Sheets) constitute guidance supporting SAP policies. Principle infrastructure requirements are in Policy ISPA4 as agreed with ESC.

106. Should the allocation of land at Humber Doucy Lane in the CSP also be included within Policy SP2 of the SAP?

IBC agree to this amendment.

Housing Allocations (Policies SP2 and SP3)

Land allocated for Housing (Policy SP2)

107. Are the proposed housing allocations consistent with the spatial strategy for the Borough as set out in Policy CS2?

Proposed housing allocations are consistent with spatial strategy (Policy CS2). Housing allocations are focussed in the town centre or adjacent to district or local centres. The strategic allocations at IGS (CS10) and HDL (ISPA4) form part of the spatial strategy.

108. Was the process for the selection of the site allocations robust? Was an appropriate range and selection of sites assessed and were reasonable alternatives considered? Were appropriate criteria taken into account in deciding which sites to select? Was the assessment against those criteria robust?

The site allocation selection process is based on the Strategic Housing and Economic Land Availability Assessment (SHELAA) (D13³⁰). This was in accordance with the PPG on housing and economic land availability assessment and is robust. Appendix F of the SHELAA outlines reasonable alternatives that were discounted and why. The SHELAA used 14 criteria. Eight criteria consisted of ‘constraints’³¹. The other six criteria were ‘development impacts’³².

The criteria broadly align with other ISPA authority SHELAAs, adapted to reflect authority circumstances, and relevant national guidance in the PPG³³ (Paragraph 018).

The suitability, availability and achievability of each site was assessed. SHELAA Appendix A sets out how the assessment performed.

109. Are the proposed housing allocations identified in Policy SP2 and Appendix 3 of the SAP, justified as the most appropriate sites when considered against the reasonable

³⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/shelaa_january_2020_final.pdf

³¹ Access to site; Access to wider transport networks; Access to local services & facilities; Utilities capacity; Utilities infrastructure; Contamination; Flood risk; and Market attractiveness

³² Landscape/townscape; Biodiversity and geodiversity; Historic environment; Open space; Transport and roads; and Compatibility with neighbouring use.

³³ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

alternatives and would they be consistent with national policy, with particular regard to the following:

a) The relationship of the site to the existing settlement and its accessibility to local services and facilities?

b) The evidence to support the site's 'deliverability' as defined in Annex 2 of the NPPF?

c) Their viability having regard to the provision of any infrastructure, affordable housing and other policy requirements?

NB This question should be answered for each housing allocation listed in Table 1.

The SHELAA examined residential site potential (see answer to Q108). The housing allocations represent the most appropriate SHELAA sites. All sites deemed suitable are proposed for housing allocations. Appendix 1 covers every site allocation as requested, providing additional information on the three sub-questions.

110. Is the policy approach proposed in the Plan which includes Policy SP2, along with Table 1 and Site Sheets in Appendix 3, justified and effective? Is the meaning of Policy SP2 clear and unambiguous about what type of development it applies to and what is required to comply with the policy? In short, is it clear how a decision maker should react to a development proposal on land allocated for housing in Policy SP2? Would the proposed changes set out in the Council's response to our Initial Questions in this regard provide sufficient clarity and ensure that the Policy is effective?

The first line of Policy SP2 sets out what type of development it applies to - residential development, or part residential development mixed use. Site allocations in Table 1 will deliver most of IBC's housing requirement. Proposed changes to Table 1 ensure clear key requirements for each site within policy. The amended SP2 Policy text signposts to more detailed guidance within the Site Sheets. The amended Policy is effective and justified.

111. Are the housing allocations listed in Table 1 and referred to in Policy SP2 justified and effective? What evidence is there to demonstrate that they are deliverable and/or developable in accordance with the housing trajectory and the proposed site capacity? In particular, are they:

- confirmed by the landowner involved as being available for the use proposed?***
- supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?***
- deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?***

NB This question should be answered for each housing allocation listed in Table 1.

Housing allocations in Table 1 are justified and effective. The Housing Delivery Note (I24³⁴) provides five year deliverability evidences, in accordance with NPPF Paragraph 67(a). Large

³⁴ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i24_-_housing_delivery_note_final_2.10.20.pdf

sites (50 dwellings or more) are supported by SoCGs where possible. Additional information is provided in Appendix 1 to answer the sub-questions.

112. Does Policy SP2 provide a clear indication of how a decision maker should react to a development proposal on one of the allocated sites, given the use of the phrase 'take into account appropriately'?

The proposed changes set out elsewhere to SP2 resolve this - see main modifications Table (I31³⁵).

113. Should the development requirements/constraints for each allocated site, set out in the Site Sheets in Appendix 3, including affordable housing provision, be set out clearly in the policy?

SP2 modifications include allocation specific site requirements. Site sheets contain background information and context.

Housing sites of 15+ dwellings must provide 15% affordable housing (Policy CS12). This applies across all housing sites other than IGS and HDL where a higher figure is sought because of increased profitability. Viability varies across the Borough and is reflected within Policy CS12. Therefore, it is premature to specify affordable housing requirements on a site by site basis. Only ISPA4 and CS10 are exceptions to normal CS12 requirements.

114. Should any requirements for infrastructure, services and facilities to serve the proposed site allocations be included in Policy SP2 or in a separate policy?

Infrastructure, services and facilities required are not appropriate in Policy SP2. Policy CS17 outlines the infrastructure approach in new developments. A flexible infrastructure approach is adopted because of the challenging viability situation in Ipswich. It is premature to predict infrastructure requirements now for each allocation due to market volatility and variability over time. The IDP (I16³⁶) includes anticipated infrastructure contributions for new developments.

115. Should paragraph 4.7 refer to the 496 dwellings allocated at Humber Doucy Lane in the CS as well as the 3,500 dwellings at IGS?

Yes, modification (6.2) proposed.

116. Where allocations are for mixed uses, is it effective and justified for the requirements for these sites to be included in several policies, including SP2, SP5, SP6, SP7 and SP9, or

³⁵ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31 - final draft ilp review main modifications reg 22 08 10 20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_-_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf)

³⁶ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i16 - infrastructure plan final 30.9.20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i16_-_infrastructure_plan_final_30.9.20.pdf)

should these be set out in a single policy for each mixed use site to provide a clear indication of how a decision maker should react to a development proposal on these sites?

The site allocations relate to uses and the site sheets link differing uses together, unifying the site.

117. Should Policies SP2 and SP3 refer to the allocated sites being identified on the Policies Map?

Yes - this will be added to the main modifications.

Site Specific Issues

IP009 – Victoria Nurseries, Westerfield Road

118. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

Although allocated since 1997, there has been recent active interest to bring the site forward. Therefore, the site's delivery timing in 6-10 years is reasonable.

IP010a – Co-op Depot, Felixstowe Road

119. Is sufficient land set aside within the allocation for the provision of an extension to Rose Hill Primary School?

Yes. The indicative land (0.5ha) set aside mirrors the adopted allocation. IBC understands from SCC that whilst 0.8ha is the preferred area, 0.5ha would enable the expansion to take place and maximise housing delivery. If found necessary to increase the school extension at planning application stage, this can be accommodated. The indicative residential capacity of 75 dwellings (45dph on 75% of site) is relatively modest given the site's sustainable location³⁷. There is scope to increase residential density if necessary.

120. Although the Council says that the amount of land required for each use will be subject to separate landowner discussions and may be subject to change, as noted in the SoCG [A28] with Suffolk County Council, do Policies SP2 and SP7 provide a clear indication of how a decision maker should react to a development proposal on this site?

Policies SP2 and SP7 identify the mix of uses for the site with an indicative capacity of 75 dwellings and approximate percentages for the primary school extension.

IP010b – Felixstowe Road

³⁷ Proximity to the Derby Road train station and Felixstowe Road District Centre

121. Would the noise from the existing employment uses in the centre of this site impact upon future occupiers of the residential elements of this allocation? Would this impact upon its deliverability?

IP010b Site Sheet explains the central section of the site has had no indication from the users that they may relocate. These users include a large retail unit (A1), office (B1a) and B1(c), all suitable in a residential area without detriment to amenity. Trip generation for such uses are not considered to cause significant noise levels. The 62 dwelling capacity (45dph on 50% of site) is relatively modest and deliverable.

IP011c – Smart Street/Foundation Street (North)

122. Has the impact of the proposed allocation on archaeology been fully considered?

Yes. IBC worked with SCC Archaeology and Historic England throughout the plan making process successfully. This includes modifications, where appropriate.

123. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

The site is IBC owned and currently a temporary car park (IP/20/00120/FPI3) with permission lapsing in April 2022 ensuring future redevelopment is not prejudiced. IBC propose delivery during years 6-10.

IP012 – Peter’s Ice Cream, Grimwade Street

124. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

This is a prominent corner site at Grimwade Street and Star Lane. The area has undergone significant regeneration providing the new Suffolk New College and University of Suffolk campus. The site to the north is undergoing Council led redevelopment for 16 flats (IP/19/01118/FUL). Consequently, the site will come forward in 6-10 years.

IP032 – King George V Field, Old Norwich Road

125. Would the development of this site be viable?

The indicative capacity and density indicates a 100% housing or housing-led scheme. The WPVA (D42³⁸) demonstrates that housing-led typologies on greenfield sites are viable.

126. Is sufficient detail given about the amenity green space required as part of the site’s development?

³⁸ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf

Policy SP6 allocates approximately 20% of the site for open space/ playing pitches, aided by the existing playing pitches. This is reflected in Policy SP2 and Site Sheet IP032. The level of detail for this allocation is sufficient. Specifying the exact open space requirements is too prescriptive now and is too inflexible. The detail should be agreed at the planning application stage.

127. Is Policy SP6 sufficiently clear about the requirements for replacement pitch and ancillary facilities?

The replacement playing pitches and ancillary facilities are expected to be outside IBC, within Mid Suffolk (permission 0254/13). It would be inappropriate to refer to this land within Policy SP6. The site sheet allows for prior provision of replacement playing pitches and ancillary facilities.

IP035 – Key Street/Star Lane/Burtons (St Peter’s Port)

128. Would the development of this site be viable with the capacity proposed?

The WPVA (D42) indicates that site development in lower value zones is less viable. The proposed site density (200dph) is very high and development is likely as flats only.

Typologies H (75 flats at 508dph) and K(1) (150 flats at 125dph) in the WPVA are most comparable. Increasing density by 25dph improved viability by approximately £6million (H) and £12m (K(1)) respectively. However, both typologies would still be unviable by considerable margins, despite this.

This site has significant development constraints which would likely incur costs above what would normally be accounted for in the WPVA abnormal cost³⁹.

Given the site is within an Opportunity Area, to make more viable, efficient use of this brownfield site, the SAP proposes a high capacity of 200dph - significantly higher than the typical 90dph (Policy DM23). A higher density is unrealistic due to on-site and adjacent heritage constraints.

129. Should the Site Sheet refer to the need for car parking to be incorporated into this development to support it and developments on IP206 and IP211?

The Parking Strategy (D41⁴⁰) did not identify parking need here. The sites referenced are all in highly accessible and sustainable locations.

³⁹ Constraints include for example: archaeology; listed buildings; air quality management area; potential contamination; and flood risk.

⁴⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_parking_strategy_final.pdf

130. Would a more cautious approach to the delivery of this site be necessary given its constraints in relation to its siting between two busy roads?

The one way road system around the site is not a delivery barrier. The Highway Authority (SCC) raised no objection. Planning permission (07/00555/FUL) has previously been granted.

IP037 – Island Site

131. Would an additional access be required to enable development? If so, what is the justification for this?

The SCC SoCG (I17⁴¹) addresses site access in Appendix 4 and a modification is proposed to paragraph 8.247 (6.3) to reflect this.

132. Is the requirement for 15% amenity green space for this site, set out in Policy SP6, justified?

Yes, the Open Space SPD identifies a shortfall of amenity green space here and the development scale requires SANGs.

133. Would a more cautious approach to the delivery of this site be necessary given the requirement for an additional access and that it has been allocated since 1997?

The site benefits from the 2019 tidal surge barrier. Two pre-application discussions have occurred in the last year. This key site is scheduled to come forward in years 10-15 to reflect its complexity.

134. Should reference to early years provision be included in Table 1 in Policy SP2 for this site?

Yes - see proposed main modification MM68 (I31⁴²).

IP048a – Mint Quarter/Cox Lane East Regeneration Area

135. Is the mix of residential and primary school uses appropriate on this site?

Yes. The Education Authority has not objected to the juxtaposition of uses and any special considerations such as pupil safety can be dealt with through design/ layout.

136. Has sufficient consideration been given to the impact of the development on the heritage assets?

⁴¹ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i17 - scc socg transpt. pkg final 24.9.20 jc mf 0.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i17_-_scc_socg_transpt._pkg_final_24.9.20_jc_mf_0.pdf)

⁴² [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31 - final draft ilp review main modifications reg 22 08 10 20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_-_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf)

Yes. NPPF Paragraph 193 highlights the need to enhance the setting of heritage assets. Development must adhere to these requirements and these are guiding principles to achieve regeneration aims of the Opportunity Area. The applicant must demonstrate that heritage has been suitably addressed.

137. Should reference to early years provision be included in Table 1 in Policy SP2 for this site, as agreed in the SoCG [A28] with Suffolk County Council?

Yes - see proposed main modification MM69 (I31⁴³).

IP054b – Land between Old Cattle Market and Star Lane

138. Does the extent of this site allocation enable it to contribute to the wider regeneration aims of Opportunity Area B?

This site and route of Turret Lane are key links between the Waterfront and town centre. Therefore, linking Star Lane to Old Cattlemarket Bus Station are key wider regeneration aims. Old Cattlemarket Bus Station is under different ownership and including it within IP054b is inappropriate as no evidence exists that the bus station plans to cease operating.

139. What is the justification for the allocation of this site for residential uses only as opposed to mixed uses given its location in the town centre?

The site is allocated for mixed uses and 60% housing and 40% small scale retail/leisure uses and electricity substation.

140. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

The site is key to meeting housing need in years 6-10 and regeneration objectives, including Plan Objective 6 (Transport and Connectivity), and for development of Opportunity Area B. Since 1997, the northern end of Turret Lane has delivered housing. The former print works east of Turret Lane (IP054a) is currently being redeveloped.

IP061 – Former School Site, Lavenham Road

141. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, green space, heritage assets, the living conditions of neighbouring residents, highway safety and car parking, local services and facilities and local wildlife?

⁴³ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_-_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf

The suitability and impact of IP061 and all sites have been through a rigorous assessment process through the SHELAA (D13⁴⁴), SA (A4⁴⁵), HRA (A6⁴⁶) and the Wildlife Audit (D21⁴⁷). This addresses impact on agricultural land, ecology, air quality and flood risk. All sites were assessed by highways (SCC) including impact on the existing road network, site access and potential transport mitigation measures. The SHELAA addresses access to local services and facilities and IBC has worked with Anglian Water and other authorities in its WCS. In addition, the ISPA transport mitigation strategy developed by SCC ensures measures to reduce car dependence and improve town centre air quality. The SFRA refresh, outlines individual site assessment for every residential allocation at risk of flooding, identifying suitable mitigation measures. Allocations were subject to early consultation with statutory bodies.⁴⁸

IP089 – Waterworks Street

142. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?

[See Q122 response]

IP098 – Transco south of Patteson Road

143. Has full consideration been given to the impact of the development of this site on the living conditions of neighbouring residents and car parking?

The site sheet requires scale, appearance and design to respond to context. Development opportunities suggest improved public spaces and pedestrian and cycle links to improve the lives of local residents. Scale of development will generally be medium-rise (3-5 storeys) with taller buildings only in key locations. The site is within the IP-One area where maximum parking standards apply (Policy DM22).

IP132 – Former St Peter’s Warehouse, 4 Bridge Street

144. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

⁴⁴ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/shelaa_january_2020_final.pdf

⁴⁵ 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

⁴⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_hra_reg_19_stage_130120_final.pdf

⁴⁷ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d21_-_d21.15_-_ipswich_wildlife_audit_introduction_compressed_sep_19.pdf

⁴⁸ The answer to this question and evidence base cited also applies to identical questions 103 (ISPA4), 147 (IP150d), 153 (IP150e), 155 (IP307), 156 (IP354) and 188 (IP150b).

The site was affected by the 2008 recession. IBC own it and is actively developing plans for site delivery. Therefore, years 6-10 delivery is appropriate.

IP136 – Silo, College Street

145. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

The site was affected by the 2008 recession. IBC own it and is actively developing plans for site delivery. Therefore, years 10-11 delivery is appropriate.

IP150d – Land South of Ravenswood – Sports Park

146. Should the development of this site be co-ordinated with the housing development at IP150e and the employment development at IP150c?

Yes. The allocation through Policy SP2 Table 1 identifies Ravenswood allocations for comprehensive master planning. All allocated land is owned by IBC and are being comprehensively planned.

147. Has full consideration been given to the impact of the development of this site on the local highway network, sewage and drainage capacity, the AONB, ecology, local services and facilities and local wildlife?

[See answer to Question 141].

148. Would the unusually shaped nature of this site impact upon the deliverability or capacity of the allocation?

No. The allocation boundary is drawn to reflect existing SUDS infrastructure and allows for three-storey single depth crescent development.

149. Would the proposed allocation provide an appropriate mix of housing?

The allocation accommodates an appropriate housing mix reflecting Policy CS8 and the SHMAA.

150. Would a more cautious approach to the delivery of this site be necessary?

The site is IBC owned and negates a more cautious approach. It is scheduled for delivery in years 6-10.

IP150e – Land South of Ravenswood

151. Should the development of this site be co-ordinated with the housing development at IP150d and the employment development at IP150c?

Policy SP2 Table 1 identifies the need for master planning. The site sheet needs updating to expand Ravenswood master planning references (modification 6.7). All the allocated land is IBC owned.

152. Would the proposed allocation provide an appropriate mix of housing?

The development accommodates an appropriate housing mix reflecting Policy CS8 and SHMAA.

153. Has full consideration been given to the impact of the development of this site on the local highway network, sewage and drainage capacity, the AONB, ecology, local services and facilities, climate change and local wildlife?

Yes – main modification proposed in relation to the AONB (MM139) (I31⁴⁹).

[See answer to Question 141].

154. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

The site is IBC owned, and negates a more cautious approach. The delivery is planned spanning years 4-6. The site was allocated for employment use in the adopted Local Plan and is allocated for residential use for the first time.

IP307 – Prince of Wales Drive

155. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, green space, the living conditions of neighbouring residents, biodiversity, highway safety and car parking, local services and facilities and local wildlife?

[See Question 141].

IP354 – 72 (Old Boatyard) Cullingham Road

156. Has full consideration been given to the impact of the development of this site on the living conditions of neighbouring residents, highway safety, traffic congestion and car

⁴⁹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_-_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf

parking, pollution, flood risk, play provision, drainage and sewage capacity, local services and facilities and local wildlife?

[See Question 141].

157. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?

[See Q122 response]

IP355 – 77-79 Cullingham Road

158. Has full consideration been given to the viability of the development of this allocation when assessing the site's capacity, including the 10m buffer zone along the river?

Yes. The reasoned justification (paragraph 10.6) of Policy DM10 (Green Corridors) clarifies this. Buffer zone designation does not necessarily prohibit development coming forward, but should demonstrate enhancement/ maintenance of the river corridors ecological quality.

159. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?

[See Q122 response]

Housing Sites with PP or awaiting a S106 Agreement (Policy SP3)

160. Is the policy approach proposed in the Plan which includes Policy SP3, along with Table 2, justified and effective? Is the meaning of Policy SP3 clear and unambiguous about what type of development it applies to and what is required to comply with the policy, should the permission fail to be issued or implemented and lapse during the Plan period or the development fails to come forward or be completed in accordance with the permission? In short, is it clear how a decision maker should react to a development proposal on land with planning permission or awaiting a S106 Agreement in Policy SP3? Would the proposed changes set out in the Council's response to our Initial Questions in this regard provide sufficient clarity and ensure that the Policy is effective?

Policy SP3 ensures consented sites or with resolution to grant consent for residential use are safeguarded, should the consent lapse or development stalls. Such sites are significant accounting for potential supply of over 1,400 dwellings. Proposed modifications MM67 and MM73 extend the policy box around Table 2 indicating inclusion in the policy.

161. Are the housing sites with planning permission or awaiting a Section 106 Agreement listed in Table 2 and referred to in Policy SP3 justified and effective? What evidence is there to demonstrate that they are deliverable and/or developable in accordance with the housing trajectory and the proposed site capacity? In particular, where a site:

- **benefits from planning permission which has not yet been implemented, what evidence is there to support its start date, build out rate and completion?**
- **has started and then stalled, what evidence is there to support its recommencement, build out rate and completion?**
- **is awaiting the completion of a Section 106 Agreement, what evidence is there to support the timescale for completion of the legal agreement, the discharge of any planning conditions and its start date, build out rate and completion?**

NB This question should be answered for each site listed in Table 2, as appropriate.

The Housing Delivery Note (I24⁵⁰) provides site information within the five-year housing land supply. The SP3 sites not covered are:

- IP088, IP165, IP169, IP211 and IP214, because they are wholly completed;
- IP042 Land between Cliff Quay and Landseer Road, because the application was withdrawn; and
- IP206 Cranfields – The 2008 recession occurred when the external building had been completed but internal accommodation required fitting out. Subsequently, issues concerning external cladding including legal action has added delays.

162. Is it reasonable to include these sites in the calculation of housing supply?

Yes. Sites with delivery uncertainty have been de-allocated (e.g. IP226 - Policy SP4) and the housing land calculation in Policy CS7 allow 10% slippage in the 'committed' side of the housing land supply.

IP150a – Ravenswood U, V, W

163. Has full consideration been given to the impact of the development of this site on the local highway network, including the cumulative impact of other nearby development proposals, and local services and facilities?

The Highway Authority assessed the pending application (20/00781/FUL) and raised no objection, subject to conditions. This included consideration of the criteria in Q163.

164. Would the proposed allocation provide an appropriate mix of housing?

Development accommodates an appropriate housing mix reflecting Policy CS8 and SHMAA.

IP206 – Cranfields, College Street

⁵⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i24_-_housing_delivery_note_final_2.10.20.pdf

165. Is the capacity figure conservative? Could more dwellings be accommodated on this site?

IP206 capacity is based on latest consent evidence. This is a more accurate capacity estimation and should not be increased.

IP211 – Regatta Quay

166. Is the capacity figure conservative? Could more dwellings be accommodated on this site?

Regatta Quay is built out and sold out and therefore no potential for additional dwellings.

IP279a – Former British Telecom, Bibb Way

167. Has full consideration been given to the impact of the development of this site on local wildlife?

The Wildlife Audit 2019 considers the site of low biodiversity value but connectivity with the adjacent canal corridor gives potential for possible protected species to be present nearby and is acknowledged in the site sheet. It identifies mitigation measures such as a sensitive lighting scheme and integrating SuDS requirements with habitat creation opportunities.

Land allocated for Employment uses (Policy SP5)

168. What evidence is there to support the deliverability of the land allocated for employment use in Policy SP5?

The employment land allocations are deliverable. Since 2011, monitoring evidence in the annual Employment Land Availability Report (ELA) (2019)⁵¹ demonstrates that 1.47ha of employment land was completed on an average yearly basis. The ELA identifies 7.42ha of employment development across three sites under construction, highlighting a strong demand for employment development.

The Economy Topic Paper (with addendum) (15⁵²) sets out the anticipated site delivery timeframes. A number of the sites are IBC owned which provides deliverability confidence. Specific evidence is identified elsewhere.

169. Would any changes be required to the policy to address the changes to the Use Classes Order, introduced in September 2020?

⁵¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ela_report_nov_19.pdf

⁵² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i5_-_economy_topic_paper_with_2020_addendum_final.pdf

IBC is looking to make changes to Policy SP5 to reflect this.

170. Is the policy approach proposed in the Plan which includes Policy SP5, along with Table 3 and Site Sheets in Appendix 3, justified and effective? Is the meaning of Policy SP5 clear and unambiguous about what type of development it applies to and what is required to comply with the policy? In short, is it clear how a decision maker should react to a development proposal on land allocated for employment in Policy SP5? Would the proposed changes set out in the Council's response to our Initial Questions in this regard provide sufficient clarity and ensure that the Policy is effective?

Policy SP5 sets out applicable development types. Site allocations in Table 3 will deliver employment needs and address individual site-specific constraints. The proposed changes to Table 3, mirrors the amended SP2 format, ensuring clear key requirements for each site. The modified SP5 Policy signposts the more detailed site sheet guidance, directing the decision maker effectively.

171. Are the employment allocations listed in Table 3 and referred to in Policy SP5 justified and effective?

Yes – the policy provides a good mix of small and large sites, brownfield and greenfield in different locations to address potential needs and is justified and effective.

172. Has sufficient land been allocated to meet the identified employment needs?

Yes – The plan allocates an additional 5.14ha of employment land (22% above minimum identified need).

IP141a – Land at Futura Park, Nacton Road (formerly the Cranes Site)

173. Has full consideration been given to the impact of the development of this site on the AONB?

Yes – see main modification proposed (MM133) (I31⁵³).

174. Is the site deliverable given the issues encountered in marketing the site for the B Class uses proposed?

⁵³ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i31_-_final_draft_ilp_review_main_modifications_reg_22_08_10_20.pdf

Futura Park is a prime employment area attracting many quality operators. It is located off the A14 and has proved deliverable. The ELSA (D1⁵⁴) recorded it as one of the highest scoring employment sites. Various plots of IP141 have been developed recently (e.g. 18/00897/FUL) since its adopted Local Plan allocation. There is also an extant permission (20/00137/FUL) on part of IP141a(1) and pending discharge of conditions.

IP150c – Land South of Ravenswood

175. What is the justification for the allocation of this site for employment uses?

The ELSA (D1) scored the site 21/ 25, above average for employment sites. This score matches the adopted allocation IP147⁵⁵, a recently developed site of nearly identical size. This justifies employment use. The site is unsuitable for residential use due to proximity to Nacton Road – see SHELAA (D13⁵⁶).

176. Should the development of this site be co-ordinated with the housing developments at IP150d and the employment development at IP150e?

Yes. The site sheet requires master planning with other Ravenswood allocations, and IP152 Airport Farm Kennels.

177. Have the cumulative impacts on traffic, air quality, noise, heritage and ecology of the development of this site, along with the housing allocations at IP150d and IP150e, and the employment allocation at IP152 (Airport Farm Kennels) been fully considered?

Yes, the traffic and air quality modelling includes cumulative impact. The wildlife audit takes a comprehensive approach. Any application requires submission of assessments to address these issues. Archaeology is site specific and there is no known impact. The HRA and SA consider cumulative impacts. The employment land is physically separated from the existing Ravenswood housing development, minimising noise impact.

178. How would the access to the site be provided? Would any access also serve the housing allocation at IP150e and the wider Ravenswood?

IBC with SCC are developing highway options to reduce present and future local highway impact. The employment trajectory (I5⁵⁷) predicts that this site will not come forward before 2028, providing adequate time to adjust access requirements accordingly.

⁵⁴

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/14400.02_final_ipswich_elsa_report_12.04.18.pdf

⁵⁵ 18/00534/FUL

⁵⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/shelaa_january_2020_final.pdf

⁵⁷ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i5_-_economy_topic_paper_with_2020_addendum_final.pdf

IP152 – Airport Farm Kennels, north of the A14

179. What is the justification for the allocation of this site for employment uses?

The site is an adopted Local Plan allocation. The landowner supported employment use at the Final Draft (Regulation 19) consultation stage. The ELSA (D1) scored the site 20/ 25, above average. It is a large (7.37ha) greenfield site solely for employment use, rather than mixed use, which are in limited supply. It scored highly because of very good access to the strategic road network (A14) and by the same token is unsuitable for residential use.

180. Has full consideration been given to the impact of the development of this site on the local road network?

IBC with SCC are developing highway options ensuring reduced impact on the local highway network now and in the future.

181. Is the reference to the Council investigating the feasibility of park and ride on part of this site in Table 3 and in Policy SP9 justified and effective, given the objections from the landowner? Is it the intention of the Council to ‘safeguard’ part of the allocation as a site for park and ride? If so, should this be made explicit in Policies SP5 and SP9 of the Plan? If not, do Policies SP5 and SP9 provide a clear indication of how a decision maker should react to a development proposal on this site, in particular whether provision for park and ride will be a requirement?

The policy addresses the feasibility for the site only. To date this has not been undertaken by SCC. When completed the site will be re-assessed. If justified, IBC will consider options to secure the site. Therefore, it is essential the site is safeguarded.

Allocations for Open Space and Leisure Uses or Community Facilities (Policies SP6 and SP7)

182. Does Policy SP6 provide a clear indication of how a decision maker should react to a development proposal for public open space on Site IP083?

Suggest modification to Policy SP6 (6.5).

183. What evidence is there to support the deliverability of leisure uses and community facilities allocated in Policy SP7?

A pre-application for the health centre at the Tooks site is underway (IP005). Primary school extensions and early years provision are funded through S106 and delivered by SCC. Table 8a outlines funding delivery. The SEND school (IP129) is fully DfE funded. IBC has a track record in ensuring appropriate delivery of leisure and community facilities. The Sports Park is a longer term political ambition forming part of the early Ravenswood master planning. Although originally envisaged as sports centre-type facilities, this purpose is now served by

Gainsborough Sports Centre nearby. Usage changed to a specialist cycling facility that delivered through national funding from sports bodies e.g. British Cycling.

IP037 – Island Site

184. On what basis has 15% Open Space been allocated on the Island Site?

The Open Space SPD identified a shortfall of amenity green space here. The scale of the site requires SANGs.

Policy DM6 (Paragraph 9.6.2) requires green space on high density residential development to be a minimum of 15% of the site area, to compensate for more limited amenity space.

IP150b – Land South of Ravenswood

185. Is the allocation of this site for a Sports Park justified?

The Sports Park is a longer-term political ambition arising from early master planning for Ravenswood. As an IBC owned site with additional funding it will come forward. This site has been carried forward from the adopted Local Plan.

186. Has full consideration been given to the impact of the development of a Sports Park on this site on the AONB?

The SA (A4⁵⁸) assessed allocation IP150b against the 19 SA objectives. This includes objective 15⁵⁹ and the residual score shows the allocation having a positive impact on the AONB as it protects and maintains landscape adjacent to the AONB.

187. Has full consideration been given to how access could be made to this proposed Sports Park?

Yes – forms part of the work commissioned with SCC, and was assessed when first allocated by SCC. It is anticipated this site would be included in the Ravenswood master planning process.

188. Has full consideration been given to the impact of the development of a Sports Park on ecology, as well as traffic congestion in the locality?

[See Q141 response].

⁵⁸ [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](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)

⁵⁹ Objective 15 - Conserve/ enhance the quality and local distinctness of landscapes and townscapes

189. Should further details be provided in respect of the types of facilities to be provided?

No in the absence of master planning. Identifying specific use/ facility now might prejudice future site development.

Orwell Country Park Extension (Policy SP8)

190. Does Policy SP8 provide a clear indication of how a decision maker should react to a development proposal for the Orwell Country Park extension on this site? Should it contain any criteria against which to assess any proposal?

Policy SP8 safeguards land at Pond Hall Farm as an extension to Orwell Country Park. IBC agree that it would be advisable to include clear criteria for any proposal assessment. A main modification to Policy SP8 (6.6) is proposed.

Land safeguarded for transport infrastructure (Policy SP9)

191. Policy SP9 refers to the Council investigating the feasibility of park and ride on part of IP152 – Airport Farm Kennels. What evidence is there to support the need for and deliverability of additional park and ride at this site?

IBC supports a park and ride site use for Ravenswood and Nacton Road residents, and workers in surrounding commercial businesses.

This is an adopted allocation in the 2017 Local Plan. The SAP only commits to investigating the feasibility of a Park and Ride, unlike the Anglia Parkway site which is safeguarded. The feasibility work will be dependent on detail from other work streams such as the countywide Local Transport Plan. A park and ride use here helps achieve sustainable transport goals.

192. Is it clear from Policy SP9 and Table 6 how much land is reserved for specific transport infrastructure?

The policy makes developers aware of transport infrastructure requirements associated with specific sites, rather than being prescriptive on land requirements.

193. Does Policy SP9 provide a clear indication of how a decision maker should react to a development proposal for transport infrastructure on the allocated sites?

A main modification to Policy SP9 is suggested (6.4).

194. Are the transport infrastructure requirements at IP037 - Island Site set out in Table 6 to Policy SP9 justified and effective?

Yes - Additional vehicular access is needed to enable the site development. Additional cycle and pedestrian connections comply with policy SP15. Development layout should not prejudice future Wet Dock Crossing provision. These crossings are supported by SCC as essential given the failure of the Three Bridges scheme.

MIQ Addendum

Site IP067a – Former British Energy Site, Cliff Quay

253. Could an acceptable standard of residential amenity be achieved for the proposed housing allocation on the former British Energy site at Cliff Quay, given its proximity to the Cliff Quay Water Recycling Centre?

Yes – The site sheet clearly identifies the suitable location for housing, furthest away from the Cliff Quay Water Recycling Centre (WRC). This is a similar distance to existing properties on Pipers Vale Close. Suggested modification proposed - see SoCG (A24⁶⁰).

254. How far across the site does the odour dispersion contour extend, as referred to in the Statement of Common Ground with Anglian Water Services [A24]? What mapping evidence is available to show which areas of the site lie outside of the contour and how many dwellings those areas could accommodate?

The odour dispersion contour was not included in AW's Preferred Options (Regulation 18) representations. This is its first reference. The paragraph references that the contour "extends between 300 and 370m from the northern boundary of Cliff Quay Water Recycling Centre." Without seeing a copy of the contour, it is not possible to determine definitively how far across the site the contour extends.

IBC are willing to review its position once information is provided. The boundary of IP067a has been formulated on the basis of a 200m buffer from the WRC. This was deemed an acceptable distance for the Pipers Vale Close development.

255. Would the Council's proposed changes to the site sheet for IP067a, set out in the Statement of Common Ground [paragraph 10.3 of A24], provide the necessary policy safeguards to ensure an acceptable standard of residential amenity? Should they be treated as proposed Main Modifications?

The modification proposed in 10.3 (A24) provides necessary policy safeguards. It is not included in the Main Modifications table because it was an area of disagreement between AW and IBC in the SoCG. IBC is willing for this to be treated as a main modification.

⁶⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/revised_08-06-20_a24_-_statement_of_common_ground_with_anglian_water_red_0.pdf

256. Would the development of this site be viably able to support the associated water, surface water flood management, highways, open space and recreational infrastructure identified in the development constraints on the site sheet?

The indicative capacity is 17 dwellings at 45dph and therefore likely to be houses. It is a lower value zone brownfield site. The WPVA (D42⁶¹) indicates that although housing developments are more viable than flatted developments, brownfield sites in lower value zones are unviable. The site deliverability is dependent on improved market values being achieved over time. The site delivery is due in year 13 when economic circumstances will have changed.

257. Issue from email dated 04/11/2020 regarding Department for Education Pupil Yield Monitoring – Ipswich Garden Suburb viability

The SCC ELIP (2017) is already referenced in the CDL (H10). It has been used by SCC and IBC to inform education provision discussions. IBC with SCC developed an IDP (I16) using more recent estimated contributions for education requirements than set out in this document.

A note was prepared (H11.1) which considers and explains the DFE Guidance on Modelling Education Provision in Garden Suburbs, and Securing developer Contributions for Education Guidance.

IGS education requirements and contributions were the subject of detailed viability, S106 discussions and agreement between SCC (education provider), IBC and landowners. These are reflected in the S106 to relevant consent. As these are agreed and up to date, there is no need to re-visit IGS expected education contributions.

Word Count⁶² = 5,726 (14.5% over)

⁶¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf

⁶² Excludes cover (77 words), Suggested Mods (1,698 words), Footnotes (315 words), Questions (4,342 words), Quotes (15 words), Addendum Qs 253-256 (262 words) and Education question 257 (120 words)

Suggested Modifications

Modification No.	Page of Final Draft Local Plan Review	Policy/ Paragraph of Final Draft Local Plan Review	Main Modification	Reason
6.1	41 – 42	Policy ISPA4 and reasoned justification	<p>Modification to Policy ISPA4:</p> <p>Policy ISPA4: Cross Boundary Working to Deliver Sites</p> <p>Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner. In order to meet housing needs within the Borough boundary as far as possible, the Council identifies a cross-border allocation for future development of 23.62ha of land within Ipswich Borough in 4 parcels forming ISPA4.1 for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. The allocation is shown on the accompanying site sheet for this policy. Development here will need to be appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure. <u>This should not be such as to disadvantage the development of the Humber Doucy Lane allocation. The Humber Doucy Lane development will be triggered by the provision of the primary school as part of the Red House element of Ipswich Garden Suburb or agreement with the landowner as part of the signing of an agreement through the Local Government Act to secure the primary school on the Humber Doucy Lane whichever comes first.</u></p> <p>It will require land and infrastructure works and green infrastructure (including Suitable Alternative Natural Greenspace) to be provided comprehensively as part of the joint master</p>	In response to questions 92 and 98 of the MIQs.

			<p>planning. Development would be planned and delivered comprehensively, and would be master planned jointly with land within East Suffolk Council as identified through the Suffolk Coastal Local Plan. <u>Any masterplan work should take forward the recommendations set out in the Heritage Impact Assessment (HIA) commissioned by Ipswich Borough Council September 2020, which forms part of the evidence base for the local plan. The HIA discusses the sensitivity of the area and makes recommendations about how to bring forward development with regard to the sensitives of the historic landscape.</u> Development will include at least 30% affordable housing provision. The percentage and mix will be determined through the master planning process, having regard to policies CS8 and CS12 and the Suffolk Coastal Area Local Plan affordable housing requirement applied to the portion of the site falling within East Suffolk.</p> <p>The development must respect the maintenance of separation between Ipswich and the surrounding settlements which is important to the character of the area.</p> <p>New homes would be limited to south of the railway line and adjacent to the urban area. The design, layout and landscaping of the development should be carefully designed to preserve <u>and enhance</u> the setting of the nearby listed buildings. Infrastructure requirements would include the following but may include other infrastructure which will be determined as part of the joint master planning process:</p> <ul style="list-style-type: none"> a. Primary school places and an early years setting to meet the need created by the development; b. Replacement sports facilities if needed to comply with policy DM5; c. A layout and design that incorporates a ‘green trail’ walking and cycling route around the edge of Ipswich which also contributes positively to the enhancement of strategic green infrastructure to deliver benefits to both people and biodiversity and to help new developments deliver biodiversity net gain; and 	
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			<p>d. Transport measures including highway and junction improvements on Humber Doucy Lane and Tuddenham Road, walking and cycling infrastructure to link to key destinations including the town centre, and public transport enhancements.</p> <p>Modifications to reasoned justification:</p> <p>8.24 One area where a cross-border allocation for future development has been identified is the northern end of Humber Doucy Lane adjacent to Tuddenham Road, where land was promoted through the previous Local Plan Review and again through the call for sites process in 2017. The indicative development capacity of the land within the boundary of Ipswich Borough Council is 449 496 dwellings. The site sheet ISPA4.1 in Appendix 3 of the Site Allocations DPD provides further information on this indicative capacity. In addition, the Suffolk Coastal Local Plan has allocated a site on the East Suffolk side of the Ipswich boundary. It is essential that the two authorities work together to provide a comprehensive approach to the land as planned development. Policy ISPA 4 identifies the likely impacts of the development which would have to be mitigated in relation to demand arising from potential residents such as transport infrastructure and sustainable transport initiatives to create potential for a substantial modal shift change and green infrastructure. As part of the master plan work, mitigation measures required that arise from demand created by the development will be reconsidered, including possibly the need for convenience retail and healthcare facilities.</p> <p>8.26 Development in this allocation for future development will be required to deliver high quality design, which sensitively addresses adjacent countryside, biodiversity and existing dwellings. The development should also seek to preserve <u>and enhance</u> the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse. <u>The HIA also identifies a number of non-designated heritage assets which development must also have regard to in terms of impact on</u></p>	
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			<p><u>significance</u>. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable.</p> <p>(NB; modifications already proposed to ISPA4 and RJ through MM13 and MM14 have been incorporated into the above text but not shown as modifications here)</p>	
6.2	28	<p>Site Allocations DPD: Paragraph 4.7</p>	<p>Modification to Paragraph 4.7:</p> <p>The indicative capacity of the sites in table 1a listed in the policy above is 2,750 dwellings. These will contribute to meeting the minimum housing requirement of 8,010 dwellings by 2036, as identified through Policy CS7 of the Final Draft Core Strategy. In addition, the Final Draft Core Strategy allocates land for the development of approximately 3,500 dwellings at Ipswich Garden Suburb (the Ipswich Northern Fringe) through policy CS10, with delivery expected to start in 2019 and end in 2036. The Core Strategy review also identifies a cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure at the northern end of Humber Doucy Lane adjacent to Tuddenham Road, through Policy ISPA4 <u>providing for an additional 449 dwellings</u> (this reduction is due to findings of the HIA).</p>	<p>In response to question 115 of the MIQs.</p>
6.3	105	<p>Core Strategy DPD: Paragraph 8.247</p>	<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. The £10.8m Suffolk County Council reserved to help support this as a contribution is reflected in the ISPA SoCG Iteration 6.</u></p>	<p>In response to question 131 of the MIQs.</p>

6.4	46	Site Allocations DPD: Policy SP9	<p>Modification to Policy SP9:</p> <p>Policy SP9 - Safeguarding land for transport infrastructure</p> <p>Development of the following sites for the uses allocated through other policies in this plan shall incorporate provision for transport infrastructure, as specified in Table 6 below.</p> <p><u>Applications must ensure that:</u></p> <p><u>a) the relevant infrastructure has been incorporated in the broad location specified in Table 6;</u></p> <p><u>b) appropriate phasing is designed to incorporate the provision of the given infrastructure before the development is completed;</u></p> <p><u>c) the design of the proposed infrastructure is appropriate to its location; and</u></p> <p><u>d) Suffolk County Council considers the design safe and that appropriate measures are in place for future maintenance.</u></p> <p>The park and ride site at Anglia Parkway is safeguarded for future re- use for park and ride and is appropriately allocated on the Proposals Map.</p>	In response to question 193 of the MIQs.
6.5	41	Site Allocations DPD: Policy SP6	<p>Modification to Policy SP6:</p> <p>Policy SP6 Land allocated and protected as open space</p> <p>Existing open spaces are defined on the policies map. Within the defined open spaces, Core Strategy Review policy DM5 shall apply.</p> <p>Site IP083 - The banks of the River <u>Orwell</u> upriver from Princes Street is allocated for public open space. Any development <u>proposals related to the delivery of the open space</u> shall retain the river path and its setting.</p>	In response to question 182 of the MIQs.

			Development of the following sites shall include more than the minimum amount of on-site public open space provision required through policy DM6, as specified in table 4 below:	
6.6	45	Site Allocations DPD: Policy SP8	<p>Modification to Policy SP8:</p> <p>Policy SP8 Orwell Country Park Extension</p> <p>Site IP149 Land at Pond Hall Carr and Farm is allocated as an extension to Orwell Country Park, to provide better management of visitors to this part of the Orwell Estuary Special Protection Area.</p> <p><u>Any planning application associated with the site use for a Country Park extension will need to:</u></p> <p>a) <u>Manage recreational pressures on the Orwell Estuary;</u></p> <p>b) <u>Be supported by an appropriate EIA;</u></p> <p>c) <u>Ensure that the uses are comparable for the sensitivity of the site;</u></p> <p>d) <u>Ensure any infrastructure associated with public footpaths is appropriate for the site and allows for disabled access as far as is practicable;</u></p>	In response to question 190 of the MIQs.
6.7	236	Site Allocations DPD: Site Sheet IP150e: Development constraints/ issues	<p>Modification to Site Sheet IP150e (development constraints/ issues):</p> <p>Access constraints – should be master planned comprehensively with the <u>Ravenswood allocation IP150b through to IP150e and the Airport Farm Kennels site to the south and improvements to this part of the Nacton Road corridor between junction 57 and the Ransomes Way/Nacton Road junction to create an attractive gateway to Ipswich.</u></p>	In response to question 151 of the MIQs.

Site Ref	Address	Q109a - Relationship of the site to the existing settlement and its accessibility to local services / facilities	Q109b - The evidence to support the site's 'deliverability' as defined in Annex 2 of the NPPF?	Q109c - Their viability having regard to the provision of any infrastructure, affordable housing and other policy requirements?	Q111a - confirmed by the landowner involved as being available for the use proposed?	Q11b - supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?	Q111c - deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?
IP003	Waste tip and employment area north of Sir Alf Ramsey Way	<p>Nearest bus stop: 240m</p> <p>Ipswich train station is approximately 650m from the site.</p> <p>Nearest Local Centre; St Matthews Street within 800m</p> <p>District Centre; Norwich Road/Bramford Road within 800m.</p> <p>Nearest schools; St Matthews CofE Primary School 530m</p> <p>Nearest employment area Russell Road Employment Area 150m.</p>	<p>Current status is waste transfer station and temporary consent for second hand vehicle yard, expires 31.3.25. Anticipated for delivery from year 12 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 114 dwellings at 90dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements needed but IBC element will be affordable housing led.</p>	<p>Owned by Ipswich Borough Council and SCC.</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Potential to make access arrangements more pedestrian friendly at low cost (under £100,000).</p>	<p>Contributions will be required given expected number of dwellings (114). Part of site is green corridor along the river. Site is flood zone 2 and 3. Likely to be a contaminated site given previous uses.</p>

IP004	Bus depot, Sir Alf Ramsey Way	Nearest bus stop approx. 100m Ipswich train station approx. 500m Nearest Local Centre; St Matthews Street within 800m District Centre; Norwich Road/Bramford Road within 800m Nearest schools; St Matthews CofE Primary School 600m Nearest employment area; Russell Road Employment Area adjacent.	Current planning status general storage (IP/16/00516/FP13) which expires 29.6.21 when use will return to B2 and B8 use (bus storage workshop). Council has intentions to relocate bus depot in future. Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 48 dwellings at 90dph. Therefore it will likely be 100% flats or flat- led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted or flat- led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements is required but housing will be affordable housing led.	Owned by Ipswich Borough Council.	Confirmed by SCC Highway Engineers that access is safe.	Contributions expected (14 dwellings) Site is area of archaeological importance, flood zone 2 and 3. TPO 01/21 covers many trees. Part of site is river corridor
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IP009	Victoria Nurseries, Westerfield Road	Good relationship to the wider transport network - Nearest bus stop approx 80m Westerfield Road. Nearest local centre; Brunswick Road 900m. Nearest schools; St Margarets CofE Voluntary Aided Primary School 1100m. Nearest employment area; Knightsdale Road/Wharfdale Road 1400m.	Temporary consent as garden nursery and shop ref. 19/01080/FUL expires 31.12. 2020. Anticipated for delivery from year 6 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 12 dwellings at 30dph. Therefore development will likely consist of houses rather than flats. The WPVA identifies the site within the higher value zone of the Borough. Brownfield house developments in the higher value zone were found to be viable in the WPVA. As the capacity is for less than 15 dwellings it would not require affordable housing as per Policy CS12 of the ILPR.	Temporary consent as garden nursery and shop ref. 19/01080/FUL expires 31.12. 2020. Potentially available after expiry. Pre-application enquiry.	Confirmed by SCC Highway Engineers that access is safe.	Deliverable at a low density. No significant environmental or other constraints. TPO tree is in southern corner ref TPO 3 of 1994 and archaeological, contamination and flood risk can be dealt with through appropriate reports/details.
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IP010a	Co-op Depot, Felixstowe Road	Nearest bus stop approx 150m Derby Road train station approx 150m Nearest schools; Rose Hill Primary 250m Nearest employment area; Holywells Close and Holywells Road 1.1km Nearest district centre; Felixstowe Road (55-201, 120-190) 30m.	Vacant brownfield site. Anticipated for delivery from year 8 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 75 dwellings at 45dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the higher value zone of the Borough. House-led brownfield developments in the higher value zone were found to be viable in the WPVA.	Yes - landowner made representations (25677 & 25678) at Preferred Options stage confirming support for allocation for residential development.	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of a link road between Derby Road and Felixstowe Road. Footway widening on Derby Road. Carriageway widening or land for new junction may be required at a total cost of approximately £100,000-£250,000.	Deliverable at a medium density. Contaminated land, noise, ecological and archaeological can be addressed by appropriate reports and details.
IP010b	Felixstowe Road	Nearest bus stop approx 150m Derby Road train station approx 150m Nearest schools; Rose Hill Primary 250m Nearest employment area; Holywells Close and Holywells Road 1.1km Nearest district centre; Felixstowe Road (55-201, 120-190) 30m	Relocation of current site occupiers required before site is deliverable. Many landowners on site. Anticipated for delivery from year 9 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 62 dwellings at 45dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the higher value zone of the Borough. House-led brownfield developments in the higher value zone were found to be viable in the WPVA.	Pre-application enquiry on part of site. Landowner of middle of site commented through adopted Local Plan (2017) consultation.	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of a link road between Derby Road and Felixstowe Road.	Contributions through s106 for bridge, bus stops and real time passenger information screen, and mitigation towards impact with regard to Orwell and Stour Special Protection Area et al required. Wildlife corridor on railway line

IP011a	Lower Orwell Street former Gym & Trim	Nearest bus stop approx 50m Nearest District Centre; Duke Street 650m. Nearest schools; St Helen's Primary School 680m Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road 650m.	Current use is car park and former gym building. Anticipated for delivery from year 6 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 18 dwellings at 110dph. Therefore it will likely be 100% flats. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Vacant site. Previous permission (11/00572/VC) for development as student living accommodation. Pre-application enquiries.	Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of highway widening.	Deliverable at a high density although heritage constraints will limit number of dwellings. Protected trees, likely to be affected by any high density scheme. Contaminated land, archaeological and heritage considerations can be addressed through appropriate reports and detailing.
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IP011b	Smart Street, Foundation Street (South)	Nearest bus stop approx 190m Nearest District Centre; Duke Street 650m Nearest schools; St Helen's Primary School 680m Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road 600m.	Site is occupied by bus depot and car park. Relocation of current site occupier required before site is deliverable. Anticipated for delivery from year 11 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 56 dwellings at 90dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	The landowner made a representation in support of the allocation at Preferred Options (Regulation 18).	Confirmed by SCC Highway Engineers that access is safe.	Site deliverable at high density if bus depot facility relocated. Contributions likely as site expected to provide 112 dwellings. Likely site contamination. Immediately adjacent to two Conservation Areas, and designated and undesignated heritage assets, contains two scheduled monuments and is area of archaeological importance. Area adjacent Star Lane is flood zone 3, majority of remainder of site is flood zone 2 . TPO 2 of 17 for belt of trees on Foundation Street and Star Lane boundary and TPO 12 of 1999 for tree on central northern boundary. Air quality management area to south east boundary.
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IP011c	Smart Street, Foundation Street (North)	Nearest bus stop approx 160m. Nearest District Centre; Duke Street 650m. Nearest schools; St Helen's Primary School 680m. Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road 580m.	Current status is car park, permission expires 6.4.22 (20/120/FP13). Anticipated for delivery from year 8 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 7 dwellings at 90dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flatled brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure and other policy requirements will therefore be required for development of this allocation. As the indicative capacity is for less than 15 dwellings it would not require affordable housing as per Policy CS12 of the ILPR.	Owned by Ipswich Borough Council with existing use on temporary permission.	Confirmed by SCC Highway Engineers that access is safe.	Site is deliverable. See above- development of site would be preferable if linked to IP11b. Constraints, whilst not in site, Central Conservation area is to north of site. There are heritage assets to north and east of the site.
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IP012	Peter's Ice Cream	<p>Nearest bus stop approx 50m Nearest District Centre; Duke Street 480m Nearest schools; St Helen's Primary School 320m. Nearest employment area; Cavendish Street 480m.</p>	<p>Former ice cream factory and distribution business corner building recently demolished. No recent permissions on site. Anticipated for delivery from year 6 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 35 dwellings at 110dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Previous applications for student and residential developments on part of site. Vacated buildings recently demolished, the landowner of this part of the site has confirmed that it is available for development and regards the anticipated delivery date as being reasonable. Temporary car sales permission on part of site expired.</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of footway widening along Star Lane, at low cost (£100,000).</p>	<p>Site deliverability at high density. Contributions expected as site envisaged to provide 53 dwellings. Borders Central Conservation Area to the south. Area of Archaeological importance .Air quality management area to south. Given factory use, contamination maybe an issue</p>
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IP014	Hope Church	Nearest bus stop approx 40m.Nearest local centre; Foxhall Road (25-97, 34-124) 480m and nearest district centre; Duke Street 160m.Nearest schools; St Helen's Primary School 650m.Nearest employment area; Cavendish Street 120m.	PP granted 18/00316/FUL to relocate church to former Odeon. This is currently being implemented. SoCG with Handford Homes (CDL I27) indicates delivery for year 3 of housing trajectory.	The allocation is for 23 dwellings at 110dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements but as an IBC site, will be affordable housing led.	Yes - See SoCG with Handford Homes (CDL I27).	Confirmed by SCC Highway Engineers that access is safe.	Deliverable in medium to long term. Constraints include potential contamination, and air quality issues as within AQMA.
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IP015	West End Road Surface Car Park	Nearest bus stop approx 50m Nearest train station 240m. Nearest local centre; St Matthew's Street 800m Nearest schools; St Matthews CofE 620m. Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road 100m.	Surface level long stay car park. Temporary permission for western part as an overflow car park (19/00076/FPI3) expires 6.3.21. Anticipated for delivery from year 8 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 67 dwellings at 100dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements will therefore be required but as an IBC site it will be affordable housing led.	Yes - See SoCG with IBC as landowner (CDL I26).	Confirmed by SCC Highway Engineers that access is safe.	Site is deliverable and likely to require contributions. Possible contamination-former Maltings to north of site now cou to office and car park. Flood zone 2 and 3. Part of green corridor and river corridor. River path to south and west. River Orwell to south beyond the railway line is a County Wildlife Site. Site's southern boundary is wildlife buffer zone for sites of high to medium nature conservation importance.
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IP031a	Car Park, Burrell Road	Nearest bus stop approx 60m Nearest train station approx 500m. Nearest district center; Within 400m of Wherstead Road District Centre. Nearest schools; Hillside Primary School 500m. Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road 350m.	Site is a rough tarmaced car park. Previously used as garage workshop. Planning permission under 20/160/FUL for continued use of site as car park until 16.4.23. Landowner supportive of redevelopment of site at Preferred Options stage. Anticipated for delivery from year 8 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 20 dwellings at 45dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the low value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Yes - landowner made representations (25675) at Preferred Options stage confirming support for allocation for residential development although would prefer mixed use with car park & hotel in addition.	Confirmed by SCC Highway Engineers that access is safe. Likley access mitigation required at low cost (under £100,000).	Site is deliverable for 20 dwellings at medium density and likely to require contributions. Stoke Conservation Area forms eastern boundary and is across road from site. Grade 1 St. Mary Stoke Church is across road from site. In view of Stoke Bridge Maltings, 4 College Street (grade 2) and St Peters Church grade 2*.) Potential contamination given previous use. County Wildlife Site on river Orwell to north. Majority of site (other than south eastern corner) is in flood zone 2 and 3. Area of archaeological importance to eastern half.
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IP031b	22 Stoke Street	<p>Nearest bus stop approx 60m</p> <p>Nearest train station approx 500m.</p> <p>Nearest district center; Within 400m of Wherstead Road District Centre.</p> <p>Nearest schools; Hillside Primary School 500m.</p> <p>Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road 350m.</p>	<p>Planning permission (19/00369/FUL) was recently granted on this site for a residential development.</p> <p>Anticipated for delivery from year 2 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 18 dwellings at 100dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Planning permission (19/00369/FUL) was recently granted on this site for a residential development.</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Likely access mitigation required at low cost (under £100,000).</p>	<p>Extant permission for 31 flats (19/00369 refers). Deliverable as a high density development subject to conditions and obligations being met.</p>
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IP032	King George V Field, Old Norwich Road	Nearest bus stop approx 160m. Nearest district centre; Meredith Road 650m. Nearest schools; Whitehouse Community Primary School 600m. Nearest employment area; Ipswich Business Park and White House Industrial Estate 160m.	Currently used as playing fields. Development dependent on alternative replacement provision being provided in local area. Permission granted in Mid Suffolk District (reference 0254/13) for replacement pitches but not yet implemented. Landowner has raised no objection to principle of development at Final Draft stage of ILPR. Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 99 dwellings at 35dph. Therefore development will likely consist of houses rather than flats. The WPVA identifies the site within the higher value zone of the Borough. Greenfield house-led developments in the higher value zone were found to be viable in the WPVA.	Yes - The landowner has made a representation (26193) at Final Draft stage confirming no objection to principle of residential development.	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of pedestrian and cycle link to Anglia Retail Park/Whitehouse employment site and controlled or left out access with Toucan crossing on Bury Road, likely cost medium (£250,000-£100,000) to high value (more than £250,000).	Site deliverable subject to replacement playing field being found. Low density development. Contributions likely given expected site size. Public right of way on west boundary. TPO on south west boundary. Whitton Conservation Area to north of site.
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IP033	Land at Bramford Road (Stocks site)	<p>Nearest bus stop approx 113m on Bramford Road.</p> <p>Nearest train station approx 2414m.</p> <p>Nearest local center; Bramford Road (560 and 651-677) (322m).</p> <p>Nearest schools; Springfield Infant School and Nursery (225m) and Westbourne Academy (917m).</p> <p>Nearest employment area; Boss Hall Industrial Estate (322m)</p>	<p>No recent discussions/permissions for development of site.</p> <p>Anticipated for delivery from year 7 in housing trajectory (CDL D52).</p>	<p>The allocation is for 55 dwellings at 55dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led greenfield developments in the lower value zone were found to be viable in the WPVA.</p>	<p>Site vacant and available for development.</p>	<p>Mitigation required to make through traffic impact on Jovian Way safe. Medium cost (£250,000-£100,000).</p>	<p>Deliverable in long term. Constraints include archaeology, contamination, and ecology.</p>
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IP035	Key Street / Star Lane / Burtons (St Peter's Port)	Nearest bus stop approx 150m. Nearest district center; Wherstead Road 480m. Nearest schools; Hillside Primary School 800m. Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road 650m.	Landowner has supported principle of residential development throughout ILPR stages. Planning permission (07/00555/FUL) has previously been granted but since expired. Anticipated for delivery from year 7 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 86 dwellings at 200dph. Therefore it will likely be 100% flatted. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Yes - Landowner has made representations (26566) through ILPR stages confirming no objection to principle of residential development.	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of new and/or relocated Tocan crossing at high cost (more than £250,000).	Deliverable in long term. Constraints include archaeology, heritage, flood risk, contamination, air quality.
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IP037	Island Site	<p>Nearest bus stop approx 322m on Vernon Street. Nearest train station approx 966m. Nearest local center; Grimwade Street (483m) and nearest district center; Wherstead Road (402m). Nearest schools; Hillside Primary School (805m) and Stoke High School – Ormiston Academy (1159m). Nearest employment area; Felaw Maltings/IP-City (322m).</p>	<p>Informal discussions with landowner have taken place. Landowner has supported principle of residential development throughout ILPR stages. Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 421 dwellings at 100dph. Therefore it will likely be 100% flatted or flat-led. The WPVA identifies the site within the lower value zone of the Borough. A specific viability assessment for this allocation was undertaken in the WPVA and was found to be unviable. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Yes - Landowner has made representations (26656) through ILPR stages confirming no objection to principle of residential led development we are developing a SoCG with site owners.</p>	<p>Mitigation required to make access safe. Mitigation to take the form of a new vehicle, pedestrian and cycle access at very high cost (more than £1,000,000). Funding commitment for £10.8 million has been secured through ISPA and SCC Infrastructure SoCG.</p>	<p>Deliverable in long term. Constraints include archaeology, heritage, flood risk, contamination. Existing uses would need to be relocated.</p>
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IP039a	Land between Gower Street & Gt Whip Street	<p>Nearest bus stop approx 48m on Vernon Street.</p> <p>Nearest train station approx 644m.</p> <p>Nearest local center; Grimwade Street (644m) and nearest district center; Wherstead Road (322m).</p> <p>Nearest schools; Hillside Primary School (660m) and Stoke High School – Ormiston Academy (982m).</p> <p>Nearest employment area; Felaw Maltings/IP-City (402m).</p>	<p>No discussions with land owner about redevelopment.</p> <p>Anticipated for delivery from year 13 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 45 dwellings at 95dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements however IBC element will be will therefore beaffordable housing led.</p>	<p>Site partially owned by Ipswich Borough Council.</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe be required in the form of traffic control to Little Whip Street/Vernon Street junction at low cost (under £100,000).</p>	<p>Deliverable in long term. Constraints include archaeology, heritage, flood risk. Existing uses would need to be relocated.</p>
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IP040	Former Civic Centre, Civic Drive (Westgate)	Nearest bus stop approx 113m on Civic Drive. Nearest train station approx 805m. Nearest local center; St Matthews Street (161m) and nearest district center; Norwich Road/Bramford Road. Nearest schools; St Matthews CofE (209m) and Stoke High School – Ormiston Academy (1561m). Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road (322m).	There is planning permission for a temporary car park (18/00773/VC) expires 31.3.2031. Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 59 dwellings at 90dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flatled brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements will therefore be required but as IBC owned, housing will be affordable housing led.	Yes - See SoCG with IBC as landowner (CDL I26).	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of vehicular access from Civic Drive roundabout through to Black Horse Lane at medium cost (£250,000-£100,000).	Deliverable in long term. Constraints include archaeology and heritage.
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IP041	Former Police Station, Civic Drive	<p>Nearest bus stop approx 161m on Civic Drive.</p> <p>Nearest train station approx 805m.</p> <p>Nearest local center; St Matthews Street (257m) and nearest district center; Norwich Road/Bramford Road (451m).</p> <p>Nearest schools; St Matthews CofE (209m) and Stoke High School – Ormiston Academy (1561m).</p> <p>Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road (241m).</p>	<p>Planning Permission for temporary car park (18/00225/FPI3) expires 31.3.2021. Anticipated for delivery from year 6 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 58 dwellings at 110dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements will be needed but IBC housing will be affordable housing led.</p>	<p>Yes - See SoCG with IBC as landowner (CDL I26).</p>	<p>Confirmed by SCC Highway Engineers that access is safe.</p>	<p>Deliverable in long term. Constraints include archaeology and heritage.</p>
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IP043	Commercial Buildings, Star Lane	Nearest bus stop approx 483 on Fore Street Nearest train station approx 966m. Nearest local center; Grimwade Street (241m) and nearest district center; Duke Street (579m). Nearest schools; St Helens Primary (724m) and Stoke High School – Ormiston Academy (1255m). Nearest employment area; Cavendish Street (644m).	Planning Permission 11/00267/FUL has lapsed. Anticipated for delivery from year 7 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 50 dwellings at 90dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Landowner supported principle of residential development at relevant stages of adopted Local Plan (2017).	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of pedestrian/cycle crossing at medium cost (£250,000-£100,000).	Deliverable as a high density site in the long term given need to compile application and temporary permission for car park. Matters relating to air quality, flood risk and heritage impact can be addressed through appropriate reports and detailing.
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IP047	Land at Commercial Road	<p>Nearest bus stop approx 274m on Princes Street.</p> <p>Nearest train station approx 483m.</p> <p>Nearest local center; Grimwade Street (885m) and nearest district center; Duke Street (1078m).</p> <p>Nearest schools; Hillside Primary School (499m) and Stoke High School – Ormiston Academy (837m).</p> <p>Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road (322m).</p>	<p>Current pending application 19/00148/FUL for 173 dwellings. Anticipated for delivery from year 3 in housing trajectory (CDL D52).</p>	<p>The allocation is for 173 dwellings at 55dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Yes - There is a pending planning application (19/00148/FUL) for 173 dwellings.</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of access to Princess Street at medium cost (£250,000-£100,000).</p>	<p>Current application under consideration for 173 dwellings (19/00148/OUT refers) although issues with regard to viability and required infrastructure. Deliverable short to medium term.</p>
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IP048a	Mint Quarter / Cox Lane East regeneration area	Nearest bus stop approx 80m on Tacket Street. Nearest train station approx 1127m. Nearest local center; Woodbridge Road (241m) and nearest district center; Wherstead Road (966m). Nearest schools; St Margarets CofE (402m) and Stoke High School – Ormiston Academy (1609m). Nearest employment area; Cavendish Street (966m).	Anticipated for delivery from year 8 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 53 dwellings at 100dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flatled brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Yes - See SoCG with IBC as landowner (CDL I26). Department for Education and Suffolk County Council supportive of primary education use on site.	Confirmed by SCC Highway Engineers that access is safe. Mitigation in the form of a transport assessment, low residential car parking and car club required at high cost (more than £250,000).	Current application for redevelopment of part of site for 18 dwellings (20/00006/FUL) under consideration. This is deliverable in short to medium term subject to S106 Agreement and conditions/obligations being met. Applicant has submitted viability report which is currently under consideration as part of S106 negotiation.
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IP048b	Mint Quarter / Cox Lane West regeneration area	<p>Nearest bus stop approx 161m on Tacket Street.</p> <p>Nearest train station approx 1226m.</p> <p>Nearest local center; Woodbridge Road (322m) and nearest district center; Wherstead Road (966m).</p> <p>Nearest schools; St Margarets CofE (402m) and Stoke High School – Ormiston Academy (1609m).</p> <p>Nearest employment area; Cavendish Street (966m).</p>	NCP car park recently approved for temporary planning permission (20/00691/FUL) until 23.9.2022. Anticipated for delivery from year 9 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 36 dwellings at 90dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flatled brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Landowner for part of site has supported principle of residential on part of this site through SHELAA response.	Confirmed by SCC Highway Engineers that access is safe. Mitigation in the form of a transport assessment, low residential car parking and car club required at high cost (more than £250,000).	Part of site deliverable short to medium term. NCP car park site likely long term given number of temp pp having been granted. Adoption of Parking Strategy may help delivery these sites once permanent capacity for car parks is reached. Constraints include archaeology and heritage.
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IP054b	Land between Old Cattle Market and Star Lane	Nearest bus stop approx 161m on Dogs Head Street. Nearest train station approx 724m. Nearest local center; Grimwade Street (483m) and nearest district center; Duke Street (885m). Nearest schools; St Matthews CofE (644m) and Stoke High School – Ormiston Academy (1304m). Nearest employment area; Civic Drive/Princes Street/Russell Road/Portman Road (563m)	Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 40 dwellings at 60dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Yes - Some of landowners have submitted representations (26241 & 26319) at Final Draft stage and raised no objection to principle of residential development.	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of signalisation of Turret Lane and Star Lane pedestrian crossing at medium cost (£250,000-£100,000).	Deliverable in long term. Existing businesses would need to be relocated. Constraints include archaeological, heritage, flooding and TPO trees. Also within AQMA.
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IP061	Former School Site, Lavenham Road	<p>Nearest bus stop approx 161m on London Road.</p> <p>Nearest train station approx 1287m.</p> <p>Nearest local center; Dickens Road (322m).</p> <p>Nearest schools; Ranelagh Primary School (434m) and Chantry Academy (998m).</p> <p>Nearest employment area; Hadleigh Road Industrial Estate (676m).</p>	<p>Site is owned by Suffolk County Council and has been partially developed. Anticipated for delivery from year 5 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 23 dwellings at 40dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led greenfield developments in the lower value zone were found to be viable in the WPVA.</p>	<p>Yes - Site is owned by Suffolk County Council and has been partially developed. No objection raised to principle of residential development.</p>	<p>Confirmed by SCC Highway Engineers that access is safe.</p>	<p>Deliverable in medium to long term. Constraints include possible archaeological issues and setting of listed building.</p>
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IP064a	Land between Holywells Road and Holywells Park	Nearest bus stop / station: 100m Nearest shops: 315m Nearest Employment: The site is adjacent to existing employment area. Nearest schools: 380m cliff lane primary The site is within 400m of the Duke Street District Center and Cliff Lane Local Centre	Employment use currently occupied. Anticipated for delivery from year 7 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 66 dwellings at 45dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Landowner has made representation (26509) at Preferred Options Stage in support of principle of residential development and the medium term likely timescale.	Confirmed by SCC Highway Engineers that access is safe.	Deliverable in long term. Constraints include proximity to county wildlife site Holywells Park, and flood risk. Requirement for existing uses to be relocated.
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IP066	JJ Wilson and land to rear at Cavendish Street	<p>Nearest bus stop / station: 20m</p> <p>Nearest shops: 180m</p> <p>Nearest Employment: The site is adjacent to existing employment area</p> <p>Nearest schools: 750m cliff lane primary. Suffolk New College and University of Suffolk within 450m.</p>	Informal discussions with landowner have taken place. Anticipated for delivery from year 5 in housing trajectory (Matter Statement 3 Trajectory).	<p>The allocation is for 55 dwellings at 65dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	The Council has been in discussions with the landowners regarding the future development of the site.	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of traffic regulation order and footway improvements at low cost (less than £100,000).	Deliverable in long term. Constraints include possible contamination and a requirement for existing uses to be relocated.
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IP067a	Former British Energy Site	Nearest bus stop / station: 150m Nearest shops: 910m Nearest Employment: 200m Nearest schools: 680m Pipers vale Nearest district/ local centre: Reynolds Road Local Centre 910m.	Anticipated for delivery from year 13 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 17 dwellings at 45dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Landowner requested residential allocation through consultation on adopted Local Plan, explaining that there has been previous interest from residential developers.	Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of cycle/pedestrian link to Sandyhill Lane at low cost (less than £100,000).	Deliverable in long term. Constraints include noise from port activity and A14, odour from sewage works. Contamination and ecological issues. Adj to County wildlife site.
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IP080	240 Wherstead Road	Nearest bus stop / station: 55m Nearest shops: 680m Nearest Employment: 200m Nearest schools: stoke high 250m Nearest district/ local centre: Within 800m Wherstead Road District Centre and within 400m Maidenhall Green Local Centre.	Outline planning permission granted under 06/00872/OUT but expired. Anticipated for delivery from year 6 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 27 dwellings at 55dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Landowner engaged through SHELAA confirming site will be released for development.	Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of north vehicular access at low cost (less than £100,000).	Deliverable in long term. Possible contamination, flood risk and archaeological issues. Noise from railway a constraint. Also wildlife corridor.
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IP089	Waterworks Street	<p>Nearest bus stop / station: 50m Nearest shops: 80m Nearest Employment: 170m Nearest schools: 450m St Helens Primary School. Within 400m Suffolk New College and University of Suffolk.</p> <p>Nearest district/ local centre: Within 400m of Duke Street District Centre and 400m St Helens Street Local Centre.</p>	Anticipated for delivery from year 12 in housing trajectory (Matter Statement 3 Trajectory).	<p>The allocation is for 23 dwellings at 90dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	Landowner has made representation (26580) at Preferred Options Stage in support of principle of residential development.	Confirmed by SCC Highway Engineers that access is safe.	Deliverable in long term. Possible contamination issues and heritage issues with conservation area and listed building. Archaeology main constraint.
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IP096	Car Park Handford Road East	Nearest bus stop / station: 60m Nearest shops: 440m Lidl Nearest Employment: 350m Nearest schools: 200m St Matthews Nearest district/ local centre: Within 400m Norwich Road District Centre and 400m St Matthews Local Centre.	Planning permission (19/00768/FUL) was recently granted on this site for a residential development. Anticipated for delivery from year 3 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 22 dwellings at 100dph. Therefore it will likely be 100% flats or flat- led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted or flat- led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Planning permission (19/00768/FUL) was recently granted on this site for a residential development.	Confirmed by SCC Highway Engineers that access is safe.	Planning permission granted for 22 specialised dwellings within Use Class C3. Deliverable in the short term subject to obligations/conditions being met.
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IP098	Transco, south of Patteson Road	Nearest bus stop / station: 110m Nearest shops: 220m Nearest Employment: 170m Nearest schools: Cliff Lane Primary 550m Nearest district/ local centre: Within 400m Duke Street District Centre.	Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 62 dwellings at 110dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Informal discussions with landowner in 2010.	Confirmed by SCC Highway Engineers that access is safe.	Deliverable in long term. Contamination issues regarding existing use. County wildlife site (river) in close proximity. Archaeological and flood risk constraints.
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IP105	Depot, Beaconsfield Road	Nearest bus stop / station: 260m Nearest shops: 335m Sidar Road Nearest Employment: 200m Whittle Road Nearest schools: 200m Handford Primary Nearest district/ local centre: Within 800m Norwich Road District Centre and 400m Bramford Road Local Centre.	Temp planning permission granted (18/00908/FUL) for workshop until 1.12.2020. Anticipated for delivery from year 9 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 15 dwellings at 45dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Landowner has engaged through the SHELAA confirming that there is only one occupier on a short-term lease. Once the tenant vacates then they have indicated it may be redeveloped in the short term.	Confirmed by SCC Highway Engineers that access is safe.	Deliverable in long term. Contamination issues regarding existing use. County wildlife site (river) in close proximity. Archaeological and flood risk constraints.
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IP119	Land east of West End Road	Nearest bus stop / station: 400m/800m Ipswich train Nearest shops: 185 Lidl Nearest Employment: 675 Ipswich industrial estate Nearest schools: 600m Handford Primary Nearest district/ local centre: Within 800m Norwich Road District Centre.	Anticipated for delivery from year 13 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 28 dwellings at 125dph. Therefore it will likely be 100% flatted. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements will be required but as IBC owned housing will be affordable housing led.	Site is owned by Ipswich Borough Council.	Confirmed by SCC Highway Engineers that access is safe.	Deliverable in long term. Contamination issues regarding existing use. County wildlife site (river) in close proximity.
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IP120b	Land west of West End Road	<p>Nearest bus stop / station: 400m/800m Ipswich train</p> <p>Nearest shops: 200m Lidl</p> <p>Nearest Employment: 700 Ipswich industrial estate</p> <p>Nearest schools: 620m Handford Primary.</p> <p>Nearest district/ local centre: Within 800m Norwich Road District Centre.</p>	Anticipated for delivery from year 11 in housing trajectory (Matter Statement 3 Trajectory).	<p>The allocation is for 103 dwellings at 125dph. Therefore it will likely be 100% flatted. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements will be required but as IBC owned housing will be affordable housing led.</p>	Site is owned by Ipswich Borough Council.	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of improvements to existing pedestrian access and pedestrian refuge(s) to cross WER at medium cost (£250,000-£100,000).</p>	Deliverable in long term. Contamination issues regarding existing use. County wildlife site (river) in close proximity.
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IP125	Corner of Hawke Road and Holbrook Road	<p>Nearest bus stop / station: 120m Holbrook Rd Nearest shops: 760m Landseer road Nearest Employment: 220m Sandhill lane Nearest schools: 550m pipers vale Nearest district/ local centre: 735m from Reynolds Road Local Centre.</p>	<p>SoCG with landowner for delivery in first 5 years of plan period. Anticipated for delivery from year 4 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 15 dwellings at 60dph. Therefore development will likely be 100% houses or house-led. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, and other policy requirements will be required but as IBC owned , housing will be affordable housing led.</p>	<p>Yes - See SoCG with Handford Homes (CDL I27).</p>	<p>Development will make use of existing access which may require improvement.</p>	<p>Deliverable in medium to long term. Contamination issues regarding existing use.</p>
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IP132	Former St Peters Warehouse Site, 4 Bridge Street	Nearest bus stop / station: 170m Bridge Street Nearest shops: 150m town centre Nearest Employment: 150m Cardinal Park Nearest schools: 735m Hillside Primary Nearest district/ local centre: Within 800m Wherstead Road District Centre.	Temporary planning permission (20/00412/FPI3) for car park until 31.8.2022. Anticipated for delivery from year 8 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 73 dwellings and will likely be 100% flatted. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, and other policy requirements will be required but as IBC owned , housing will be affordable housing led.	Site owned by Ipswich Borough Council.	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of formalised vehicle access, car club and low parking provision. Medium cost value (£250,000-£100,000).	Deliverable in medium to long term. Archaeology a major constraint. Site close to county wildlife site (River Orwell). Needs to be master planned with adj sites. Conservation area and listed building issues.
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IP133	South of Felaw Street	<p>Nearest bus stop / station: 100m Hawes Street/ station 910m Nearest shops: 170m COOP Nearest Employment: 550m Riverside industrial park & adjacent to existing employment area. Nearest schools: 617m Hillside Primary. Nearest district/ local centre: Within 400m of Wherstead Road District Centre.</p>	<p>Site partially owned by Ipswich Borough Council. Previous permission (10/00418/VC) for residential development since expired. Anticipated for delivery from year 9 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 45 dwellings at 120dph. Therefore it will likely be 100% flatted. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Previous permission (10/00418/VC) for residential development since expired. Site partially owned by Ipswich Borough Council. Pre-application enquiry received on the portion not owned by IBC. The agent acting on behalf of the landowner has confirmed that they are continuing to progress the site.</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form pedestrain crossing improvements at low cost (£100,000).</p>	<p>Deliverable in medium to long term but need comprehensive scheme. Site close to county wildlife site (River Orwell)</p>
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IP135	112-116 Bramford Road	<p>Nearest bus stop / station: 40m Bramford Rd</p> <p>Nearest shops: The site is shops</p> <p>Nearest Employment: 610m Ipswich industrial estate</p> <p>Nearest schools: 560m Springfield Juniors</p> <p>Nearest district/ local centre: Within 800m of Norwich Road District Centre and 400m Bramford Road Local Centre.</p>	<p>Part of site temporary planning permission in place for car wash until 1.10.21 (19/00677/FUL) and car sales 5.11.2020 (18/00807/ful).</p> <p>Anticipated for delivery from year 5 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 19 dwellings at 110dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatled or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Previous permission (11/00247/VC) for residential development since expired. Application 14/00668/OUT for 15 dwellings withdrawn.</p>	<p>Confirmed by SCC Highway Engineers that access is safe.</p>	<p>Deliverable in medium to long term. TPO within the site.</p>
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IP136	Silo, College Street	<p>Nearest bus stop / station: 170m Bridge Street Nearest shops: 150m town centre Nearest Employment: 150m Cardinal Park Nearest schools: 735m Hillside Primary Nearest district/ local centre: Within 800m Wherstead Road District Centre.</p>	<p>Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 73 dwellings and will likely be 100% flatted. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Landowner supported principle of residential development at relevant stages of adopted Local Plan (2017).</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of formalised vehicular access, car club and fewer car parking spaces at low cost (£100,000).</p>	<p>Deliverable in medium to long term. Archaeology a major constraint. Site close to county wildlife site (River Orwell). Needs to be master planned with adj sites. CA and LB issues.</p>
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IP143	Former Norsk Hydro, Sandyhill Lane	<p>Nearest bus stop / station: 90m Nearest shops: 770m Nearest Employment: Adjacent to existing employment area. Nearest schools: 520m Cliff Lane Primary School Nearest district/ local centre: 750m from Cliff Lane Local Centre.</p>	<p>Planning permission granted October 2019 (17/00769/OUT). SoCG with landowner. Anticipated for delivery from year 3 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 85 dwellings based on permission 17/00769/OUT and will likely be 100% houses. The WPVA identifies the site within the lower value zone of the Borough. House-led greenfield developments in the lower value zone were found to be viable in the WPVA. The permission did identify contamination concerns related to this site specifically which may require a flexible approach to infrastructure and affordable housing.</p>	<p>Yes - See SoCG with landowner (CDL I24.1)</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of pedestrian crossing on Landseer Road and cycle lane on Sandy Hill Lane at medium cost (£250,000-£100,000).</p>	<p>This is deliverable in short to medium term subject to S106 Agreement and conditions/obligations being met. Constraints include noise from port activity and A14, odour from sewage works. Contamination a major issue.</p>
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IP150d	Land south of Ravenswood – Sports Park	Nearest bus stop / station: 10m Nearest shops: 420m Nearest Employment: 450m Ransomes Europark Nearest schools: 435m Ravenswood Primary Nearest district/ local centre: Within 400m of Ravenswood District Centre.	SoCG with landowner. Anticipated for delivery from year 8 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 34 dwellings and will likely consist of houses rather than flats. The WPVA identifies the site within the higher value zone of the Borough. Greenfield house-led developments in the higher value zone were found to be viable in the WPVA.	Yes - See SoCG with IBC as landowner (CDL 126).	Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required to address access constraints.	Deliverable in medium to long term.
IP150e	Land south of Ravenswood	Nearest bus stop / station: 10m Nearest shops: 210m Nearest Employment: 150m Ransomes Europark Nearest schools: 460m Ravenswood Primary Nearest district/ local centre: Within 400m of Ravenswood District Centre.	SoCG with landowner. Anticipated for delivery from year 5 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 126 dwellings and will likely consist of houses rather than flats. The WPVA identifies the site within the higher value zone of the Borough. Greenfield house-led developments in the higher value zone were found to be viable in the WPVA.	Yes - See SoCG with IBC as landowner (CDL 126).	Confirmed by SCC Highway Engineers that access is safe. Mitigation required in the form of footway improvements along perimeter track. Mitigation value medium (£250,000-£100,000).	Deliverable in medium to long term

IP172	15-19 St Margaret's Green	<p>Nearest bus stop / station: 40m Nearest shops: 375m Tower Ramparts Nearest Employment: 400m from town centre Nearest schools: St Margarets Primary 100m. Nearest distirct/ local centre: Within town centre and within 400m Woodbridge Road Local Centre.</p>	<p>Medium to long term given the need to compile application and temporary permission for existing car wash use until October 2022. Anticipated for delivery from year 7 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 9 dwellings at 110dph. Therefore it will likely be 100% flats. The WPVA identifies the site within the higher value zone of the Borough. 100% flatted brownfield developments in the higher value zone were found not to be viable in the WPVA. A flexible approach to infrastructure and other policy requirements will therefore be required for development of this allocation. As the allocaiton is less than 15 dwellings it would not require affordable housing as per Policy CS12 of the ILPR.</p>	<p>Previous permission (08/00511/FUL) for student use development but expired. Temporary car wash permission expired. Potentially available for development.</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of access constaints and AQMA appropriate building design, low cost (less than £100,000).</p>	<p>Deliverable as a high density development. Matters relating to air quality, contamination, heritage impacts can be addressed by appropriate report.</p>
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IP188	Websters Saleyard site, Dock Street	Nearest bus stop / station: 45m Nearest shops: 100m Nearest Employment: 250m Felaw Maltings Existing Employment Area. Nearest schools: 660m Hillside Primary. Nearest district/ local centre: Within 400m of Wherstead Road District Centre.	Planning Permission granted (19/00173/FUL) for 9 dwellings. Anticipated for delivery from year 5 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 9 dwellings and will likely be 100% flats. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure and other policy requirements will therefore be required for development of this allocation. As the allocation is less than 15 dwellings it would not require affordable housing as per Policy CS12 of the ILPR.	Planning permission (19/00173/FUL) was recently granted on this site for a residential development.	Confirmed by SCC Highway Engineers that access is safe. Mitigation may be required in the form of footway improvement, low cost (less than £100,000).	Site currently being marketed. This is deliverable in short to medium term subject to conditions being met. County wildlife site adjacent site (River Orwell).
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IP221	Flying Horse PH, 4 Waterford Road	<p>Nearest bus stop / station: 100m</p> <p>Nearest shops: 200m</p> <p>Nearest Employment: 450m Whitehouse</p> <p>Nearest schools: 175m Whitehouse Primary / Westbourne 300m</p> <p>Nearest district/ local centre: Within 800m of Meredith Road District Centre and 400m of Ulster Avenue Local Centre.</p>	<p>Planning Permission granted (06/01007/FUL) for 12 dwellings but expired. Anticipated for delivery from year 10 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 12 dwellings at 35dph. Therefore development will likely be 100% houses rather than flats. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure and other policy requirements will therefore be required for development of this allocation. As the allocation is less than 15 dwellings there would be no affordable requirement as per Policy CS12 of the</p>	<p>Planning Permission granted (06/01007/FUL) for 12 dwellings but expired. Site vacant and available. IBC owned.</p>	<p>Confirmed by SCC Highway Engineers that access is safe.</p>	<p>Deliverable in long term. TPO on or in close proximity to site.</p>
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				<p>ILPR. However as an IBC owned site this is likely to include affordable housing.</p>				
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IP279B(1)	Land north of Former British Telecom Office, Bibb Way	Nearest bus stop / station: 15m Nearest shops: 260m Nearest Employment: 280m Russel Road Employment Area Nearest schools: St Matthews 370m Nearest district/ local centre: Within 400m Norwich Road District Centre.	Prior approval granted under 18/00470/P3JPA for conversion of building to residential. SoCG with new owner. Anticipated for delivery from year 3 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 18 dwellings at around 40dph and will likely be houses rather than flats. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, and other policy requirements will be required but IBC propose this site will be 100% affordable housing.	Yes - See SoCG with Ipswich Borough Assets (CDL I25)	Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of access constraints from Handford Road, low cost (less than £100,000).	Deliverable in long term. Constraints to development and the need to improve pedestrian routes through to south of site will be a constraint if different developers. Site close to county wildlife site and local nature reserve.
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IP279B(2)	Land south of Former British Telecom Office, Bibb Way	<p>Nearest bus stop / station: 100m</p> <p>Nearest shops: 350m</p> <p>Nearest Employment: 280m Russel Road Employment Area</p> <p>Nearest schools: St Matthews 190m</p> <p>Nearest district/ local centre: Within 800m Norwich Road District Centre.</p>	<p>Prior approval granted under 18/00470/P3JPA for conversion of building to residential. SoCG with new owner. Anticipated for delivery from year 4 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 29 dwellings at around 48dph and will likely be houses rather than flats. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, and other policy requirements will be required but as IBC owned will be affordable housing led.</p>	<p>Yes - See SoCG with Ipswich Borough Assets (CDL I25)</p>	<p>Confirmed by SCC Highway Engineers that access is safe. Mitigation maybe required in the form of access constraints from Hanford Road, low cost (less than £100,000).</p>	<p>Deliverable in long term. Constraints to development and the need to improve pedestrian routes through to Ipswich Village will be a constraint. Site close to county wildlife site and local nature reserve.</p>
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IP307	Prince of Wales Drive	<p>Nearest bus stop / station: 5m Nearest shops: 250m Nearest Employment: West Bank Terminal 670m Nearest schools: Halifax Primary 80m Stoke High 440m. Nearest district/ local centre: Within 800m Stoke Park Drive District Centre & within 400m Maidenhall Green Local Centre.</p>	<p>Pending application (20/00367/FUL) for residential development. Anticipated for delivery from year 2 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 12 dwellings at 45dph and will likely be houses rather than flats. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA., except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure and other policy requirements will therefore be required for development of this allocation. As the allocation is for less than 15 dwellings, affordable housing will not be required as per Policy CS12 of the ILPR.</p>	<p>Pending application (20/00367/FUL) for residential development.</p>	<p>Confirmed by SCC Highway Engineers that access is safe.</p>	<p>Deliverable in short to medium term subject to pp and obligations/conditions being met.</p>
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IP309	Former Bridgeward Social Club, 68a Austin Street	<p>Nearest bus stop / station: 75m/ 635m Ipswich train station</p> <p>Nearest shops: 70m</p> <p>Nearest Employment: Felaw Maltings Employment Area 230m</p> <p>Nearest schools: Hillside Primary 410m</p> <p>Nearest district/ local centre: Within 400m Wherstead Road District Centre.</p>	<p>Application for development of part of the site withdrawn under 19/00143/FUL as comprehensive development required to take into account access requirements. Anticipated for delivery from year 4 in housing trajectory (Matter Statement 3 Trajectory).</p>	<p>The allocation is for 15 dwellings at 55dph and will likely be houses rather than flats. The WPVA identifies the site within the lower value zone of the Borough. House-led brownfield developments in the lower value zone were found to be unviable in the WPVA, except for where lower affordable housing and/or section 106 contributions were sought in the testing. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.</p>	<p>Yes - The landowner has made a representation (26344) at Final Draft stage supporting principle of residential development and confirming immediate availability.</p>	<p>Access challenging onto Austin Street due to limited visibility splay. Potential for alternative access in principle though so not insurmountable.</p>	<p>Deliverable in long term as a medium density site. Matters relating to access and ecology can be addressed through appropriate reports and details.</p>
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IP354	72 (Old Boatyard) Cullingham Road	Nearest bus stop / station: 200m Nearest shops: 160m Nearest Employment: 260m Russell Road Employment Area. Nearest schools: 400m Ranleigh Primary Nearest district/ local centre: Within 800m Norwich Road District Centre.	Informal discussions with landowner. Anticipated for delivery from year 3 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 24 dwellings at 70dph. Therefore it will likely be 100% flats or flat-led. The WPVA identifies the site within the lower value zone of the Borough. 100% flat-led or flat-led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure, affordable housing and other policy requirements will therefore be required for development of this allocation.	Informal discussions with landowner. Pre-application enquiry.	No objection from SCC highways engineers regarding safe access. Existing access from Cullingham Road.	Deliverable in long term as a high density site although constraints to development and the need to improve pedestrian routes through to Portman Quarter will be a constraint and limit upon storey heights and amount of development. Site close to county wildlife site and local nature reserve.
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IP355	77-79 Cullingham Road	Nearest bus stop / station: 220m Nearest shops: 190m Nearest Employment: 240m Russell Road Employment Area. Nearest schools: 500m Ranleigh Primary Nearest district/ local centre: Within 800m Norwich Road District Centre.	Informal discussions with landowner. Anticipated for delivery from year 3 in housing trajectory (Matter Statement 3 Trajectory).	The allocation is for 6 dwellings at 100dph. Therefore it will likely be 100% flats or flat- led. The WPVA identifies the site within the lower value zone of the Borough. 100% flatted or flat- led brownfield developments in the lower value zone were found not to be viable in the WPVA. A flexible approach to infrastructure and other policy requirements will therefore be required for development of this allocation. As the allocation is for less than 15 dwellings there would be no affordable housing requirement as per Policy CS12 of the ILPR.	Yes - The landowner has made a representation (26344) at Final Draft stage supporting principle of residential development.	No objection from SCC highways engineers regarding safe access. Existing access from Cullingham Road. Site would facilitate pedestrian/ cycle link from IP279b to Cullingham Road and river path.	Deliverable in long term at a density of 100dph. Site is adjacent to Local Nature reserve and County Wildlife site. Contributions to secure funding for improvements to Alderman Canal odour are expected along with contribution to provide bridge across canal to link to riverside walk
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