Ipswich Borough Council Local Plan Review 2018 – 2036

Response to Matter 7 – IP-One Area Action Plan

Issue: Whether the AAP for the IP-One Area is sound, in terms of whether the policies and proposals are positively prepared, justified, effective and consistent with national policy? Has the ILPR been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for employment and business needs for the period 2018-2036?

November 2020

195. Is Policy CS3 of the CSP clear that the AAP has been prepared and is contained within the Site Allocations and Policies DPD, as proposed by the Council in its SoCG with Historic England [I30.1]?

Through the Historic England SoCG,(CDL I30.1)[1] the Council agreed to amend Policy CS3 of the CSP DPD to clarify that work on the IP-One Area Action Plan has been completed and is incorporated in the Site Allocations and Policies Plan Document. The Council consider that the text changes proposed clarify the status of the AAP.

196. Is it clear which policies and site allocations in the ILPR comprise the IP-One Area Action Plan?

The ILPR incorporates the key elements of the IP-One Area Action Plan which is a strategy for urban regeneration. The IP-One Area is indicated on Figure 1 of the Site Allocations and Policies DPD and includes the Waterfront, Portman Quarter, the Education Quarter and the town centre. The IP-One Area Action Plan was seamlessly merged with the Site Allocations and Policies DPD, as part of the preparation of the adopted Ipswich Local Plan. It has informed the broad focus of the Plan in terms of development to achieve appropriate regeneration of the central core (IP-One Area). This approach has been carried forward into ILPR with its strategy of urban renaissance. As such, it is not considered necessary or appropriate to indicate which policies and site allocation comprise the IP-One Area Action Plan.

197. Is the overall spatial strategy for the IP-One Area clearly written and unambiguous and is it justified as an appropriate strategy for the central area of Ipswich, taking into account the reasonable alternatives?

The overall spatial strategy for the IP-One Area is set out in chapter five of the Site Allocations and Policies DPD. Policies SP10, SP11, SP12 and SP13 define retail allocations, the Education Quarter, Waterfront and Portman Quarter and guide development within these areas. These policies are supported through the Site Allocations and Opportunity Areas guidance which act as indicative concept plans to guide development that is expected to take place. The Strategy is considered to be clearly written and unambiguous.

198. Are the Policies SP10 to SP13 clear and unambiguous and is it evident how a decision maker should react to development proposals on land within the areas they relate to? Are they consistent with national policy?

The SP policies set out the Borough Council's preferred approach to the location of specific functions within the IP-One Area. It is proposed to set out the site related development constraints within the SP policies including heritage assets which development proposals will need to have regard to. Additional policy text will be added to the SP policies in order to cross reference between the allocation policies and the guidance contained within the site sheets.

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[1] https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30_-_historic_england_socg_8.10.20.pdf

199.Would the improvements to pedestrian and cycle routes identified in Policy SP15 provide safe and accessible routes which would promote walking and cycling? Are the improvements deliverable? Have the implications of the provision of these improvements been considered on the viability of the associated schemes?

Yes, the improvements to pedestrian and cycle routes identified in Policy SP15 provide safe and accessible routes which would promote walking and cycling. Yes, they are deliverable.

Some or all funding would need to come from funds accessed through the Local Cycling and Walking Infrastructure Plan and the Transport Mitigation Strategy implementation.

200. Does Policy SP15 provide a clear indication of how a decision maker should react to a development proposal where improvements to pedestrian and cycle routes are supported by this policy? Are the specific improvements set out in the policy all shown on the Policies Map as safeguarded routes?

Policy SP15 identifies the particular priorities for improvement and this is supplemented through the Ipswich Cycling Strategy SPD (CDL G20[2]) referenced in paragraph 5.37 of the Site Allocations DPD. The Public Realm Strategy SPD (CDL G8) and its role in improvements is identified in paragraph 5.36 of the above document. The specific route for the Island Site is shown as an indicative location on the Policies Map, as it represents a major infrastructure requirement. The linking of these routes will come down to detailed cycle/ walking Improvements that Suffolk County Council as the Highway Authority will need to consider in any future highway improvement plans. The purpose of this Policy is to ensure that individual developments on or immediately adjacent to the areas identified take account of the goal of creating these routes and do not compromise the ability to deliver these in the future.

201. Has the Council considered the impact of the regeneration of the IP-One Area on existing uses, including the Port of Ipswich, as well as the heritage assets in this area? What evidence is available to support this?

It is an objective of the development of the Island Site, which is an allocation in the adopted 2017 Ipswich Local Plan, to aspire to the development of a wet dock crossing. Following the decision not to pursue the Upper Orwell Crossing scheme, SCC has reserved up to £10.8m to provide two of the original three bridges in the scheme or something similar. Any development has to ensure it will not prejudice a Wet Dock Crossing at a later date, nor the Port Authority operations.

All the Opportunity Areas lie within Conservation Areas and they have been subject to updated Conservation Area Appraisals. The Opportunity Areas within the IP-One areas have had opportunities and constraint information provided by the Conservation Team. HE in their Statement of Common Ground are happy with the changes made.

Policy DM18 has been updated to include reference to protection of established uses, which was agreed with the Port Authority to ensure the ports significant economic role.

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[2] Ipswich Cycling Strategy SPD https://www.ipswich.gov.uk/sites/default/files/cycling_strategy_spd.pdf

Policy CS13 supports the continuation of the identified character of the quarter areas and therefore important existing businesses reflecting that character, will benefit from additional economic cohesion. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.

The large scale regeneration of Ipswich Waterfront for example includes a substantial element of conversion which protects the setting of adjacent listed buildings an example of which is the relocation of one of the town's largest legal practices into a converted 19th century industrial building adjacent to the historic Customs House.

202. Are the transport proposals in the IP-One Area set out in Policy SP16 effective and justified?

Yes. A form of Wet Dock Crossing remains a possible solution to east-west movements across Ipswich town centre, supported by £10.8m set aside by Suffolk County Council (SoCG CDL I17). SP16 clearly refers to transport infrastructure and proposals, specifying particular areas where cycling and walking should be improved.

203. Does Policy SP16 provide a clear indication of how a decision maker should react to a development proposal where the provision of a new Wet Dock Crossing is proposed and/or improvements to pedestrian and cycle routes are supported by this policy?

Yes, the policy identifies a broad alignment for the route and is clear that development at IP037 should not prejudice the route, should the project be confirmed through the Local Transport Plan, which is currently undergoing review.

204. Should the potential route for a Wet Dock Crossing be shown on the IP-One Area Inset and should reference be made in Policy SP16 to the potential route for a Wet Dock Crossing being shown on the Policies Map?

The potential route is shown on the IP-One Area Inset Policies Map and is necessary to inform master planning of the Island site. Policy SP16 should be modified to refer to the potential route being shown on the IP-One Area Inset policies map. It is not appropriate to safeguard an exact route, as this is contrary to SCC advice. Reasoned justification is therefore more appropriate in the light of this position.

205. Is the town centre car parking policy set out in Policy SP17 justified, effective and consistent with national policy?

The Parking Strategy (CDL D41)[3] will result in only three additional spaces by the end of the plan period (2036). The principal aim is to re-organise parking in the Borough so that it avoids the necessity for commuters and shoppers to drive any further across the town than is required and meet demand where it is needed. The Option chosen, rationalises the existing parking facilities through providing better solutions in the right places and ending temporary car parking through the removal of the equivalent temporary car park spaces to match the number of new spaces created through the development of a new car park . This will help to improve the air quality in the town centre through rationalising parking in the town to

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[3] https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_parking_strategy_final.pdf

reduce longer movements of cars to find suitable parking. This approach has been agreed with SCC through the SoCG (Transport and Parking).

206. Is the delineation of these areas on the Policies Map/Key Diagram effective and justified? Is it clear whether the Development Options, Opportunities and Principles in the Opportunity Areas are policies, site allocations or guidance? Are they effective and consistent with national policy? Would the proposed changes put forward by the Council in its SoCG with Historic England [I30.1] be sufficient to make the Plan sound in this respect?

Opportunity Areas, their status and the 'golden thread' through from strategic policy, allocation policy and site sheets are subject to a SoCG with HE. The SoCG with HE, ensures that the changes made are consistent with national policy and are therefore sound.

207. Is it clear which policies within the ILPR apply to these areas?

It is clear which policies apply in the Opportunity Areas. The Opportunity Area guidance should be read in conjunction with the SP and DM Policies which set out the preferred use of the site and the allocation site sheets. The site sheets identify specific constraints, considerations and opportunities for each individual allocation, whilst the Opportunity Areas set out the vision for the wider area.

208. Should the development opportunities and development principles for each Opportunity Area be set out in a Policy in the Plan?

The Opportunity Areas are currently identified through indicative concept plans to guide development strategically that is encouraged to take place. Due to the status of these areas, as guidance it would be inappropriate to set out the key development opportunities and development principles for each Opportunity Area in a Policy.

209. Would the development opportunities for each area enable development to come forward?

The sites support the regeneration objectives of the Council. The development opportunities for each Opportunity Area take an urban design perspective to the Opportunity Areas including steps to ensure linkages; community cohesion; public safety and open space to provide a joined up approach creating a community rather than isolated developments.

210. Is the extent of the Opportunity Areas justified and effective?

The Opportunity Areas are justified and effective and will allow a more comprehensive approach to their future development rather than focusing on individual allocations as it includes the spaces between allocations and potential for pedestrian links with the surrounding development.

211. Has full consideration been given to the impact of the redevelopment of these Opportunity Areas on heritage assets and existing uses? Are the development principles consistent with national policy in this respect?

Opportunity Areas, their status and the 'golden thread' through from strategic policy, allocation policy and site sheets are subject to a SoCG with HE (CDL I30.1)[4]. The SoCG with HE, ensures that the changes made are consistent with national policy and are therefore sound.

212. What evidence is there to show that these sites will come forward for housing in the Plan period?

Where there is evidence of deliverability, sites identified in the plans associated with the Opportunity Areas are allocated as sites through other policies in the plan. The SP2 allocations includes some sites in the Opportunity Areas – see answers to 109 and 111.

Work through Homes England is increasingly focussing in Ipswich on difficult sites where the market has failed and this work should act as a catalyst to help other sites.

213. Are these sites deliverable and/or developable in the Plan period?

Policy SP4 refers to those Opportunity Sites that are less likely to come forward during the plan period and have been identified as such and excluded from the housing land supply.

214. Have these sites been included in the calculation of housing supply?

The Opportunity Sites in Policy SP4 have not been included within the calculation of housing supply. These sites are important to the Council's urban regeneration ambitions, hence their inclusion within the ILPR, but concerns about long delivery timescales led to the decision to exclude the sites from the housing supply calculations. Their inclusion in the Plan as a whole, does however signal the Council's support for development in these locations. Those sites which are more likely to come forward are included in Policy SP2.

215. Has full consideration been given to the impact of development within the Opportunity Areas on the living conditions of existing residents?

Yes, the majority of the sites are unoccupied or in a poor state of repair. Bringing forward these sites will improve the townscape which will benefit existing residents through associated social infrastructure. Any application would need to comply with Policy DM26 Amenity which aims to provide an attractive living environment for current and future occupiers.

IP028b – Jewsons, Greyfriars Road

216. 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?

The site sheets identify where there are historic environment constraints which will need to be taken into consideration in the redevelopment of sites. In addition, any specific individual site requirements form part of the SP policies. The IP-One Opportunity Area guidelines in Chapter 6 also identify heritage assets which development proposals will need to consider.

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[4] Historic England SoCG - https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30_-_historic_england_socg_8.10.20.pdf

The Council has also adopted the Ipswich Urban Characterisation Study Supplementary Planning Document to cover parts of the town outside the Conservation Areas to explore the character and interest of these areas and provide design guidance to support the management of future development. A comprehensive Urban Archaeological Database has also been prepared for Ipswich and is supported through an interactive Development and Archaeology Supplementary Planning Document. The Borough therefore benefits from a number of adopted heritage and design documents which have supported the preparation of the ILPR.

The site is adjacent to a Scheduled Monument and the importance and constraints related to archaeology are clearly stated in the site sheet.

The Council's approach to the site and Scheduled Monuments has been agreed with Historic England through the SoCG (CDL I30[5]).

IP226 – Helena Road/Patteson Road

217. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, the living conditions of neighbouring residents and car parking?

Yes. The suitability and impact of every development site has been through a rigorous assessment process through the SHELAA, SA and HRA and the Wildlife Audit. The development principles identified through Opportunity Area H Holywells provide urban design and public realm guidance to ensure benefits will be delivered. The ILPR development management policies would ensure that detailed development proposals take these matters into account.

The Waterfront (Policy SP11)

218. Is the extent of The Waterfront appropriately defined? Should it be extended westwards to include land north of Burrell Road?

The Waterfront and Island Site is defined on the IP-One Area Inset Maps (red line in the key). The Council does not agree that it should be extended westwards. These areas represent a transitional area between the waterfront and town centre and have a distinctive character which was defined in conjunction with the Conservation and Urban Design Team.

219. Are the Opportunity Areas clearly defined and labelled on the Policies Map?

As agreed through the Historic England SoCG (CDL I30), the Council propose to clarify the extent of the IP-One Opportunity Areas by inserting a map at the start of Chapter 6 with the eight Opportunity Areas individually labelled and allocated sites identified.

220. Does the policy provide a clear indication of how a decision maker should react to a development proposal within The Waterfront?

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[5] Historic England SoCG - https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i30_-_historic_england_socg_8.10.20.pdf

Policy SP11 defines the mix of uses appropriate to the Waterfront, decision makers will be expected to ensure that applications for new development within this area comply with other relevant planning policy. It is proposed to add an additional line to the policy text (modification 7.1).

221. Should references to the 'Final Draft…' and '(formerly SP14)' be removed from the Policy?

Yes, references to the 'Final Draft' should be removed from the Policy (see modifications 7.2 and 7.3).

Education Quarter (Policy SP12)

222. Does the policy provide a clear indication of how a decision maker should react to a development proposal within the Education Quarter? Is it appropriate to consider Waterfront uses 'on their merits'? Should the policy include criteria against which to assess the merits?

The Education Quarter safeguards education related uses adjacent to Suffolk New College campus and the University of Suffolk Campus and any future expansion. If alternative uses come forward they need to ensure that these do not compromise the meeting of future educational needs. To clarify this, it is proposed to remove *'on its merits'* (modification 7.4).

Portman Quarter (Policy SP13)

223. Does the policy provide a clear indication of how a decision maker should react to a development proposal within the Portman Quarter? Should it contain any criteria against which to assess any proposal or is it sufficient to defer to Policy DM31?

Policy DM31 identifies uses appropriate within the Portman Quarter the appropriate town centre uses within the defined Town Centre Boundary but outside the central shopping area. Accordingly, DM31 encourages town centre uses but directs retail uses to the central shopping area. SP13 is a strategic policy concentrating on uses that are appropriate in the Portman Quarter rather than being development management focussed. Sites within the Portman Quarter should also accord with DM31, as stated in the policy text. It is therefore not necessary to add additional criteria. It is however proposed to add an additional line to the policy text for clarity (modification 7.5).

224. Should references to the 'Final Draft' be removed from the Policy?

Yes, references to the 'Final Draft' should be removed from the Policy (see modifications 7.2 and 7.5).

Conclusion

The AAP for the IP-One Area is sound, and policies and proposals are positively prepared, justified, effective and consistent with national policy. The ILPR been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for employment and business needs for the period 2018-2036.

2,297 words (minus frontage page, questions and suggested modifications)

Suggested Modifications

Modification No.	Page of Final Draft Local Plan Review	Policy/ Paragraph of Final Draft Local Plan Review	Main Modification	Reason
7.1	Page 52	Policy SP11 – Site Allocations DPD	Add additional paragraph for clarity at the end of Policy SP11 to read: 'Applicants need to comply with the relevant development management and other policies appropriate to the application.'	In response to question 220 of the MIQs.
7.2	Page 52	Policy SP11 – Site Allocations DPD	Amend the last three paragraphs of Policy SP11 to read: '…..Within the Waterfront, new development should contain a mix of uses. Residential, community, office, arts, culture, open space, boat-related and tourism uses will be permitted. ~~Final Draft~~ Core Strategy policy DM23 a. shall apply in relation to residential density. Where the Waterfront overlaps with the town centre at the northern quays, all the main town centre uses will be permitted with the exception of retail uses, applications for which will be considered against ~~Final Draft~~ Core Strategy policy DM31. The Education Quarter is addressed through policy SP12 and arts, culture and tourism through policy DM28 ~~(formerly SP14)~~.'	In response to question 221 of the MIQs.

7.3	Page 175	Policy DM28 – Core Strategy DPD	Remove reference to (formally policy SP14) as follows: POLICY DM28: Arts, Culture and Tourism ~~(formerly policy SP14)~~	In response to question 221 of the MIQs.
7.4	Page 54	Policy SP12 – Site Allocations DPD	Amend the policy as follows: 'The Education Quarter is defined on the IP-One Area inset policies map, comprising the Suffolk New College campus and the University of Suffolk campus. Within the defined Education Quarter, development for education and ancillary uses such as student accommodation or offices will be permitted. On sites which fall within the Education Quarter and the Waterfront, the Council <u>will consider Waterfront uses positively</u> ~~would consider Waterfront uses on their merits~~, provided they would not compromise the ability of the University to function or expand and to meet future education needs. Development of site reference IP049 No 8 Shed Orwell Quay will be required to include an element of public car parking in accordance with policy SP17.	In response to question 222 of the MIQs.
7.5	Page 56	Policy SP13 – Site Allocations DPD	Amend the policy as follows for clarity: 'SP13 Portman Quarter The Portman Quarter is defined on the IP-One Area inset policies map as a focus for regeneration in the west of IP-One. The Council's vision for the Portman Quarter is a mixed-use neighbourhood of residential use, open spaces and main town centre uses, <u>(</u>excluding retail<u>)</u>, where they accord with ~~Final Draft~~ Core Strategy policy DM31. <u>Applicants need to comply with the relevant development management and other policies appropriate to the application.</u>'	In response to question 198 of the MIQs.