

Site Allocations and Policies

(incorporating Site Allocations for the IP-One Area Action Plan)

Ipswich Local Development Framework

Issues and Options

June 2006

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1 INTRODUCTION

Background: The Local Development Framework

- 1.1 Ipswich Borough Council is producing a Local Development Framework for Ipswich (the LDF). The LDF will set out planning policies that will guide and influence the development of Ipswich. Together with the Regional Spatial Strategy for the East of England, the Local Development Framework will form the Development Plan for Ipswich.
- 1.2 The Local Development Framework will be distinctive to Ipswich. It is intended that it will consist of the following five main documents:
- ❑ **Statement of Community Involvement**
 - ❑ **Core Strategy & Policies**
 - ❑ **Site Allocations & Policies**
 - ❑ **Requirements For Residential Developments**
 - ❑ **IP-One Area Action Plan**
- 1.3 In addition it is likely that the Council will prepare a series of Supplementary Planning Documents that will provide further advice, policies and guidance in support of the latter four of the above five documents.
- 1.4 Further information on the production process and timetable for each of these documents is set out within the Local Development Scheme for Ipswich which is available from the Council.
- 1.5 The Local Development Framework is subject to Strategic Environmental Assessment and Sustainability Appraisal in order to ensure that proposals for Ipswich's future really are sustainable. A Scoping Report of the Assessment and Appraisal has been published and is available via the Council's website: www.ipswich.gov.uk

Where Are We Now? – Issues and Options on Development Plan Documents

- 1.6 Issues and Options reports have now been produced for each of the four Development Plan Documents which form part of the Local Development Framework. This is the one for the Site Allocations and Policies Development Plan Document.
- 1.7 This stage of consultation on issues and options is being carried out under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004.
- 1.8 We are also consulting on a range of other issues that relate to the other planning documents we will be producing. You may therefore also wish to consider papers entitled:
- ❑ Core Strategy & Development Control Policies DPD
 - ❑ Requirements for Residential Developments DPD
 - ❑ IP-One Area Action Plan DPD
- 1.9 The Issues and Options considered in this Site Allocation & Policies document, and on which the Council is seeking community views, relate to the following matters:
1. The identification of sites for development within Ipswich Borough.
 2. The balance between housing and employment use;
 3. The phasing of the allocations – in other words the sequence of the development of the sites;
 4. The possible options for site allocations put forward; again these will be mainly housing and employment but not exclusively;
 5. The accessibility of the sites suitable for their proposed uses.
 6. Major greenfield residential developments.

- 1.10 The Council undertook some initial consultation on this document in 2005. At this current stage we are setting out options that we would welcome views on. It is very important to note that just because the Council is putting forward a variety of sites and options, it does not mean that the Council supports each one. We want your views before we decide what our view is. Therefore, the options set out deliberately vary from one 'extreme' to the other.

NB: Please note that the Site Allocations & Policies DPD will relate to the entire Borough of Ipswich. However, sites within the area identified for inclusion within the IP-One Area Action Plan DPD will be addressed within the final version of that document rather than this one. For the time being, they are considered in this document, as it is easier at this stage to consider all site issues side by side.

- 1.11 It is anticipated that the comments we receive will be used to formulate a set of preferred options associated with the future development of the town.

How to Comment on This Paper

- 1.12 Any comments you may have in response to the questions and issues in this paper must be submitted to the Council by Monday 24th July 2006. A response form is attached to this document. Please complete it and send it to either:

Email: planningandregeneration@ipswich.gov.uk

or to

Strategic Planning and Regeneration
Ipswich Borough Council
Civic Centre, Civic Drive
Ipswich
IP1 2EE.

Consultation Events

- 1.13 As well as this written form of consultation the Council is organising a series of drop-in consultation events in the first half of July to explain these issues and give people the opportunity to make their views known.

The event schedule is:

- Tuesday 4th July between 11 am and 2 pm;
- Wednesday 5th July between 4 pm and 7 pm;
- Saturday 8th July between 9 am and 12 noon;
- Monday 10th July between 5 pm and 8 pm; and
- Thursday 13th July between 11 am and 2pm.

- 1.14 All the above events will be held in the Corn Exchange, Ipswich. Council planning staff will be available during these times if you would like to come along and ask them about, or discuss, the contents of this document.

- 1.15 In addition, a separate event has been organised that will focus on issues associated with possible development in north Ipswich. This will be open to anyone who wishes to attend and will be held on 17th July 2006 starting at 7.30 pm at the Assembly Hall of Northgate High School.

- 1.16 Please contact the Council's Strategic Planning and Regeneration Team on 01473 432933 or email planningandregeneration@ipswich.gov.uk if you would like to find out more about these events.

What Happens Next

- 1.17 After this period of consultation the Council will produce a document called the Preferred Options for the Site Allocations and Policies Development Plan Document. That document will indicate the Council's preferred option for taking forward various parts of planning policies and it will also set out the other main options that the Council considered before deciding on its preference. There will be further formal public consultation at that time. It is anticipated that the preferred options document will be published in late 2006.
- 1.18 We will take account of people's comments as we select our preferences and we will ensure we fully appraise all the options set out using our Sustainability Appraisal methodology that we have developed and consulted on over the last year or so. That methodology involves assessing each option against social, environmental and economic factors. We will publish a report setting out our work in this area alongside the preferred options documents.
- 1.19 In producing our documents we will
- (a) Ensure mechanisms are in place to deliver the contents of the Framework;
 - (b) Ensure that they are produced in accordance with relevant national regulations and guidance and the Council's Statement of Community Involvement; and
 - (c) Ensure that they are written in a manner which is easy to understand.

2 The Development of Ipswich

- 2.1 The Council does not start with a blank piece of paper when deciding how it would like to see Ipswich being developed. The Council's plans have to be in general conformity with a document called the Regional Spatial Strategy (the RSS).
- 2.2 The RSS is currently in draft form but it should be adopted by the Government before the Core Strategy and Policies Development Plan Document is adopted. There are lots of policies within the RSS that the Council will need to address in its documents but for the purposes of our Core Strategy the box below sets out the key targets.

Ipswich is identified as a key centre where development and change will be focussed

15,400 additional homes to be provided for (2001 to 2021)

An additional 4,710 additional homes to be provided for just outside Ipswich Borough (2001 to 2021)

18,000 new jobs to be provided for (2001 to 2021)

Affordable housing to constitute at least 30% of housing supply with an aspiration of 40% of supply if Ipswich housing stress warrants higher provision

Car traffic levels should be stabilised at 1999 levels

Proposals need to be made for improvements to the access to Ipswich Waterfront and Port

All major developments to provide at least 10% of their energy requirements via renewable power generation

Source: Draft East of England Plan 2004

- 2.3 It is possible that these elements will be different within the final adopted RSS and if that is the case the work on our planning policy documents will need to change to reflect the differences.
- 2.4 In addition there are three additional major factors that are effectively committed and have a bearing on Ipswich's planning policy documents. These are summarised in the box below.

There will be a new University Campus Suffolk and a new Suffolk College open in 2007 / 2008

The 2012 Olympics

The Department of the Environment, Fisheries and Food and the Environment Agency are committing over £40 million pounds to Ipswich over the next six years to ensure that the vast majority of the town is protected from tidal flooding

3 Issues and Options: Site Allocations and Policies

Issue 1: The Identification of the Most Appropriate Use for Development Sites

- 3.1 Ipswich has been set challenging targets in the Draft East of England Plan 2004 for housing and employment. The borough must provide 15,400 new homes (2001-2021) and 18,000 jobs. Therefore, the focus of this Site Allocations Issues and Options Paper is on these two sectors. When considering employment uses, this includes B1, B2 and B8 uses but also retail and leisure uses.
- 3.2 The final version of the Site Allocations & Policies DPD will contain policies which will involve the allocation of sufficient land to meet the housing and employment targets set by the Regional Spatial Strategy. This paper looks at which sites could be allocated for a variety of uses including housing and employment and how potential sites should be chosen. Possible approaches to this could include the application of a sequential approach to sites based on proximity to the centre of Ipswich or to existing transport routes or local amenities. Alternatively, a standard set of criteria could be produced including such aspects as access, site size and neighbouring uses. These could then be used to determine whether site locations are suitable for the type of development proposed. The sustainability appraisal process will also help fulfil this role.

Housing

- 3.3 The number of new homes that will be allocated to Ipswich has yet to be finalised by the Government via the East of England Plan, the Regional Spatial Strategy (RSS). The Core Strategy will set out the framework by which the Council will meet this requirement whereas this Site Allocations & Policies DPD will set out the detailed policies including the identification of sites. The draft RSS housing target (2001-2021) for Ipswich is 15,400 new dwellings.

Employment

- 3.4 An Employment Land Study was completed towards the end of 2005 by DTZ Pidea Consulting. Commissioned by the Haven Gateway Partnership, the study covered an area incorporating the boroughs of Ipswich and Colchester and the districts of Tendring, Suffolk Coastal and Babergh. (The Haven Gateway area also includes a small area of Mid-Suffolk District). The study identified Ipswich as having an adequate supply of employment land for the period to 2021 (74.4ha). Of this supply of employment land, a surplus of approximately 12ha was identified. A key issue for Ipswich's employment land supply concerns the fact that Ransomes Europark is expected to be developed out within a period of three to five years. Most other development sites tend to be much smaller (i.e. less than 2ha). Therefore, a key consideration for Ipswich will be whether there is a sufficient supply of the right sites of sufficiently high quality in the right locations to cater for long term demand.

OPTION 1: Allocating land for housing is more important than allocating land for employment.

OPTION 2: Allocating land for employment is more important than allocating land for housing.

OPTION 3: Each site should be considered on its own merits.

OPTION 4: The use of a site should be determined through the application of criteria (i.e. for housing, proximity to amenities, employment and public transport accessibility).

OPTION 5: The use of a site should be determined by a sequential approach which considers brownfield vs. greenfield, public transport accessibility etc.

Consultation Questions

- Q1: Which option do you prefer and why?**
- Q2: Do you think there is a benefit of clustering any of the following uses together:**
- (a) Housing?**
 - (b) Office?**
 - (c) Industrial?**
 - (d) Retail?**
 - (e) Leisure?**
- Q3: If you chose Option 4, what criteria do you think the Council should use to decide the appropriate use?**
- Q4: If you chose Option 5, what do you think the sequential approach should be?**
- Q5: Do you know of any sites which have not been included in this document that may be suitable for housing and / or employment uses? If so, where?**

Issue 2: The Balance Between Housing and Employment Use

- 3.5 An important aspect of sustainable development is to plan land uses in a complementary way, so that residents have the option to get to jobs, shops, schools and leisure facilities without using the car and preferably on foot. This points towards trying to locate houses and jobs together to create mixed-use neighbourhoods. In doing this, the Council is required to meet the housing and jobs targets set out in the Regional Spatial Strategy. These targets will inevitably have a bearing on the amount of land required. Possible approaches to determining the balance between housing and employment uses could follow either a borough-wide approach to sites; a clustered approach including such areas defined as town centre, edge of centre and outer urban and urban edge zones; or, a site by site approach to a mix of uses. Developments may come forward that offer flexibility between two broad uses. For example, employment uses such as office space and retail could, in the future, be easily converted into residential use. These types of developments would need to be located in areas where this flexibility would be appropriate.

OPTION 1: The Council should try to balance housing and employment provision in each neighbourhood.

OPTION 2: The Council should recognise that the balance will differ across areas and go for a borough-wide balance.

OPTION 3: The Council should cluster similar uses together to achieve single-use areas.

Consultation Question

- Q6: What should be the Council's approach to balancing Housing and Employment allocations across the Borough?**

Issue 3: The Phasing of Allocated Sites

3.6 The targets set out in the Regional Spatial Strategy for the provision of additional housing and jobs by 2021 need to be delivered in a sustainable way and phased logically to bring forward a constant and flexible supply of sites suitable for particular uses. The Council must ensure that difficult sites or particularly important sites for regeneration are brought forward.

3.7 The Council is required to adopt a 'plan, monitor and manage' approach for the delivery of development sites. It is important that the development plan document incorporates a mechanism through which to achieve this.

OPTION 1: Phasing should be based on prioritising those sites with the best sustainability appraisal results.

OPTION 2: Phasing should be based on prioritising sites ready for development first (i.e. sites with no constraints to development).

OPTION 3: Phasing should be based on prioritising problem sites first (ie. sites generating public complaints or harming the borough's image).

OPTION 4: Phasing should prioritise sites reflecting the regeneration priorities.

Consultation Questions

Q7: Which option do you prefer and why?

Q8: If you do not agree with any of the options, then what would be your approach to the phasing of sites?

Q9: Do you disagree with a phased approach altogether?

Issue 4: Site Options and Proposals

3.8 There are 70 sites identified in Appendix A to this document. In total, these sites offer a total in excess of 130 hectares of brownfield land for development. The vast majority of the sites are previously developed (or brownfield) sites.

3.9 Sites have been suggested by a variety of organisations and individuals including landowners, developers, agents, parish councils, consultants and planning officers. The table below sets out all the sites suggested so far.

Site No	Site Name	Area (ha)	IP-One Area Action Plan
S001	Land between 81-97 Fore Street	0.12	✓
S002	Handford Road (east)	0.46	✓
S003	Sir Alf Ramsey Way / West End Road	2.53	✓
S004	Former Took's Bakery, Old Norwich Road	2.80	
S005	Ranelagh School, Pauls Road	1.13	✓
S006	All Weather Area, Halifax Road	0.78	
S007	Victoria Nurseries, Westerfield Road	0.39	
S008	Co-op Depot, Felixstowe Road	5.15	
S009	Smart Street / Foundation Street	0.85	✓
S010	Peter's Ice Cream & Portia Engineering, Grimwade Street	0.33	✓
S011	Hill House Road	0.10	
S012	Land between Fore Hamlet / Duke Street	0.21	✓
S013	West End Road Surface Car Park	1.24	✓
S014	Funeral Directors, Suffolk Road	0.72	
S015	Anglia Telecom / Car Sales / Builders Yard	0.48	
S016	Deben Road	0.36	
S017	153-159 Valley Road	0.25	
S018	Water Tower & Tennis Courts, Park Road	1.54	
S019	Randwell Close	0.24	
S020	The Albany	1.14	
S021	94 Foxhall Road	0.17	
S022	Fire Station, Colchester Road	1.21	
S023	Mallard Way Garages	0.13	
S024	Plover Road Garages	0.17	
S025	Former Garages, Recreation Way	0.19	
S026	163 & 165 Henniker Road	0.15	
S027	Widgeon Close Garages	0.10	
S028	Land West of Greyfriars Road	1.03	✓
S029	Land Opposite 674-734 Bramford Road	2.25	
S030	Land at Humber Doucy Lane	2.48	
S031	Halifax Road Sports Ground	4.67	
S032	103-115 Burrell Road	0.30	✓
S033	King George V Field, Old Norwich Road	8.42	
S034	Land at Bramford Road (Stock's Site)	2.03	
S035	578 Wherstead Road	0.64	
S036	Key Street/ Star Lane / Burtons	0.54	✓
S037	No. 7 Shed, Orwell Quay	1.52	✓
S038	Island Site	6.02	✓
S039	Land between Vernon Street & Stoke Quay (a) and (b)	2.56	✓
S040	Civic Centre / Civic Drive (a) and (b)	1.25	✓
S041	Land between Cliff Quay & Landseer Road	3.78	✓
S042	Commercial Buildings and Jewish Burial Ground, Star Lane	0.66	✓
S043	South of Mather Way	0.78	✓
S044	Holywells Road (west)	2.06	
S045	Wolsey Street	0.33	✓
S046	Royal Mail Sort Office, Commercial Road	1.31	✓
S047	Commercial Road	0.97	✓
S048	Commercial Road	1.16	✓
S049	Commercial Road	2.47	✓
S050	Mint Quarter	1.73	✓
S051	No. 8 Shed, Orwell Quay	0.76	✓
S052	Land West of New Cut, south of Felaw Street	0.74	✓

Site No	Site Name	Area (ha)	IP-One Area Action Plan
S053	Old Cattle Market Site, Portman Road	2.17	✓
S054	Land between Lower Orwell Street and Star Lane	0.40	✓
S055	Orwell Retail Park, Ranelagh Road	5.51	✓
S056	Land between Old Cattle Market and Star Lane	2.55	✓
S057	Crown Street Car Park Site	1.90	
S058	Russell Road / Princes Street / Chancery Road	0.63	✓
S059	Princes Street / New Cardinal Street	0.42	✓
S060	St Georges House, St Matthews Street	0.15	✓
S061	Land north of Whitton Lane	1.32	
S062	Raeburn Road South / Volvo Site, Sandy Hill Lane	6.07	
S063	Cranes Site	16.70	
S064	Elton Park Industrial Estate	6.61	
S065	Fison House, Princes Street	0.35	✓
S066	School site, Duke Street	1.20	✓
S067	School site, Lavenham Road	1.08	
S068	Former Norsk Hydro site, Sandy Hill lane	6.55	
S069	London Road allotments (part)	1.55 (or 0.73)	
S070	Holywells Road (east)	3.71	
TOTAL	(Maximum hectares)	139.32	

3.10 Appendix A contains maps which show all the sites listed above together with use options and some additional information on possible constraints to development. Each possible option has a brief commentary setting out an example of the level of development they may provide. A comment form is attached to complete for each site. The questions listed on the site comment form are listed as follows:

1. *Do you think this site should be allocated for development?*
2. *What is your preferred use for this site?*
3. *Why is this your preferred use for this site?*
4. *If the Council decides to promote a mix of uses on this site, what mix of uses do you believe it should promote?*
5. *What are your views on the current use of this site?*
6. *Are you aware of any difficulties relating to developing this site?*
7. *Do you have any other comments about this site?*

Consultation Question

Q10. If you know of any other additional sites within the Borough that should be considered by the Council for allocation as development sites, please give as much information as possible including a location plan identifying the site.

Issue 5: Major Greenfield Development Sites

3.11 A range of factors will determine whether or not greenfield development will be required in Ipswich by 2021. These include:

- The total number of units required by 2021;
- The other sites that could be developed for residential use;
- The density of residential developments in Ipswich;
- The balance between the need for houses and flats; and
- The realistic availability of other sites to be developed.
- Levels of 'windfall' development.

- 3.12 Most of these issues are addressed elsewhere in this document and the Core Strategy Issues and Options Paper.
- 3.13 It is only when these factors are considered together that it will be determined by the Council whether greenfield development should be one of its preferred options. However, it is also important that the Council considers some of the more detailed issues associated with major greenfield development if it is concluded it is needed.
- 3.14 This issue therefore looks at:
- (i) Where any major greenfield development would go?
 - (ii) How large any major greenfield development should be?
 - (iii) When it would be appropriate for major greenfield development to take place?
- 3.15 Each of these three sub-issues is dealt with in turn:

Issue 5(i) Where should any major greenfield development go?

- 3.16 Broadly speaking, the work on the Suffolk Structure Plan concluded that any major greenfield development in the Ipswich area should go to the north of the town. Due to the position of the Ipswich boundary this remains the only logical place to put possible greenfield development. All other substantial greenfield areas within the boundary are in public use in one form or another (e.g. as school fields or public parks). However, there are six possible options within the north Ipswich area. The fact that these six options are put forward does not mean that the Council has concluded as to whether any or all of them are suitable for housing development. The six options are set out below and illustrated on the attached map.

Site Option A: North of Defoe Road and West of Henley Road

Site Option B: North of the railway line between Henley Road and Westerfield Road

Site Option C: South of the railway line between Henley Road and Westerfield Road

Site Option D: Between Westerfield Road and Tuddenham Road and south west of the Felixstowe branch railway line

Site Option E: Between Westerfield Road and Tuddenham and between the two railway lines

Site Option F: North east of Humber Doucy Lane

Consultation Questions

Q11: How would you rank the six sites in order of preference for residential development (please rank from 1 (most preferred) to 6 (least preferred)?

Q12: Why did you rank them in that order?

Q13: Are there any other areas of greenfield land that you believe the Council should consider for development? If so, what areas are they?

Issue 5(ii) How large should any major greenfield development be?

3.17 There is an argument that if a greenfield development is proposed, then it should be large enough to ensure that it can provide a wide range of facilities (e.g. primary school, community centre etc.). Alternatively, it could also be argued that it should be as small as possible to meet the housing targets of the town and help to meet the targets for brownfield development. In addition, it could be argued that the Council should think about the really long term (i.e beyond 2021) and plan for a larger development that can meet future needs but be thought about in conjunction with something proposed in the shorter term. The first three options below relate to these issues. The fourth option sets out some possible size figures for greenfield development.

OPTION 1: The Council should plan for as little greenfield development as possible.

OPTION 2: The Council should plan for a development that can provide a wide range of facilities for both the new housing and established neighbouring communities.

OPTION 3: The Council should plan for a development that goes beyond the current housing targets for Ipswich (up to 2021).

OPTION 4: The Council should plan for a greenfield development of:

- (i) 500 homes**
- (ii) 1000 homes**
- (iii) 1500 homes**
- (iv) 2000 homes**
- (v) 3000 homes**
- (vi) as many as will fit on greenfield land available.**

Consultation Questions

Q14: Which of the first three options above do you believe the Council should follow in terms of greenfield development and why?

Q15: If you have a view on how large a greenfield development could be, which of the six choices in Option 4 above ((i) to (vi)) do you prefer and why?

Q16: Are there any other factors you believe the Council should consider when deciding how large any greenfield development should be? If so, what are they?

Issue 5(iii) When would it be appropriate for major greenfield development to take place?

3.18 The Council has to be sure that its strategy for land release will provide sufficient housing to meet its housing requirements throughout the plan period. On the one hand, a major greenfield release could counter a sequential and sustainable approach by competing too strongly with brownfield sites. On the other hand it could assist housing delivery in circumstances where brownfield sites are slow to come forward.

3.19 There are four alternative positions that could be taken here. These range from ensuring no greenfield development takes place until all available previously developed land (brownfield) in the town is developed, to not putting any time constraints on any greenfield development. The four options below reflect these two extremes and two middle ground options. Questions 17 and 18 below relate to these options and Question 19 provides an opportunity for any further comment on the wider issue of greenfield and/or north Ipswich development.

OPTION 1: The Council should plan for all greenfield development to take place after all brownfield land sites have been built on.

OPTION 2: The Council should plan to release greenfield land for development on a phased per annum basis in line with an overall percentage target for greenfield development as a proportion of total development.

OPTION 3: The Council should only release greenfield sites for development after all brownfield sites are developed (i.e. Option 1) or when housing completions fall more than 20% below the cumulative per annum target.

OPTION 4: The Council should not set any limitations on when greenfield development could take place.

Consultation Questions

Q17: Which of the four options do you prefer and why?

Q18: Are there any other factors you believe the Council should consider when deciding when any greenfield development should be? If so, what are they?

Q19: Are there any other major issues you think the Council should take into account when considering greenfield issues and/or developments to the north of Ipswich?

Issue 6: Accessibility of Sites

3.20 Accessibility planning aims to promote social inclusion by helping people from disadvantaged groups or areas access jobs and essential services. It encourages local authorities and other agencies to assess more systematically whether people can get to places of work, healthcare facilities, education, shops and other destinations that are important to local residents. It would also provide the framework for transport authorities and other relevant agencies to work together to develop and deliver solutions to accessibility problems depending on the particular needs and priorities of local areas. An accessibility framework would include:

- An accessibility audit;
- An action plan; and
- A monitoring system.

3.21 The application of accessibility planning will be an important tool in the delivery of sustainable development options by providing facilities in locations where they are both required and readily accessible by a choice of means of transport (including public transport).

Consultation Question

Q20: How can accessibility planning best be used to identify development opportunities and options within the LDF?