

Ipswich Local Plan

Authority Monitoring Report 18, 2021/22

April 2023



IPSWICH
BOROUGH COUNCIL

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AUTHORITY MONITORING REPORT

Executive Summary	2
Chapter 1: Introduction	16
Chapter 2: Local Development Scheme	17
Chapter 3: Policy Implementation	20
Chapter 4: Performance Against Our Plan Objectives	25
Chapter 5: Duty to Co-operate	31
Chapter 6: Sustainability Appraisal	33
Chapter 7: Conclusions	35
Appendices	37
Appendix 1 – High Standards of Design	38
Appendix 2 – Carbon Emissions	39
Appendix 3 – Housing Completions and Employment Provision	43
Appendix 4 – IP–One Development	60
Appendix 5 – Strategic Facilities	62
Appendix 6 – Accessibility	68
Appendix 7 – Flood Protection	71
Appendix 8 – Protection of Open Spaces	74
Appendix 9 – Community Infrastructure	79
Appendix 10 – Deprivation	80
Appendix 11 – A Safe and Cohesive Town	83
Appendix 12 – Ipswich Strategic Planning Area	88
Appendix 13 – Monitoring against the Sustainability Appraisal	90
Web links	93
Glossary	96

Table no.	Table title	Page
1	Progress against the Targets in the Core Strategy	7
2	Five Year Housing Requirement and Supply (2022-2027)	22
3	Core Strategy Policy Usage	23
4	Development Management Policy Usage	24
5	Progress against the Targets in the Core Strategy	28
6	Sustainability Appraisal Objectives	34
7	Completed Dwellings or Non-Residential Floor Space (CfSH or BREEAM)	38
8	CO ₂ Emission Estimates and Population Figures	41
9	Ipswich Carbon Emissions (2005-2019)	42
10	Net Housing Completions and Affordable Housing	45
11	Net Housing Totals Since 2001	46
12	Housing Target Evolution	46
13	5 Year Housing Land Requirement	47
14	Ipswich Housing Land Supply 2022-2027	47
15	Ipswich Housing Land Supply Calculation at 1 st April 2022	48
16	Net Annual Housing and Employment Land Completions	48
17	Target (To Deliver)	49
18	Ready to Develop Housing Sites (Housing Trajectory)	51
19	Previously Developed Land (Vacant or Derelict)	61
20	Density of Residential Development in IP-One	61
21	Schemes in IP-One (Mix of Uses)	61
21a	Ipswich Town Centre Footfall Data 2019-2021	63
22	Vacancies with Central Shopping Area, District and Local Centres	63
23	Ipswich Town Centre Diversity of Use for Commercial Units	63
23a	Ipswich Town Centre Diversity of Use by Primary, Secondary and Specialist Uses	64
24	Ipswich Town Centre Diversity of Use for Commercial Floorspace	65
25	Sub-regional Centre Rankings	65
26	Frontages Within Use Class A1 in the Ipswich Central Shopping Area	66
27	District and Local Centres Overview	66
28	Additional Employment Floorspace Futura Park Site	66
29	Gains in Green Infrastructure within Ipswich Strategic Planning Area	67
30	Student Numbers at University Campus Suffolk and Suffolk New College	67
31	Harper Dennis Hobbs Vitality Rankings of Shopping Centres - deleted	---
32	Transport Indicators	69
33	Applications Subject to Environment Agency Consultation	71
34	Summary for Area of Protection	74
35	County Wildlife Sites 2021-2022	75
36	Sites of Special Scientific Interest	76
37	Ramsar Sites	76
38	Ancient Woodland	76
39	Local Nature Reserves	77
40	Suffolk Register of Buildings at Risk	77
41	Tree Canopy Cover	78
42	Ratio of Full Time Equivalent Pupils to Full Time Qualified Teachers (FTE)	79
43	Percentage of those Unemployed Ages 16 – 64	81
44	Percentage of Students Achieving Level 4 or above English and Maths - deleted	---
45	Secondary School Pupils Achieving 5+ A* - C GCSE English and Maths - deleted	---
46	KS5 gaining 3 or more A Levels at A* - E - deleted	---
47	Ipswich Rankings (1-326) in Indices of Multiple Deprivation	81
48	Ipswich Rank on Indices of Multiple Deprivation – Suffolk Comparisons	82
49	Totals of All Events Including One Off Annual Events	85
50	Organised Visitor Groups to Ipswich Museums, Galleries and Christchurch Mansion	86
51	Total Tickets Issues/ Visitors	86
52	Crime Figures Recorded	86
53	Ipswich Recorded Crime Figures per Thousand - deleted	---
54	SEA Objectives and Indicators	90

EXECUTIVE SUMMARY

Monitoring is an essential element of policy making. The main function of the Authority Monitoring Report (AMR) is to provide evidence of policy implementation and review the effectiveness of policies, show progress in document preparation (development plan documents and supplementary planning documents), and to report on the delivery of housing and employment floor space. The AMR is the main mechanism for assessing the performance of the Ipswich Local Plan.

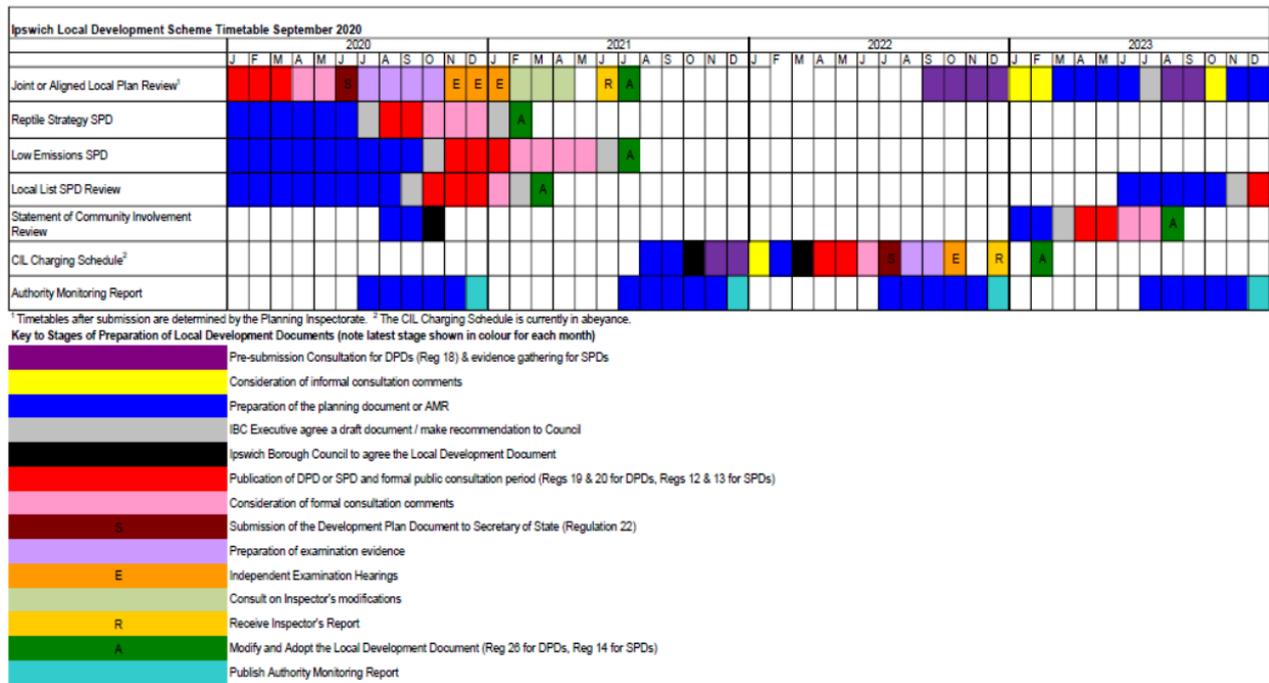
This report covers the monitoring period April 2021 to March 2022. It also refers to wider policy developments up until the date of publication of the report (December 2022).

On 23rd March 2022 Ipswich Borough Council adopted the Ipswich Local Plan 2018-2036, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan comprises the Core Strategy and Policies Development Plan Document (DPD) Review, Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, Policies Map and IP-One Area Inset Policies Map. The 2022 Ipswich Local Plan 2018-2036 supersedes the 2017 Ipswich Local Plan 2011-2031.

For this monitoring period (2021/22) the housing delivery and land supply policies will be measured against the Ipswich Local Plan 2022, as the new Local Plan adopts a baseline of 2018. However, the implementation of Local Plan policies through Development Management decisions will use the policies from the 2017 Local Plan as these were the relevant policies for all but a handful of weeks within the monitoring year.

How is Ipswich Borough Council Performing against its Local Development Scheme?

The Council's Local Development Scheme (LDS) details the planning documents that the Council intends to produce over a three-year period. The LDS for the monitoring year 2020-2021 was adopted in November 2020 and the work programme is reproduced below.



The way in which this chart shows the post-submission examination of DPDs is indicative only and will ultimately be a matter for the Inspector to determine

Chapter 2 discusses the progress the Council has made in the production of these documents between April 2021 and March 2022.

In terms of document preparation, the headline achievements of the year 2021-2022 were:

- On 23 March 2022, Ipswich Borough Council adopted the Ipswich Local Plan Review 2018-2036, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- The Reptile Strategy Supplementary Planning Document (SPD) was adopted on the 28 July 2021. The Reptile Strategy SPD provides a planned approach to translocation by identifying potential receptor sites in advance and developing a clear delivery strategy including ongoing monitoring and site management. This is essential to support needed housing delivery in the Borough and to protect existing reptile populations.
- The Local List (Buildings of Townscape Interest) SPD was adopted on the 10 August 2021. The Local Lists raises awareness of the many unlisted but interesting and locally notable historic assets which make up the historic environment of our town and support the Council's adopted Local Plan.
- The Low Emissions SPD (incorporating the Parking Guidance for the IP-One Area) was formally adopted by Ipswich Borough Council on 17th November 2021 at a meeting of Full Council. The Low Emissions SPD aims to improve air quality across Ipswich through new development. This will be achieved, where possible, through either preventing new emission sources or encouraging emission reductions, physical activity and healthy lifestyle choices.
- On 27th July 2022 Ipswich Borough Council adopted a new Development and Flood Risk Supplementary Planning Document ('SPD'). The Development and Flood Risk SPD replaces the previous version of the SPD which was first adopted in 2013. It reflects the Ipswich Local Plan 2022 and the National Planning Policy Framework. It takes account of the completion of the Ipswich tidal barrier in 2019 and new data which informed the Ipswich Strategic Flood Risk Assessment, October 2020.
- In December 2021 Ipswich Borough Council updated its Part One Brownfield Land Register, a register of brownfield land which is suitable for residential development.

Reviewing the Local Plan

The Local Plan Review process is an opportunity to review the existing Local Plan vision and objectives, policies and site allocations. A review of the adopted Ipswich Local Plan 2017 began immediately after its adoption, in order to prepare aligned Local Plans as far as possible with Babergh, Mid Suffolk and East Suffolk (formerly Suffolk Coastal) District Councils¹.

The review was broadly aligned with those of our neighbouring local planning authorities within the Ipswich Strategic Planning Area (ISPA). The geography of the area now equates with the Ipswich Housing Market Area and the Ipswich Functional Economic Area, which both extend over the whole of Ipswich Borough, Babergh and Mid Suffolk District Councils and the former Suffolk Coastal District element of East Suffolk.

The Ipswich Local Plan review commenced with an Issues and Options 'Regulation 18' consultation which took place between August and October 2017. The Issues and Options consultation document contained a joint strategic Part One section, prepared with the then Suffolk Coastal District Council (as it was in 2017). Part Two of the Issues and Options document focused on Ipswich-specific local matters. The Council undertook a further round of Regulation 18 consultation on an informal draft of the revised Local Plan between 16th January 2019 and 13th March 2019.

Ipswich Borough Council consulted on the Ipswich Local Plan Review Final Draft version from Wednesday 15th January until Monday 2nd March 2020. The Council sought representations in relation to the 'legal compliance' and the 'soundness' of the Ipswich Local Plan Review Final Draft.

On 10th June 2020 the Ipswich Local Plan Review 2018-2036 was submitted to the Secretary of State for Housing, Communities and Local Government for independent examination. Karen Baker DipTP MA DipMP MRTPI and Mike Hayden BSc (Hons) DipTP MRTPI were appointed to hold an independent examination of the Ipswich Borough Council Local Plan Review. The Examination Hearing took place between the 24 November and 16 December 2020. Following the close of the Examination Hearing Sessions, the Inspectors confirmed to the Council in their [letter dated 10th March 2021](#) that the Examination could proceed to a public consultation on the proposed Main Modifications.

The Council invited representations on the proposed Main Modifications on issues of legal compliance and/or soundness. The tests of soundness are defined in paragraph 35 of the National Planning Policy Framework (NPPF 2021). The consultation on the Main Modifications ran for eight weeks commencing on 29 July 2021 and ending on 23 September 2021.

On 23 March 2022, Ipswich Borough Council adopted the Ipswich Local Plan Review 2018-2036, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan comprises the Core Strategy and Policies Development Plan Document (DPD) Review, the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review, Policies Map and IP-One Area Action Plan Inset Policies Map.

¹ On 1st April 2019, Suffolk Coastal District Council and Waveney District Council combined to become East Suffolk Council. Within this AMR, the title Suffolk Coastal District Council is used where the work was historic, and East Suffolk Council where the work is ongoing. The Local Plan for that area still relates to the area covered by the former Suffolk Coastal District Council.

Strategic planning across the whole of Suffolk

The Suffolk Growth Programme Board (SGPB) brings together representatives from the Suffolk Local Authorities, the New Anglia Local Enterprise Partnership (LEP), the University of Suffolk and the Suffolk Chamber of Commerce. The SGPB is taking forward a Suffolk wide 'Framework for Growth', which has been agreed by the Suffolk Growth Portfolio Holders and Leaders of all Local Authorities. The Framework for Growth brings together the work being taken forward across Suffolk to address future development needs into a single, integrated programme.

The Framework is a non-statutory document intended to support and inform the preparation of the Local Plans being produced by individual planning authorities. Information relating to the Suffolk Growth Programme Board and the Suffolk Framework for Growth is hosted on the East Suffolk Council website and can be accessed using the following link -

<http://www.eastsuffolk.gov.uk/business/business-advice-and-training/suffolk-growth-programme-board/>.

How well are policies from the adopted Core Strategy and Policies Development Plan Document being implemented?

Review of the implementation of Local Plan policies through Development Management decisions will use the policies from the 2017 Local Plan as these were in use during 2021-22.

The Core Strategy policies (with the prefix 'CS'), of which there are 19, were used 274 times. The most frequently used policies were CS2: 'The Location and Nature of Development' (used 58 times) and CS4: 'Protecting our Assets' (also used 58 times).

The Core Strategy policies not used were Policy CS6: 'The Ipswich Policy Area', CS11: 'Gypsy and Traveller Accommodation', CS18 'Strategic Flood Defence' and CS20: 'Key Transport Proposals'. These policies are strategic in nature and are still required throughout the life of the plan.

The Development Management policies (with the prefix 'DM'), of which there are 28, were used a total of 2,129 times. The most frequently used policies were DM5: 'Urban Design Quality' (used 486 times), DM12: 'Extensions to Dwellinghouses and the Provision of Ancillary Buildings' (used 298 times), DM26: 'Protection of Amenity' (used 207 times), DM8: 'Heritage Assets and Conservation' (used 197 times) and DM10: 'Protection of Trees and Hedgerows' (used 204 times).

The number of times policies were used increased during the 2021-2022 monitoring period, recovering from a dip during the previous monitoring period.

During the 2020/21 monitoring year the government introduced significant changes to the system of use classes. Classes A, B1 and D1, applicable to retail, office and non-residential institutions and assembly and leisure uses respectively, are removed and new use classes introduced in their place. The new Class E encompasses commercial, business and service uses, while the new F.1 and F.2 apply to learning and non-residential institutions and local community use respectively. In addition, some uses which were previously given their own use class have been moved into the 'sui generis' category, meaning that they now belong to no specific class. Changes to and from these uses will be subject to full local consideration through the planning application process. The residential (C classes), general industrial (B2) and storage and distribution (B8) use classes remain unchanged, except for a new cross reference in the B2 class to the new Class E 'commercial' use class.

The new Use Classes Order removes the need to obtain planning permission for a change of use between a range of commercial activities and introduces part-uses. The most frequently used policies remained those related to extension to dwelling houses and provision of ancillary

buildings, reflective of a trend for home improvements which arose as a result of people working and spending extended periods of time at home.

How well are the 2017 Core Strategy Targets being met?

There are twelve objectives in the 2017 Core Strategy, supported by targets, and progress against these targets is summarised in Table 1, below. Chapter 2 provides more detail on the objectives, targets and indicators. The 12 strategic objectives address key issues and challenges for Ipswich over the Plan period.

This chapter firstly considers the extent to which the policies are being implemented and secondly considers the delivery of the plan and wider trends in relation to the indicators and targets identified in relation to the 12 objectives set out in chapter 11 of the 2017 Core Strategy.

The 12 strategic objectives have been updated in the 2022 Core Strategy. During this monitoring year performance will be assessed against the objectives in the 2017 Local Plan as these were in use during most of the 2021-2022 monitoring period. In 2022/23, implementation will be assessed against the objectives in the 2022 Core Strategy.

Table 1 Progress against the Targets in the Core Strategy

Core Strategy Target	Progress in 2021-22	Commentary
<p>At least 75% of new dwellings gaining planning permission in any year to achieve 'Code for Sustainable Homes' levels as set out in policy DM1 of the Core Strategy and Policies DPD.</p>	<p>Policy DM1 of the 2017 Core Strategy was used 79 times in connection with Development Management decisions. The Council will expect new build residential development to achieve a 19% improvement in energy efficiency over the 2013 Target Emissions Rate. This is equivalent to meeting the Code 4 energy efficiency requirement.</p>	<p>The Code for Sustainable Homes was withdrawn in 2015 and the Local Plan 2017 was revised to reflect this, although it retained certain water and energy efficiency measures. Since the removal of the Code, some developers have applied to remove the specific conditions from their planning permissions.</p>
<p>To reduce Ipswich's estimated carbon footprint by 60% from the 2004 base level (Cred) by 2025.</p>	<p>During the period 2005 to 2020 industry and commercial, domestic and transport carbon emissions reduced. CO₂ emissions per capita also reduced in Ipswich to a low of 2.7 CO₂(t).</p>	<p>The level of reduction of industry and commercial, domestic and transport carbon and per capita CO₂ emissions continues a downward trend reported since 2005. Over the coming year, Ipswich Borough Council's principal air quality priority is to continue to work towards implementing the measures in the Ipswich Borough Council Air Quality Action Plan 2019 – 2024 (updated 2021). The Council has produced a Low Emissions Supplementary Planning Document (SPD) to support meeting this target, which was adopted on the 17th November 2021. The Ipswich Borough Council Air Quality Action Plan 2019 - 2024 (updated 2021) found that annual mean NO₂ concentrations dropped considerably compared to previous years, although it is noted that the outbreak of COVID-19 and the Government imposed lockdowns undoubtedly had an impact on air quality in 2020. An increase in the annual mean NO₂ concentration can be seen in 2021 compared to 2020, but concentrations remained below 2019 levels.</p>

<p>To deliver at least (a) 9,777 homes by 2031 and (b) 12,500 jobs by 2031.</p>	<p>171 homes were built in the reporting period.</p> <p>Ipswich experienced growth of 4,000 jobs 2011-2020 (Suffolk Observatory/NOMIS and ONS) or an average of 444 jobs per year. More recently, the total number of jobs reduced 2018-2019 but stabilised at 80,000 in 2020.</p>	<p>Housing completions of 171 dwellings for 2021-22 were below the 2017 Local Plan requirement of 489 dwellings p.a. However, work was already underway on a Local Plan review to align with the standard method for assessing housing need, and address housing delivery. This Local Plan, covering the period from 2018 to 2036, was adopted in March 2022. The new Local Plan housing requirement for 2021-22 is 300 dwellings per annum. Completions recorded for 2021-22 represent 57% of the updated housing requirement.</p> <p>Housing completions for the 2021-22 monitoring period are also down on the previous year by 150 dwellings (171 dwellings compared with 321). The Housing Delivery Action Plan (2022) 'Root Cause Analysis' of housing under-delivery in Ipswich identifies six factors which are currently affecting delivery rates in Ipswich. They include the higher cost of development and lower land values on urban brownfield regeneration sites. Another factor is reliance on higher density brownfield development including flatted development, which has proved less resilient in the market following the Covid Pandemic.</p> <p>The Council is addressing delivery issues through facilitating development at Ipswich Garden Suburb; making funding bids (such as the successful Housing Infrastructure Fund bid for Ipswich Garden Suburb); and Capacity Pilot Partnership with Homes England to help bring forward market failed brownfield sites.</p> <p>Ipswich had a target to deliver approximately 625 jobs per annum through the 2017 Local Plan, reduced to 528 jobs per annum through the 2022 Local Plan (reflecting a lower housing requirement). Based on the data from the Suffolk Observatory, Ipswich has delivered average jobs growth per annum of 444 jobs 2011 to 2020. The average masks stronger growth 2012-2018, followed by a fall in jobs in 2019, which stabilised in 2020.</p> <p>Work to promote Ipswich jobs includes the adoption of the new Local Plan in March 2022, which allocates a range of sites for employment development, and publication of a new prospectus of investment sites in October 2022, to help attract companies to invest in Ipswich. A launch event,</p>
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Core Strategy Target	Progress in 2021-22	Commentary
		held at Ipswich Town Football Club (ITFC), in collaboration with Suffolk Chamber of Commerce saw over 60 businesses from around Ipswich come together to see first version of the new brochure: 'Ipswich: Looking to Do Business With You'.
Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres.	Of the 171 new homes completed in the 2021-22 monitoring period 93% were constructed on previously developed land; 57% were completed within the IP-One area; and 93.6% (160 dwellings) were built within 800 metres of a District Centre and/or the Central Shopping Area.	The Council is meeting its targets in terms of the percentage of new homes delivered on previously developed land and the percentage of homes built within 800 metres of a District Centre and the Central Shopping Area. The Council has not met its target for the percentage of homes delivered within the IP-One area. The spatial strategy for the 2022 Local Plan continues to focus development on central Ipswich and the Council has strengthened the status afforded to the IP-One Area Action Plan. It is hoped that this, alongside other measures being taken forward by the Council, will help in meeting the target for the percentage of houses delivered in the IP-One Area.
To improve the retail ranking of Ipswich by 2031 and complete the 'green rim'.	<p>The Council carried out survey work to determine occupancy rates and mix of uses within the Town Centre in June 2022 (at the end of the monitoring period), however as the Council was unable to carry out any onsite monitoring work during 2020 and 2021 due to the Coronavirus pandemic, the data is missing from these two monitoring years. The Council reported on footfall data for the Town Centre for the 2019/20 monitoring period, and this has also been updated with the figures from the 2021/22 monitoring period. The available evidence suggests that in 2021/22 Ipswich Town Centre was performing marginally better than in the 2019/20 monitoring year, with a 0.1% increase in total occupancy. The Secondary and Specialist Shopping Areas performed well, with occupancy levels notably improved (10% and 11% vacancy respectively) compared to rates in 2019. The Primary Shopping Area performed less well (at 21% vacancy). However, this is likely due to wider structural changes within the retail multiple sector.</p> <p>Work is ongoing to deliver the new country park at Ipswich Garden Suburb. Land has been allocated for development at Humber Doucy Lane through the new Local Plan and it will include links to the 'green trail' walking and cycling route.</p>	<p>The Retail Survey work in the Central Shopping Area was complicated by the move to retail use Class E in September 2020, making comparative use class assessment challenging. The overall average figure for Class E across the 3 shopping zones was 85.7% of the frontage calculation, with SG uses at an average of 12.1%</p> <p>The green rim is being implemented as opportunities arise, e.g. through the country park at the Ipswich Garden Suburb.</p>

Core Strategy Target	Progress in 2021-22	Commentary
To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2021.	The 2021 Travel to Work Survey results showed that, of the baseline employers (those who have taken part in the survey since it was first run in 2005), on average 54.4% of employees travelled to work by car (either as a single occupant or car share). 2021 shows that the number of people working from home this year is still high, but less than it was reported in 2020.	Although the 2021 Travel to Work results show that driving remains the most frequently used mode of travel, there is still quite a high number of people working from home this year, although fewer than reported in 2020. The County Council's Local Transport Plan and the Ipswich Borough Local Plan include consideration of sustainable travel.
Implementation of tidal surge barrier by 2017.	The tidal surge barrier was completed in February 2019.	n/a
<p>To increase the tree canopy cover in the Borough to 22% by 2050.</p> <p>No net loss of natural capital by 2031.</p> <p>A decrease in the number of Ipswich buildings at risk on the Suffolk Buildings at Risk register or no net increase in Ipswich buildings at risk.</p> <p>A decrease in Heritage Assets at risk on the Historic England register or no net increase in Heritage Assets at risk.</p>	<p>The tree canopy cover target has increased from 15% canopy cover in the Borough by 2021 to 22% by 2050. In 2019 the Council achieved 15.5% tree canopy cover.</p> <p>In 2020-21 5 buildings were considered to be at risk, 1-5 College Street, 4 College Street, St Michael's Church, County Hall and the Tolly Cobbold Brewery.</p> <p>There is 1 building on the Historic England, Heritage at Risk Register: the Unitarian Chapel, Friars Street.</p>	<p>Ipswich Borough Council has signed up to the Charter for Trees in conjunction with the Woodland Trust. The Charter's ambition is to place trees and woods at the centre of national decision making.</p> <p>There has been no net increase in the number of buildings considered to be at risk in the monitoring period and dedicated work is being undertaken with the owners of each building. No. 4 College Street is IBC owned and a comprehensive conservation and renewal plan is being prepared.</p> <p>Formal urgent works engagement has been undertaken with the owners of County Hall and Cliff Brewery.</p>
High quality community infrastructure (indicators of average class size and the percentage of new community facilities located within 800m of Local and District Centres).	Class sizes in nursery and primary schools appear to have decreased to a ratio of 21.6 FTE pupils to teachers in 2021 from 22.4 FTE pupils in 2020. Secondary schools appear to have increased to 18.4 FTE pupils in 2021 from 18.2 FTE pupils in 2020	In 2021, both nursery and primary school averages along with secondary school averages appear to be higher than the national averages, which are 21.5 and 17.1 respectively.
To improve Ipswich's ranking in the indices of multiple deprivation by 2031.	Ipswich currently ranks 71st (2019) in the indices of multiple deprivation having previously ranked 74 th in 2015 and 83 rd in 2010. Comparatively, Suffolk is the 53rd least deprived upper tier authority out of 151. The Indices of Deprivation 2019 Summary, published by Suffolk County Council, indicates that Ipswich is the most relatively deprived Authority within Suffolk.	The 2019 Indices of Multiple Deprivation Data are the latest available statistics. A report published by the Child Poverty Action Group and the Church of England in September 2020, titled 'Poverty in the Pandemic: The Impact of Coronavirus on Low-income Families and Children', suggests that around 8 in 10 respondents reported a significant deterioration in their living standards due to a combination of falling income and rising expenditure.

Core Strategy Target	Progress in 2021-22	Commentary
<p>To tie in with Police targets relating to reducing crime levels by 2031.</p>	<p>The recorded crime figures for 2021/22 were:</p> <p>Violence with Injury – 1537 Sexual offences – 690 Burglary – 386 (domestic burglary data no longer recorded) Robbery – 129</p>	<p>The Council is continuing to work with local police and community partners to ensure that appropriate opportunities to design out crime have been taken prior to the commencement of any project and as part of the on-going management of any open spaces, sport or recreational facilities.</p>
<p>To achieve effective cross boundary working on housing, strategic greenspace and employment site provision.</p>	<p>Ipswich has worked in partnership with neighbouring authorities within the Ipswich Strategic Housing Market Area to progress the production of documents such as the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and Local Transport Modelling.</p>	<p>Ipswich continues to work with its partners. The Ipswich Strategic Planning Area (ISPA) Statement of Common Ground has been updated to respond to the progression of the Local Plans (see Version 7 March 2021), the production and updating of evidence and changes in national policy and guidance.</p> <p>The Ipswich Statement of Compliance with the Duty to Co-operate (June 2020) demonstrates how Ipswich Borough Council has working proactively with external organisations including neighbouring authorities and public bodies. The Statement of Compliance with the Duty to Cooperate is available to view here.</p>

How many homes were built between April 2021 and March 2022?

171 dwellings (net) were completed between 1st April 2021 and 31st March 2022, 34 of which were affordable housing completions (19.8%). 159 of these dwellings were on previously developed land (93%) and 98 were within the central IP-One area (57.3%). Gross housing completions (before calculating those dwellings lost) was 185.

The number of housing completions (171 dwellings) decreased by 150 dwellings from the 2020/21 figure. This represents under delivery against the requirement of both the superseded 2017 Local Plan (489 dwellings p.a.) and its replacement, the new Local Plan adopted in March 2022 with a housing requirement for 2021-22 of 300 dwellings p.a. from a baseline date of 2018.

The Housing Delivery Action Plan published in 2022 included 'Root Cause Analysis' of housing under-delivery in Ipswich and identified six factors which are currently combining to affect delivery rates:

- The tight, compact urban nature of the Borough (which constrains the range of housing sites available);
- The higher cost of development and lower land values;
- Low private sector delivery levels of affordable housing;
- The inability of the local planning authority to incentivise delivery of housing, or sanction non-delivery;
- Reliance on higher density brownfield sites, including flatted development which has proved less popular in the market following the Covid Pandemic; and
- The presence of greenfield sites, which offer fewer constraints, outside the Borough boundary (e.g. completions in the 'Ipswich fringe' within Babergh District have increased from 0 in 2017-18 to 94 in 2021-22).

Macro-economic factors may also be at play, such as rising interest rates, global commodity prices, trade frictions and the effects of war and sanctions. However, nationally, completions rose over the monitoring period.

The Council is addressing delivery issues through actions including facilitating development at Ipswich Garden Suburb; making funding bids (such as the successful Housing Infrastructure Fund bid for Ipswich Garden Suburb); Capacity Pilot Partnership with Homes England to help bring forward market failed brownfield sites; and direct delivery through the Council's own home building programme.

The Council is working hard to support house building across the Borough. The adoption in March 2022 of the Ipswich Local Plan 2018-2036 will offer greater certainty to the development sector. The Council is continuing to progress work on Ipswich Garden Suburb, which will provide up to 3,500 new homes and associated infrastructure. The Council was successful in its bid to Homes England for £9.8m of Housing Infrastructure Funding (HIF) through the Marginal Viability Funding route.

Affordable housing completions vary from year to year, influenced by the availability of funding. Ipswich Borough Council continues to progress a programme of affordable house building across 20 plus sites in the Borough and has an aspiration to develop 1,000 new affordable homes within a decade. During this monitoring period, the Council actively pursued its own development sites. Completions were delivered on former garage court sites at Mallard Way and Sheldrake Drive (6 and 8 dwellings respectively); Whitton Church Lane (8), Emmanuel Close (6), Coltsfoot Road (3) and Halton Crescent (1). Construction work was underway on 16 flats at 28-50 Grimwade Street (reference IP386), Ravenswood UVW (reference IP150a) was at post-planning stage and the site of the former BT office at Bibb Way (reference IP279) was in the development management process.

How much housing land is there in Ipswich and how long can Ipswich supply housing?

The Council is required by the 2021 National Planning Policy Framework (NPPF) to boost the supply of housing to meet the objectively assessed housing needs for market and affordable housing in the housing market area. Ipswich Borough Council's area is within the Ipswich housing market area identified in the Strategic Housing Market Assessment (published May 2017).

Ipswich Borough Council adopted a new Local Plan in March 2022. It is relevant to this AMR, because it updated the Ipswich housing requirement using a baseline date of 2018. Therefore, the up to date and appropriate measure of five year housing land supply at 1st April 2022 is based on the newly adopted housing requirement figure. **The Council's five year housing land supply amounts to 2,849 dwellings for the period from 2022-23 to 2026-27 which equates to 5.2 years' supply.** The sites which constitute the five year housing land supply are itemised through the housing trajectory at Appendix 3.

Does Ipswich have any Neighbourhood Plans?

Neighbourhood planning is a Government initiative that enables local communities to influence and take forward planning proposals at a local level. Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use.

Ipswich has no adopted neighbourhood plans and no current area or forum applications.

Has Ipswich implemented the Community Infrastructure Levy?

The Community Infrastructure Levy (CIL) is a planning charge that allows local authorities to raise contributions from the most viable forms of development to help pay for pre-identified infrastructure projects. The legislation which governs CIL is clear that, in setting the charge, local planning authorities should have regard to its effect upon the economic viability of development across the area and therefore on the delivery of the Local Plan.

The Council consulted on a preliminary draft charging schedule from December 2013 to January 2014. However, since 2014, the project has been held in abeyance whilst the Council considers how it may take CIL forward. The 2015 Local Development Scheme identifies a timetable for progressing the CIL beginning from December 2015 with adoption in July 2017 but this has not taken place.

This matter has not been progressed owing to the publication of the Housing White Paper 'Fixing our Broken Housing Market' February 2017 and the Government's commitment to review the current system of developer contributions. The government has further signalled its intention to reform and streamline developer contributions through the 'Planning for the Future' White Paper published August 2020. Future infrastructure funding will be considered when more information is known about the government's plans for reforming developer contributions. In the meantime, Section 106 of the Town and Country Planning Act is the Council's preferred approach to securing high-quality mitigation to make proposals acceptable. The 2021 Housing Delivery Action Plan identified reviewing S106 procedures and appointing a Monitoring Officer as an identified action to improve housing delivery. The Council has now appointed a dedicated S106 Monitoring Officer to support the delivery of planning services.

During 2021/2022 the Council published its second Infrastructure Funding Statement. The report provides information on the monetary (and non-monetary) contributions sought and received from developers for the provision of infrastructure to support development in Ipswich. The report is available to view [here](#).

How has Ipswich Borough Council worked with other Local Planning Authorities?

The Duty to Co-operate ('the duty') was introduced through Section 110 of the Localism Act 2011 in November 2011. The Act inserted a new Section 33A into the Planning and Compulsory Purchase Act 2004. The duty is a legal duty on local planning authorities to co-operate constructively, actively and on an ongoing basis with neighbouring authorities, County Councils, and other prescribed bodies in planning for strategic cross-boundary matters.

The National Planning Policy Framework (NPPF) 2021 paragraph 24 states that "*Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries*".

The Council has a long history of working collaboratively with neighbouring District Councils and the County Council on planning matters such as production of evidence base documents, particularly through the Ipswich Strategic Planning Area (ISPA) (formerly the Ipswich Policy Area). Future development needs of the ISPA are discussed at a political level through the ISPA Board. The Council has also had, and continues to have, on-going dialogue with statutory agencies including: Anglian Water; Historic England; the Environment Agency; and Natural England through the Local Plan preparation process. Chapter 5 shows how the Council has engaged with others during the 2021/22 monitoring period to address strategic priorities.

CHAPTER 1:

INTRODUCTION

- 1.1 This is Ipswich Borough Council's eighteenth Authority Monitoring Report (AMR) and is produced in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), hereinafter referred to as 'the Regulations'. This AMR is required by Section 35 of the Planning and Compulsory Purchase Act 2004 (as amended).
- 1.2 This report covers the monitoring period April 2021 to March 2022. It also refers to some wider policy developments up until the date of publication of the report, for context.
- 1.3 Monitoring is an essential element of policy making. The main function of the AMR is to provide evidence of policy implementation and review the effectiveness of policies, give an update of the progress in document preparation (development plan documents and supplementary planning documents), and to report on the delivery of housing and employment floor space. The AMR is the main mechanism for assessing the performance of the Ipswich Local Plan.
- 1.4 The Localism Act 2011 allows local authorities to have a more flexible approach to the information that is included within their AMR and the dates when it can be published. As such, the requirements from the Government, (as detailed in Regulation 34), are to report on six set indicators, where applicable, and to make the report available. Below is a summary of where each of the requirements for monitoring are presented in this report:
- **Regulation 34(1) Progress in relation to documents in the Local Development Scheme:** See chapter 2.
 - **Regulation 34(2) Policy Implementation:** See chapter 3.
 - **Regulation 34(3) Housing and affordable housing completions:** See chapter 3.
 - **Regulation 34(4) Details of Neighbourhood Development Orders or Neighbourhood Plans:** None within Ipswich.
 - **Regulation 34(5) Community Infrastructure Levy (CIL) receipts and expenditure data where a CIL report has been prepared:** The Council's position on CIL is contained in chapter 2.
 - **Regulations 34(6) Evidence of co-operation between Ipswich Borough Council and other local planning authorities, and the County Council:** A Duty to Co-operate Statement was published as part of the preparation of the emerging Ipswich Local Plan Review 2018-2036. The document is available via the Core Document Library Reference A13. A Statement of Common Ground between the Council and neighbouring authorities was published in March 2021. See chapter 4.
 - **Regulation 34(7) Availability of information collected for monitoring purposes:** The AMR is published annually.

CHAPTER 2:

LOCAL DEVELOPMENT SCHEME

- 2.1 The Council's Local Development Scheme (LDS) details the planning documents the Council intends to produce over a three-year period.
- 2.2 This chapter discusses the progress the Council has made in production of these documents between April 2020 and March 2021.

Where is Ipswich Borough Council in the Local Plan Process?

- 2.3 On 23 March 2022, Ipswich Borough Council adopted the Ipswich Local Plan Review 2018-2036, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan is a full review of the 2017 Ipswich Local Plan Review (the 2017 Plan), which it replaces entirely. The Plan comprises the following documents:
- **Core Strategy and Policies Development Plan Document (DPD) Review:** This is a strategic document setting out the vision, objectives and spatial planning strategy for the Borough of Ipswich up to 2036, and contains policies to facilitate sustainable development;
 - **Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD:** This allocates sites for development and identifies sites or areas for protection across the whole of the Borough; and
 - **Policies Map and IP-One Area Action Plan Inset Policies Map:** These maps illustrate geographically the application of the policies and proposals in the adopted development plan.

Joint or Aligned Local Plan

- 2.4 The ISPA local planning authorities are producing plans as follows:
- Babergh and Mid Suffolk Joint Local Plan
 - Ipswich Local Plan
 - Suffolk Coastal Local Plan (an area now forming part of the East Suffolk District Council – an amalgam of Suffolk Coastal and Waveney Districts).
- 2.5 As the local plans cover the extent of the Ipswich Strategic Planning Area, and share joint evidence in this respect, it is considered appropriate that the plans cover the same end date of 2036 and are produced to timescales which are aligned as far as is possible. All authorities undertook Issues and Options consultations during summer / autumn 2017. As at 31 March 2022, the current position in relation to the production of each local plan is as follows:
- Ipswich Local Plan – On 23 March 2022, Ipswich Borough Council adopted the Ipswich Local Plan Review 2018-2036, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
 - Babergh and Mid Suffolk Joint Local Plan – Examination hearings took place in June, September and October 2021. An Exploratory Meeting was held in December 2021, and it was proposed that the Joint Local Plan be split into two parts. Consultation on Modifications to the Joint Local Plan is programmed for the

autumn of 2022 with adoption of Part 1 programmed for December 2023. The Part 2 Plan is programmed to start in the January 2024 this will largely relate to site allocations.

- Suffolk Coastal Local Plan – The Suffolk Coastal Local Plan was formally adopted on the 23 September 2020 and the Waveney Local Plan was formally adopted on the 20th March 2019. East Suffolk Council is looking to prepare a single plan which covers the former Suffolk Coastal and Waveney districts.

2.6 **Supplementary Planning Documents (SPD)**

SPDs are not required to be included in a Local Development Scheme (LDS) and this allows new SPDs to be prepared in response to needs being identified. However, where they are anticipated as being of particular importance, they are included in the LDS for completeness.

2.7 **Reptile Strategy SPD**

On 28 July 2021, Ipswich Borough Council adopted the Reptile Strategy SPD. The SPD provides a planned approach to translocation of reptiles by identifying potential receptor sites in advance and developing a clear delivery strategy including ongoing monitoring and site management. This is essential to support much needed housing delivery in the Borough and to protect existing reptile populations.

The November 2020 LDS identifies consultation on a draft Reptile Strategy SPD during July and August 2020 with adoption in February 2021.

(https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_local_development_scheme_18_nov_2020_work_schedule_0.pdf).

2.8 **Low-Emissions SPD (incorporating Parking Standards for the IP-One Area) (formerly a called the Low Emissions Strategy SPD)**

On 17 November 2021, Ipswich Borough Council adopted the Low-Emissions SPD (incorporating Parking Standards for the IP-One Area). The 2019 Local Development Scheme combined the Parking Guidance for the IP-One Area SPD into the Low Emissions SPD (incorporating Parking Standards for the IP-One Area). The reasoning is to ensure that the approach to parking provision in new development in central Ipswich should not undermine actions to improve air pollution levels in the Ipswich Air Quality Management Areas.

The SPD sets out guidance on assessing the air quality impacts of developments and provides a package of measures to mitigate the air quality impacts of development. The primary aim is to encourage and facilitate the uptake of cleaner vehicle fuels and technologies in and around development sites and to promote modal shift away from the car. Parking guidance for the IP-One Area is also be set out in the Low Emissions SPD, to ensure that the approach to parking in central Ipswich does not undermine actions to support modal shift.

2.9 **Development and Flood Risk SPD**

On 27 July 2022, Ipswich Borough Council (IBC) adopted the Development and Flood Risk Supplementary Planning Document ('SPD'). The purpose of the Development and Flood Risk Supplementary Planning Document (SPD) is to help developers and their agents to submit appropriate flood risk and flood risk management information with planning applications in Ipswich.

The SPD was prepared by Ipswich Borough Council (IBC) in collaboration with The Environment Agency, Suffolk County Council in their capacity as the Lead Local Flood Authority (LLFA), Suffolk Joint Emergency Planning Unit and Anglian Water. It updates and replaces the Development and Flood Risk SPD published in 2013 and updated in 2016 and reflects the updated Ipswich Strategic Flood Risk Assessment (SFRA) October 2020 (Core Document Reference I34-I34.101).

2.10 Local List (Buildings and Townscapes of Interest) SPD Review

On the 28 July 2021, Ipswich Borough Council adopted the Local List SPD. The SPD raises awareness of the many locally notable historic assets which make up the historic environment of our town and supports the Council's Core Strategies and Development Management Policies in the adopted Local Plan.

The Local List (Buildings of Townscape Interest) SPD was first adopted in 2013, with amendments added in 2016. Since adoption of the 2013 Local List (Buildings of Townscape Interest) SPD, the list has been reviewed every 3 years, considering the appropriateness of existing entries, removing entries where sites have been upgraded to receive statutory protection, and adding further buildings and structures worthy of inclusion.

The Council conducted an 8 week public consultation to seek comments on the proposed additions, amendments and removals from the Local List (Buildings of Townscape Interest) SPD, between 06 October 2020 until 08 December 2020. The SPD was formally adopted on the 28 July 2021.

2.11 Community Infrastructure Levy (CIL) Charging Schedule

This matter has not been progressed further owing to the publication of the Housing White Paper 'Fixing our Broken Housing Market' February 2017 and the Government's commitment to review the current system of developer contributions. The government has further signalled its intention to reform and streamline developer contributions through the 'Planning for the Future' White Paper published August 2020.

Future infrastructure funding will be considered when more information is known about the government's plans for reforming developer contributions. In the meantime, Section 106 of the Town and Country Planning Act is the Council's preferred approach to securing high-quality mitigation to make proposals. During 2021/2022, the Council published its second Infrastructure Funding Statement. The report provides information on the monetary (and non-monetary) contributions sought and received from developers for the provision of infrastructure to support development in Ipswich. The report is available to view [here](#).

CHAPTER 3: POLICY IMPLEMENTATION

- 3.1 This chapter considers the extent to which planning policies are being implemented, with a particular focus on housing policies.

Housing

- 3.2 Regulation 34(3) of the 2012 Regulations (as amended) requires local authorities to report on housing completions. The delivery of housing is of considerable importance to achieving the aims of the Ipswich Local Plan. Objective 3 of the Local Plan seeks to address identified local housing needs and provide a decent home for everyone.

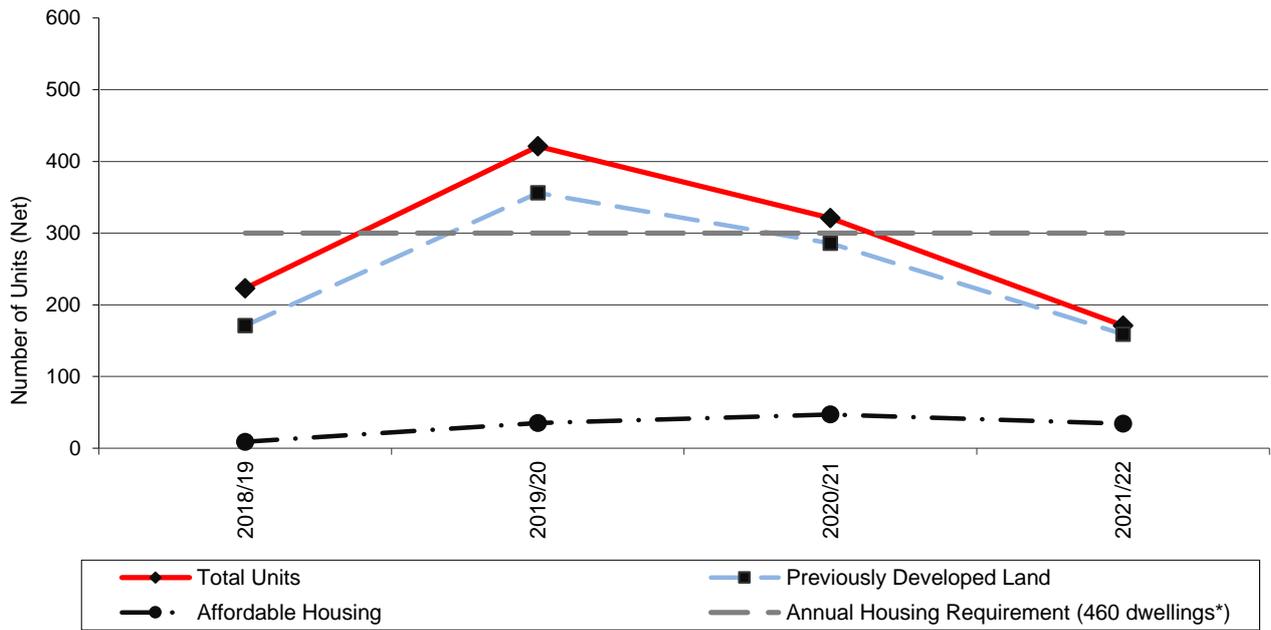
- 3.3 The National Planning Policy Framework (NPPF) requires local planning authorities to meet their individual objectively assessed housing need. For Ipswich, the requirement set out in the Ipswich Local Plan 2011-2031 was 489 dwellings per annum backdated to a 2011 base date, due to a change in the national calculation methodology.

- 3.4 Through the newly adopted Ipswich Local Plan 2022, the Council has a requirement to deliver 460 dwellings per annum over 18 years from 2018 to 2036. This requirement has been stepped (Policy CS7, Ipswich Core Strategy and Policies DPD) to reflect the period when delivery from the strategic site at Ipswich Garden Suburb and the northern end of Humber Doucy Lane is due to take place. Thus, the housing completions 2018-2021 will be assessed against the stepped housing requirement of 300 dwellings per annum (p.a.), and the five year housing land supply will be assessed against the stepped housing requirement as follows:

2022-2023 - 300 dwellings p.a.
2023-2024 - 300 dwellings p.a.
2024-2025 - 540 dwellings p.a.
2025-2026 - 540 dwellings p.a.
2025-2027 - 540 dwellings p.a.

- 3.5 Between 1st April 2018 and 31st March 2022, 1,136 dwellings were completed (including assisted living dwellings), which has resulted in a deficit of 64 dwellings over the stepped requirement for 1,200 dwellings over the four years, 2018-2022.
- 3.6 Housing completions for the 2021-2022 monitoring period totalled 171 new homes, which is down on the previous period (321 completions in 2020-2021). No care homes, student accommodation or assisted living units were built in Ipswich during this period. Of the homes completed in Ipswich during 2021-22, 93% were constructed on previously developed land and 57% were within the IP-One area. The level of affordable housing provision amounted to 34 dwellings (19.9% of completions), which is above the target established within the Core Strategy (15%). The level of windfall development on sites not previously identified by the Council was 93 dwellings, of which 22 resulted from permitted development applications.
- 3.7 Figure 3.1 shows net housing completions in Ipswich from 1st April 2018 to 31st March 2022. Figure 3.2 shows net housing completions from 2018 to 2022 and projections of estimated annual housing delivery (net additional dwellings) up to 2036. The full list of sites can be viewed in the Council's detailed housing trajectory in the Appendices (Table 18, Appendix 3). Please note that historic completions shown in the graph have been updated to include assisted living units in line with the national Planning Practice Guidance.

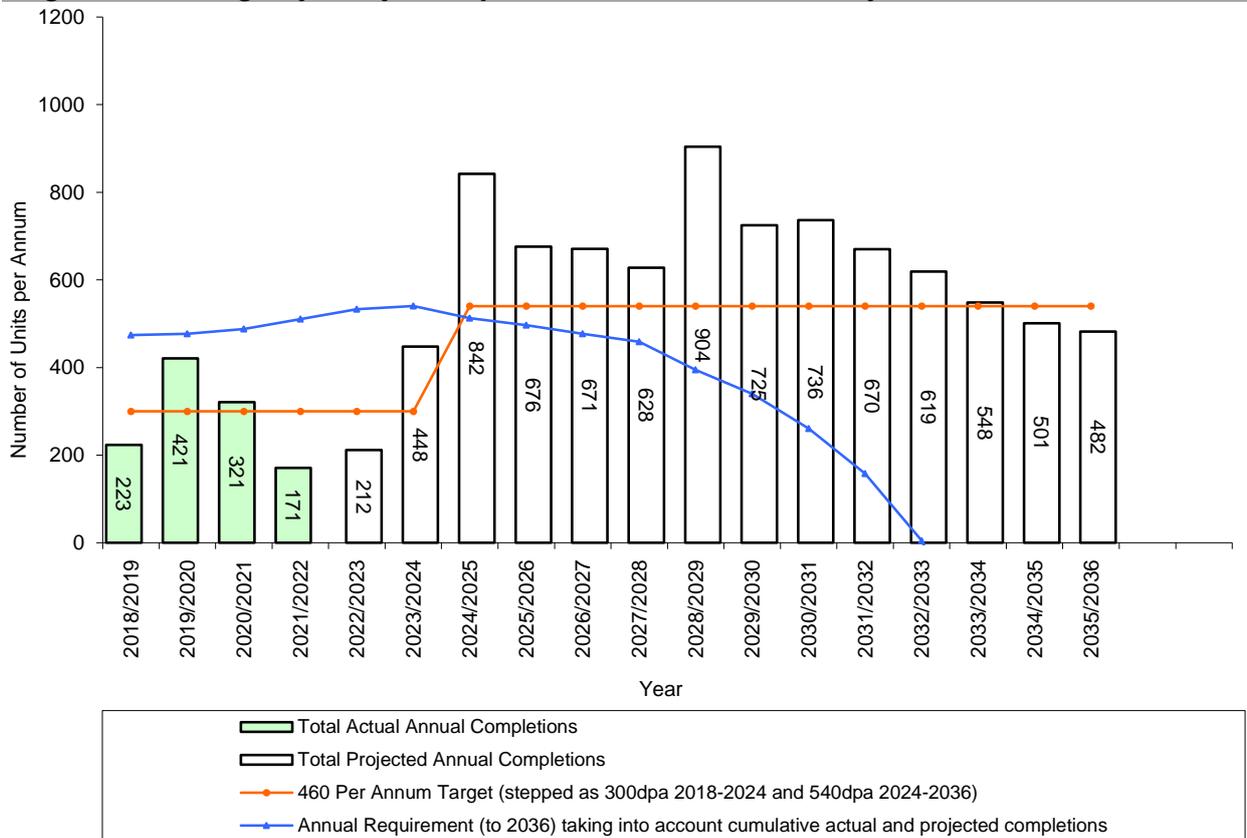
Fig 3.1 - Net housing completions in Ipswich from 1st April 2018 – 31st March 2022



* Stepped annual housing requirement of 300 dwellings per annum 2018/19 to 2023/24 and 540 dpa 2024/25 to 2035/36

3.8 The housing trajectory (figure 3.2) has been informed by discussions with agents, developers, landowners, planning colleagues and other internal Council departments, as well as the Strategic Housing and Economic Land Availability Assessment (SHELAA).

Fig 3.2 - Housing trajectory: Completions since 2018 and Projections to 2036



- 3.9 The Council is also required to identify and update annually a supply of specific sites, to meet five years' worth of housing against its annual housing requirement plus an additional buffer of 20% required because of previous under-delivery.
- 3.10 Figure 3.3 shows the Council's five year housing requirement and supply as calculated against the 2022 Local Plan which covers the period from 2018 to 2036.

Table 3/Fig 3.3 – Summary table of five year housing requirement and supply 2022-2027		
A	Plan Requirement 2018 – 2036 (460 x 18 years) stepped as follows: 2018-2024: 300 dwellings p.a. 2024-2036: 540 dwelling p.a.	8,280
B	Net additional dwellings delivered 1 st April 2018 – 31 st March 2022 (223+421+321+171)	1,136
C	Shortfall/Surplus = Requirement 2018/19 – 2021/22 1,200 (4 x 300) – B (1,136) = -64 deficit	64
D	5 year requirement based on stepped trajectory 2022/23 to 2026/27 300dpa x 2 yrs (600) and 540dpa x 3 yrs (1,620)	2,220
E	5 Year requirement (D + C)	2,284
F	Add 20% buffer (E x 1.2)	2,740.8
G	Annual requirement for 5 years (F/5)	548.2
H	Total Ipswich housing supply 2022/23 to 2026/27	2,849
I	Ipswich Borough Council housing supply in years (Line H / Line G)	5.2 years

- 3.11 Ipswich Borough sits within the wider Ipswich Housing Market Area (IHMA) and it is therefore useful to consider housing supply in the context of the surrounding authority areas of Babergh, Mid-Suffolk and East Suffolk which make up the IHMA. The 2021-2022 Statements of Housing Land Supply relating to these authority areas can be viewed at:

- Babergh and Mid Suffolk Draft Five Year Land Supply Position Statement 2022 <https://www.babergh.gov.uk/planning/planning-policy/evidence-base/annual-monitoring-report/> This reports a 7.13 year supply for Babergh and a 10.88 year supply for Mid Suffolk.
- East Suffolk Statement of Housing Land Supply as at 31 March 2022: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Housing-Land-Supply/Housing-Land-Supply-Statement-2022.pdf> This reports a 6.47 year supply for the Suffolk Coastal Local Plan area.

Policy usage

- 3.12 The table below shows the usage of Local Plan policies. As the focus of this AMR is the period from 1 April 2021 to 31 March 2022 inclusive, the analysis below will be based on the policies contained in the 2017 Core Strategy and Policies Development Plan Document, which was the Local Plan in use for all but the final week of the monitoring period. Policy CS9 was deleted as part of the previous Core Strategy Review.

Table 3: Core Strategy Policy Usage

Policy	Frequency	Policy	Frequency
CS1	22	CS11	0
CS2	58	CS12	3
CS3	9	CS13	8
CS4	58	CS14	4
CS5	23	CS15	7
CS6	0	CS16	7
CS7	43	CS17	15
CS8	5	CS18	0
CS9	0 Deleted	CS19	5
CS10	7	CS20	0
		Total	274

3.13 The table above indicates that a number of policies have not been used in making planning application decisions. However, these strategic policies are not necessarily appropriate for use in development management decisions. The ensuing list explains how these policies have been implemented. Four of them were also identified in the previous AMR and therefore it is important to understand how they are being used.

- CS6 – The Ipswich Policy Area – This policy refers to joint working and the coordination of planning policies around the fringes of Ipswich, in order to deliver appropriate development. Ipswich continues to work closely with its neighbouring authorities on strategic planning matters, as discussed in Chapters 1 and 4 of this report.
- CS11 – Gypsy and Traveller Accommodation – Policy CS11 seeks to meet the needs of Gypsies and Travellers for accommodation in Ipswich and defines a set of criteria against which application for the provision of permanent pitches will be assessed. The policy has not been used in decision making during 2021/2022, as no applications were received for Gypsy and Traveller accommodation during this monitoring period. The Council is working collaboratively with the other ISPA local authorities. A joint [Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment](#) (ANA) was undertaken in May 2017, which was updated with new evidence in October 2020. The newly adopted 2022 Ipswich Local Plan allocates land at West Meadows to meet the permanent accommodation needs of Gypsies and Travellers over the plan period. The Plan also supports the delivery of small sites to meet permanent accommodation needs. Any application would be assessed against the criteria set out in Policy CS11 of the 2022 Ipswich Local Plan. With regard to transit pitches, the Statement of Common Ground between the ISPA authorities (Core Document reference A21) confirms that work is proceeding to identify and deliver appropriate sites.
- CS18 – Strategic Flood Defence – The Council continues to work with partners to implement the Ipswich Flood Defence Management Strategy as a key piece of infrastructure needed to support regeneration in Ipswich. This policy links closely with policy CS17, as the flood defences are a key piece of strategic infrastructure needed to enable the continued growth and regeneration of the town. The tidal barrier was completed in February 2019.

- CS20 – The Council continues to work with the Highway Authority, Suffolk County Council, on delivering modal shift – getting people to use alternatives to the car for shorter journeys and reducing congestion. The Suffolk Local Transport Plan, which sets out long-term ambitions for the transport network of the county, is currently under review.

3.14 The table below shows the frequency with which the development management policies have been used.

Table 4: Development Management Policy Usage

Policy	Frequency	Policy	Frequency	Policy	Frequency
DM1	79	DM12	298	DM23	9
DM2	23	DM13	22	DM24	0 (Deleted)
DM3	49	DM14	2	DM25	8
DM4	85	DM15	0 (Deleted)	DM26	207
DM5	486	DM16	0 (Deleted)	DM27	2
DM6	2	DM17	139	DM28	4
DM7	0 (Deleted)	DM18	123	DM29	7
DM8	197	DM19	0 (Deleted)	DM30	44
DM9	6	DM20	5	DM31	92
DM10	204	DM21	5	DM32	8
DM11	0 (Deleted)	DM22	7	DM33	14
				DM34	2
				Total	2,129

3.15 All development management policies were used during 2021/22. The usage of development management policies is a helpful indicator to use in reviewing policy. The 2023 AMR will switch to assessing use of the newly adopted 2022 Ipswich Local Plan policies.

CHAPTER 4: PERFORMANCE AGAINST OUR PLAN OBJECTIVES

4.1 This chapter summarises the progress against the 12 objectives set out in chapter 11 of the 2017 Local Plan. The 12 strategic objectives have been updated in the 2022 Core Strategy. However, during this monitoring year, performance will be assessed against the objectives in the 2017 Local Plan as these were in use during the 2021-2022 monitoring period. In the 2022/23 AMR, implementation will be assessed against the objectives in the 2022 Core Strategy.

The objectives are listed below along with the supporting target(s):

- Objective 1. High standards of design will be required in new development. Development must be sustainable, environmentally friendly and resilient to the effects of climate change. Standards of acceptability will be raised progressively from 2006 (Building Regulations) levels for all developments in the town in terms of design and environmental performance.
- a. TARGET: At least 75% of new dwellings gaining planning permission in any year to achieve Levels as set out in Policy DM1.
- Objective 2. Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.
- b. TARGET: To reduce Ipswich's estimated carbon footprint by 60% from the 2004 base level (Cred) by 2025.
- Objective 3. At least: (a) 9,777 new dwellings shall be provided to meet the needs of Ipswich within the Ipswich Housing Market Area between 2011 and 2031 in a manner that addresses identified local housing needs and provides a decent home for everyone, with 31% at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes; and (b) approximately 12,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Policy Area between 2011 and 2031.
- c. TARGET: To deliver at least (a) 9,777 homes by 2031 and approximately (b) 12,500 jobs by 2031.
- Objective 4. The development of the Borough should be focused primarily within the central Ipswich "IP-One" area, Ipswich Garden Suburb and within and adjacent to identified district centres (these areas are identified on the Key Diagram).
- d. TARGET: Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres.
- Objective 5. Opportunities shall be provided to improve strategic facilities in Ipswich by:
- Significantly enhancing the town centre in terms of the quantity and quality of the shops, the cultural offer and the network of public spaces;
 - Extending the strategic greenspace, ecological network and canopy cover; and
 - Continuing to support the development of the University of Suffolk and Suffolk New College.

e. TARGET: To improve the retail rank of Ipswich by 2031 and complete the 'green rim'.

Objective 6. To improve accessibility to and the convenience of all forms of transport, and achieve significant modal shift from the car to more sustainable modes through Travel Ipswich and other local initiatives. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative 'green' non-vehicular access around the town and urban greening of existing routes. Specifically:

- Significant improvements should take place to the accessibility to and between the three key nodes of: the railway station (including the wider Ipswich Village environment), the Waterfront (and particularly the Education Quarter) and the Central Shopping Area;
- Additional east-west highway capacity could be provided within the plan period in the Ipswich area to meet the needs of the wider population and to provide the potential to reallocate some central road space;
- Comprehensive cycle routes should be provided; and
- Ipswich Borough Council aspires to an enhanced public transport system.

f. TARGET: To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031.

Objective 7. Enhanced flood protection including a tidal surge barrier should be in place to protect the town's existing and expanding communities from the threat of tidal flooding.

g. TARGET: Implementation of the tidal surge barrier by the end of 2017.

Objective 8. To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and conserve and enhance the historic environment and landscape of Ipswich, including historic buildings, archaeology and townscape.

h. TARGETS:

- Net change in extent of protected habitat.
- Number of buildings on Suffolk Buildings at Risk register.
- Number of buildings and conservation areas on the Historic England Heritage at Risk register.

Objective 9. To retain and provide high quality schools, health facilities, sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth and ageing population.

i. TARGET: To be developed but will meet the requirements for new provision set out within the indicators.

Objective 10. To tackle deprivation and inequalities across the town.

j. TARGET: To improve Ipswich's rank in the indices of multiple deprivation by 2031.

Objective 11. To improve air quality and create a safer, greener more cohesive town.

k. TARGETS: To tie in with Police targets relating to reducing crime levels by 2031
To achieve a 75 percent reduction in the number of air quality exceedances recorded annually in Ipswich by 2031**.

**At the beginning of the plan period (2011), Ipswich recorded 27 air quality exceedances after bias adjustment.

Objective 12. To work with other local authorities in the Ipswich Policy Area (now the Ipswich Strategic Planning Area) and with community partners to ensure a co-ordinated approach to planning and development.

l. TARGET: To achieve effective cross boundary working on housing, strategic greenspace and employment site provision.

Table 5 Progress against the Targets in the 2017 Core Strategy

2011 Core Strategy Objectives/Targets	On track?	Progress in 2021-2022	Commentary
<p>High standards of design will be required in new development. Development must be sustainable, environmentally friendly and resilient to the effects of climate change. Standards of acceptability will be raised progressively from 2006 (Building Regulations) levels for all developments in the town in terms of design and environmental performance.</p>		<p>Policy DM1 was used 79 times in planning application decisions. More recently, applications use the new water/energy requirements as set out in the now adopted 2022 Local Plan. The Council will expect new build residential development to achieve a 19% improvement in energy efficiency over the 2013 Target Emissions Rate. This is equivalent to meeting the Code 4 energy efficiency requirement.</p>	<p>The Code for Sustainable Homes was withdrawn in 2015 and the Local Plan has been revised to reflect this, although it retains certain water and energy efficiency measures. Since the removal of the Code, some developers have applied to remove the specific conditions from their planning permissions.</p>
<p>Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.</p>		<p>During 2020 carbon emissions from industry and commercial, domestic and transport sectors in Ipswich all reduced. CO₂ emissions per capita also reduced in Ipswich to a low of 2.7 CO₂(t). This is the latest available data on carbon emissions.</p>	<p>The level of carbon emissions from key sectors and per capita continues a downward trend reported since 2005. Over the coming year, Ipswich Borough Council's principal air quality priority is to continue to work towards implementing the measures in the Ipswich Borough Council Air Quality Action Plan 2019 – 2024 (updated 2021) .The Council has produced a Low Emissions Supplementary Planning Document (SPD) to support meeting this target. The Ipswich Borough Council Air Quality Action Plan 2019 – 2024 (updated 2021) found that annual mean NO₂ concentrations dropped considerably compared to previous years, although it is noted that the outbreak of COVID-19 and the Government imposed lockdowns undoubtedly had an impact on air quality in 2020. An increase in the annual mean NO₂ concentration can be seen in 2021 compared to 2020, but concentrations remained below 2019 levels.</p>
<p>At least: (a) 9,777 new dwellings shall be provided to meet the needs of Ipswich within the Ipswich Housing Market Area between 2011 and 2031 in a manner that addresses identified local housing needs and provides a decent home for everyone, with 31% at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes; and (b) approximately 12,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Policy Area between 2011 and 2031².</p>		<p>171 homes were built in the reporting period, 34 of which were affordable.</p> <p>Ipswich experienced growth of 4,000 jobs 2011-2020 (Suffolk Observatory/NOMIS and ONS) or an average of 444 jobs per year. More recently, the total number of jobs reduced 2018-2019 but stabilised at 80,000 in 2020.</p>	<p>Housing completions of 171 dwellings for the 2021-22 monitoring period were below the 2017 Local Plan requirement of 489 dwellings p.a.</p> <p>However, work was already underway on a Local Plan review to align with the standard method for assessing housing need, and address housing delivery. This Local Plan, covering the period from 2018 to 2036, was adopted in March 2022. The new Local Plan housing requirement for 2021-22 is 300 dwellings per annum. Completions recorded for 2021-22 represented 57% of the updated housing requirement.</p> <p>Housing completions for the 2021-22 monitoring period are also down on the previous year by 150 dwellings (171 dwellings compared with 321). The Housing Delivery Action Plan (2022) 'Root Cause Analysis' of housing under-delivery in Ipswich identifies six factors which are currently affecting delivery rates in Ipswich. They include the higher cost of development and lower land values on urban brownfield regeneration sites. Another factor is reliance on higher density brownfield development including flatted development, which has proved less resilient in the market following the Covid Pandemic.</p> <p>The Council is addressing delivery issues through facilitating development at Ipswich Garden Suburb; making funding bids (such as the successful Housing Infrastructure Fund bid for Ipswich Garden Suburb); joint work with Homes England to tackle delivery; and direct delivery through the Council's own home building programme.</p> <p>Ipswich had a target to deliver approximately 625 jobs per annum through the 2017 Local Plan, reduced to 528 jobs per annum through the 2022 Local Plan (reflecting a lower housing requirement). Based on the data from the Suffolk Observatory, Ipswich has delivered average jobs growth per annum of 444 jobs 2011 to 2020 (4,000 jobs in total). The average masks stronger growth 2012-2018, followed by a fall in jobs in 2019, which stabilised in 2020.</p> <p>Work to promote Ipswich jobs includes the adoption of the new Local Plan in March 2022, which allocates a range of sites for employment development, and publication of a new prospectus of investment sites in October 2022, to help attract companies to invest in Ipswich. A launch event, held at Ipswich Town Football Club (ITFC), in collaboration with Suffolk Chamber of Commerce saw over 60 businesses from around Ipswich come together to see first version of the new brochure: 'Ipswich: Looking to Do Business With You'</p>

2011 Core Strategy Objectives/Targets	On track?	Progress in 2021-2022	Commentary
The development of the Borough should be focused primarily within the central 'IP-One' area and within and adjacent to identified district centres (these areas are identified on the Key Diagram in the Core Strategy).		Of the 171 new homes completed in the 2021-22 monitoring period 93% were constructed on previously developed land; 57% were completed within the IP-One area; and 93.6% (160 dwellings) were built within 800 metres of a District Centre and/or the Central Shopping Area.	The Council is meeting its targets in terms of the percentage of new homes delivered on previously developed land and the percentage of homes built within 800 metres of a District Centre and the Central Shopping Area. The Council has not met its target for the percentage of homes delivered within the IP-One area. The spatial strategy for the 2022 Local Plan continues to focus development on central Ipswich and the Council has strengthening the status afforded to the IP-One Area Action Plan. It is hoped that this, alongside other measures being taken forward by the Council, will help in meeting the target for the percentage of houses delivered in the IP-One Area.
<p>Opportunities shall be provided to improve strategic facilities in Ipswich by:</p> <p>Significantly enhancing the town centre in terms of quantity and quality of the shops, the cultural offer and the network of public spaces;</p> <p>Extending the strategic greenspace, ecological network and canopy cover; and</p> <p>Continuing to support the development of the University of Suffolk and Suffolk New College.</p>		<p>The Council carried out survey work to determine occupancy rates and mix of uses within the Town Centre in June 2022 (at the end of the monitoring period). However, as the Council was unable to carry out any onsite monitoring work during March 2020 and March 2021 due to the Coronavirus pandemic, the data is missing from these two monitoring years. The Council reported on footfall data for the Town Centre for the 2019/20 monitoring period, and this has also been updated with the figures from the 2021/22 monitoring period. The available evidence suggests that in 2021/22 Ipswich Town Centre was performing marginally better than in the 2019/20 monitoring year, with a 0.1% increase in total occupancy. The Secondary and Specialist Shopping Areas performed much better, with occupancy levels notably improved (10% and 11% vacancy respectively) compared to rates in 2019. The Primary Shopping Area saw higher levels of vacancies (at 21%). However, much of this is due to wider national retail multiple structural changes.</p> <p>Work is ongoing to secure the delivery of the new country park at Ipswich Garden Suburb through negotiations on the Henley Gate application. In February 2018 the Council was allocated nearly £10 million in government funding to support the delivery of the country park. Land has been allocated for development at Humber Doucy Lane through the new Local Plan and it will include links to the Green Trail.</p>	<p>The Retail Survey work in the Central Shopping Area was complicated by the move to retail use Class E in September 2020, making comparative use class assessment challenging. The overall average figure for Class E across the 3 shopping zones was 85.7% of the frontage calculation, with SG uses at an average of 12.1%</p> <p>The green rim is being implemented as opportunities arise, e.g. through the country park at the Ipswich Garden Suburb.</p>
To improve accessibility to and the convenience of all forms of transport, and achieve significant modal shift from the car to more sustainable modes through the Travel Ipswich and other local initiatives. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; and (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative 'green' non-vehicular access around the town and urban greening of existing routes.		The 2021 Travel to Work Survey results showed that, of the baseline employees (those who have taken part in the survey since it was first run in 2005), on average 54.4% of employees travelled to work by car (either as a single occupant or car share). 2021 data shows that the number of people working from home this year is still high, but less than it was reported in 2020.	Although the 2021 Travel to Work results show that driving remains the most frequently used mode of travel, more people are working from home this year compared to any other year of the survey, a direct result of the Coronavirus pandemic. The County Council's Local Transport Plan and the Ipswich Borough Local Plan include consideration of sustainable travel. Three sites in Ipswich have achieved a nationally recognised Modeshift STARS Accreditation for their Travel Plan implementation.
Enhanced flood protection including a tidal surge barrier should be in place to protect the town's existing and expanding communities from the threat of tidal flooding.		The tidal surge barrier was completed in February 2019.	The tidal surge barrier was completed in February 2019.
To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and conserve and enhance the historic environment and landscape character of Ipswich, including historic buildings, archaeology and townscape.		<p>The tree canopy cover target has increased from 15% canopy cover in the Borough by 2021 to 22% by 2050. In 2019 the Council achieved 15.5% tree canopy cover,</p> <p>In 2020/21, 5 buildings were considered to be at risk, 1-5 College Street, 4 College Street, St Michael's Church, County Hall, and the Tolly Brewery.</p> <p>There is 1 building on the Historic England, Heritage at Risk Register 2019, the Unitarian Chapel, Friars Street.</p>	<p>Ipswich Borough Council has signed up to the Charter for Trees in conjunction with the Woodland Trust. The Charter's ambition is to place trees and woods at the centre of national decision making.</p> <p>There has been no net increase in the number of buildings considered to be at risk in the monitoring period and dedicated work is being undertaken with the owners of each building. No. 4 College Street is IBC owned and a comprehensive conservation and renewal plan is being prepared.</p> <p>Formal urgent works engagement has been undertaken with the owners of County Hall and Cliff Brewery.</p>
To retain and provide high quality schools, health facilities, sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth and ageing population.		Pupil averages in both nursery and primary schools along with secondary schools are lower than they were in 2020.	Pupil averages are higher than the comparative national data.
To tackle deprivation and inequalities across the town.		Ipswich currently ranks ranked 71 out of 317 local authorities on the Index of Multiple Deprivation (within the 22% most deprived local authorities). The 2019 ranking is the latest available data. Comparatively, Suffolk is the 53rd least deprived upper tier authority out of 151. The Indices of Deprivation 2019 Summary, published by Suffolk County Council, indicates that Ipswich is the most relatively deprived Authority within Suffolk.	<p>This means that Ipswich became relatively more deprived in 2019 compared to 2015 and 2010. The 2019 Indices of Multiple Deprivation Data are the latest available statistics.</p> <p>A report published by the Child Poverty Action Group and the Church of England in September 2020, titled Poverty in the Pandemic: The Impact of Coronavirus on Low-income Families and Children, suggests that around 8 in 10 respondents reported a significant deterioration in their living standards due to a combination of falling income and</p>

2011 Core Strategy Objectives/Targets	On track?	Progress in 2021-2022	Commentary
			rising expenditure. Therefore, it may be that in some cases, families in Ipswich are more negatively affected by the COVID-19 pandemic than those in neighbouring authorities.
To improve air quality and create a safer, greener, more cohesive town.		<p>The recorded crime figures for 2021/22 were: Violence with Injury – 1537 Sexual offences – 690 Burglary – 386 (domestic burglary data no longer recorded) Robbery – 129</p> <p>The national air quality objective for mean annual NO₂ concentrations was exceeded at none of Ipswich Borough Council's 88 monitoring locations. However, three sites recorded concentrations within 10% of the annual mean NO₂ objective level.</p>	The Council is continuing to work with local police and community partners to ensure that appropriate opportunities to design out crime have been taken prior to the commencement of any project and as part of the on-going management of any open spaces, sport or recreational facilities.
To work with other local authorities in the Ipswich Strategic Planning Area and with community partners to ensure a co-ordinated approach to planning and development.		Ipswich has worked in partnership with neighbouring authorities within the Ipswich Strategic Housing Market Area to progress the production of documents such as the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and Local Transport Modelling.	<p>Ipswich continues to work with its partners. The Ipswich Strategic Planning Area (ISPA) Statement of Common Ground has been updated to respond to the progression of the Local Plans (see Version 7 March 2021), the production and updating of evidence and changes in national policy and guidance.</p> <p>The Ipswich Statement of Compliance with the Duty to Co-operate (June 2020) demonstrates how Ipswich Borough Council has working proactively with external organisations including neighbouring authorities and public bodies. The Statement of Compliance with the Duty to Cooperate is available to view here.</p>

CHAPTER 5:

DUTY TO CO-OPERATE

5.1 The National Planning Policy Framework (NPPF) published in July 2021, provides guidance on planning strategically across local boundaries (paragraphs 24-27). In particular, paragraph 24 of the NPPF is of particular importance, advising that local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. The strategic priorities of relevance for Ipswich, as identified through the Duty to Co-operate Statement June 2022, were:

- Housing growth and distribution;
- Gypsy and Traveller accommodation;
- Employment needs;
- Transport infrastructure and connectivity;
- Flood risk and water infrastructure;
- Protection of heritage assets; and
- Protection and enhancement of the natural environment.

The Duty to Co-operate Statement was updated in June 2022 in connection with the Ipswich Local Plan Review 2018-2036. The 2020 Duty to Co-operate Statement can be viewed on the Council's website

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a13_-_statement_of_compliance_with_the_duty_to_co-operate_june_2020.pdf

5.3 The Council continues to engage with neighbouring authorities and Suffolk County Council on strategic planning matters on a regular basis and through the Ipswich Strategic Planning Area (ISPA) Board and through working on a number of joint projects such as the Habitats Regulation Assessment Recreational disturbance Avoidance and Mitigation Strategy and updating the evidence base for the joint/aligned Local Plans. The ISPA Board action notes can be viewed at <https://www.ipswich.gov.uk/content/ipswich-strategic-planning-area>.

5.4 A Memorandum of Understanding relating to planning for housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area was signed in June 2016. The Memorandum of Understanding can be viewed on the Council's website <https://www.ipswich.gov.uk/content/ipswich-strategic-planning-area>.

5.5 More recently, the Council has been working with ISPA partners on a Statement of Common Ground relating to strategic, cross-boundary matters, to support the authorities' Local Plan reviews. It is intended that the Statement of Common Ground will be signed prior to the submission of each Local Plan for Examination, under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. The latest version was signed in advance of the submission of the Babergh and Mid Suffolk Local Plan for Examination in March 2021. The Statement of Common Ground can be viewed at <https://www.ipswich.gov.uk/content/ipswich-strategic-planning-area>.

5.6 Aside from the ISPA Board, other outcomes related to the Duty to Co-operate for the period April 2021 – March 2022 include:

- Working with Natural England, Babergh, Mid Suffolk, Suffolk Coastal and Waveney District Councils (now East Suffolk) on the production of a Habitats Regulations

Assessment Recreational disturbance Avoidance and Mitigation Strategy (Suffolk Coast RAMS).

- Local Transport Modelling (ongoing) (undertaken with Babergh, Mid Suffolk and Suffolk Coastal (now part of East Suffolk) District Councils and Suffolk County Council);
- Working with the Environment Agency and Suffolk County Council on the production of the Development and Flood Risk Supplementary Planning Document (SPD) adopted on 27 July 2022.

Joint working outcomes from the previous monitoring period (2019-20) included:

- Provision of a Cross Boundary Water Cycle Study, January 2019 (undertaken with Suffolk Coastal (now part of East Suffolk Council); and
- Air Quality Screening (undertaken with Suffolk Coastal (now part of East Suffolk), Babergh and Mid Suffolk District Councils and Suffolk County Council). The Councils are developing a proportionate approach to the transport mitigation of development on the edge of Ipswich and its likely impact on Ipswich using information from the transport and air quality modelling.

CHAPTER 6: SUSTAINABILITY APPRAISAL

- 6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 requires that:
- 17(1) 'the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action'*
- (2) 'the responsible authority's monitoring arrangements may comprise or include arrangements established otherwise that for the express purpose of complying with paragraph (1)'*
- 6.2 The purpose of the sustainability appraisal process is to appraise the social, environmental and economic effects of a plan from the outset. In doing so it will help ensure that decisions are made that contribute to achieving sustainable development.
- 6.3 A Sustainability Appraisal (SA), (incorporating the requirements for Strategic Environmental Assessment), was carried out of the Core Strategy and Policies DPD. A monitoring framework was produced as part of the SA process and this is shown in Appendix 13. The Table below shows where SA objective progress can be found in this report. The SA framework used is very similar to that used for the 2017 Ipswich Local Plan.
- 6.4 Ipswich Borough Council and East Suffolk (formerly Suffolk Coastal) jointly produced a Sustainability Appraisal Scoping Report which set out the proposed approach to undertaking the SA of the emerging Local Plan. This was included in the 2017 Issues and Options consultation. The SA work has since been progressed by the Council's consultants.

Table 6: Sustainability Appraisal Objectives

Sustainability Appraisal Objective	Local Plan Objective
ET1. To improve water and air quality	2,6
ET2. To conserve soil resources and quality	3
ET3. To reduce waste	1
ET4. To reduce the effects of traffic on the environment	6
ET5. To improve access to key services for all sectors of the population	4
ET6. To reduce contributions to climate change	1
ET7. To reduce vulnerability to climatic events and increasing sea levels	7
ET8. To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	8
ET9. To conserve and, where appropriate, enhance areas of historical importance	8
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	8
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	8
HW1. To improve the health of those in most need	3,6
HW2. To improve the quality of life where people live and encourage community participation	5
ER1. To reduce poverty and social exclusion	10
ER2. To offer everybody the opportunity for rewarding and satisfying employment	10
ER3. To help meet the housing requirements for the whole community	3
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	3
ER5. To revitalise town centre	3
ER6. To encourage efficient patterns of movement in support of economic growth	6
ER7. To encourage and accommodate both indigenous and inward investment	3
CL1. To maintain and improve access to education and skills in the population overall	10
CD1. To minimise potential opportunities for and anti-social activity	11

CHAPTER 7:

CONCLUSIONS

- 7.1 The monitoring period between 1st April 2021 - 31st March 2022 saw significant progress in the preparation of planning policy documents for Ipswich Borough. It is important to keep the planning policy framework for the Borough up to date, to ensure the delivery of appropriate development across the Borough.
- On 23 March 2022, the Council adopted the Ipswich Local Plan Review 2018-2036.
 - This followed its submission on 10 June 2020; Examination Hearing sessions between 23 November and 16 December 2020; and consultation on Main Modifications 29 July to 23 September 2021.
 - In July 2021, the Council adopted the Reptile Strategy Supplementary Planning Document (SPD).
 - Also in July 2021, the Council adopted the Local List (Building of Townscape Interest) Supplementary Planning Document (SPD).
 - In December 2021, the Council adopted the Low Emissions Supplementary Planning Document (SPD).
 - In December 2021, the Borough Council updated its Part One Brownfield Land Register, a register of brownfield land which is suitable for residential development.
- 7.2 The Borough worked with neighbouring planning authorities in partnership to progress the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The Council has also worked with the Environment Agency and Suffolk County Council on the production of the Development and Flood Risk Supplementary Planning Document (SPD).
- 7.3 The implementation of planning policies has been monitored against the Core Strategy and Policies Development Plan Document Review (DPD) (February 2017) in this report.
- 7.4 Housing completions in Ipswich were down slightly on the previous year during 2021-22. The completion of 171 new dwellings, 34 of which were affordable housing completions (19.9%), represented delivery below the 2017 Local Plan requirement of 489dpa and the new Local Plan stepped requirement of 300 d.p.a. No student accommodation or assisted living units were built during this period. Of the 171 dwellings, 93% were built on previously developed land and 57% were within the central IP-One area. Housing completions are expected to start to show recovery during the next monitoring year as homes start to be built at Ipswich Garden Suburb within the Henley Gate neighbourhood. The Council is also progressing its own major projects at sites including Ravenswood UVW and Bibb Way, which will deliver homes within the five year period.
- 7.5 The housing land supply in Ipswich Borough stood at 5.2 years at 1st April 2022 and is detailed in the housing trajectory at Appendix 3.
- 7.6 The Council continues to undertake its duty to co-operate with Babergh District, Mid Suffolk District and East Suffolk Councils (formerly Suffolk Coastal) and Suffolk County Council, particularly through the Ipswich Strategic Planning Area Board (ISPA). The Council also continues to have on-going dialogue with statutory agencies including Anglian Water, Historic England, the Environment Agency and Natural England through the Local Plan preparation and revision process.
- 7.7 In response to the information presented in this AMR, Ipswich Borough Council plans to:

- Use the AMR to monitor local and national performance indicators and the local plan monitoring framework;
- Seek ways in which to improve the monitoring of the implementation of the Local Plan; and
- Update timetables for the preparation of planning documents on the Council's website to ensure that the public has up to date information about the preparation of planning documents.

APPENDICES

Commentary and Data for each of the Objectives in the Adopted Core Strategy:

Appendix 1: Objective 1 – High Standards of Design

Appendix 2: Objective 2 – Carbon Emissions

Appendix 3: Objective 3 – Housing Completions and Employment Provision

Appendix 4: Objective 4 – IP–One Development

Appendix 5: Objective 5 – Strategic Facilities

Appendix 6: Objective 6 – Accessibility

Appendix 7: Objective 7 – Flood Protection

Appendix 8: Objective 8 – Protection of Open Spaces

Appendix 9: Objective 9 – Community Infrastructure

Appendix 10: Objective 10 – Deprivation

Appendix 11: Objective 11 – A Safe and Cohesive Town

Appendix 12: Objective 12 – Ipswich Policy Area

Appendix 13: Monitoring Against the Sustainability Appraisal

Appendix 1 – Objective 1: High Standards of Design

Objective:

High standards of design will be required in new development, this is supported by the NPPF. Development must also be sustainable, environmentally friendly and resilient to the effects of climate change. Standards of acceptability will be raised progressively from 2006 (Building Regulations) levels for all developments in the town in terms of design and environmental performance.

Target:

At least 75% of new dwellings gaining planning permission in any year to achieve 'Code for Sustainable Homes' levels as set out in policy DM1 of the Core Strategy and Policies DPD.

Commentary:

Policy DM1 'Sustainable Design and Construction' sets out the environmental requirements for all new residential and non-residential buildings.

The policy requires new build residential development to meet water efficiency standards of 110 litres per person per day and achieve reductions in CO2 emissions of 19% below the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations (Part L).

The environmental standard for non-residential development is BREEAM and from 2010 until the end of 2012, a 'Very Good' standard was required. From 2013, this increased to an 'Excellent' standard for development over 500 sqm. Most non-residential developments has been certified as BREEAM 'Very Good' rather than BREEAM 'Excellent'. Through the adoption of the 2017 Local Plan Review the BREEAM 'Very Good' Standard or equivalent is encouraged rather than required in accordance with the Government advice. This change was included within the Local Plan Inspector's Main Modifications because of viability considerations.

Indicators:

Indicator 1.1 – Overall / general satisfaction with the local area.
Overall / general satisfaction with local area Not currently monitored

Table 7: Completed Dwellings or Non-Residential Floor Space (CfSH or BREEAM)

Indicator 1.2 – Proportion of completed dwellings or non-residential floor space achieving CfSH or BREEAM targets (in relation to Policy DM1).
This information is no longer routinely recorded by the Council for the reasons explained above.

Indicator 1.3 – Proportion of dwellings granted planning permission that achieve Building for Life 12.
Not currently monitored, since Ipswich Borough Council does not have any Building for Life assessors.

Appendix 2 – Objective 2: Carbon Emissions

Objective:

Every development should contribute to the aim of reducing Ipswich town's carbon emissions below 2004 levels.

Target:

To reduce Ipswich's estimated carbon footprint by 60% from the 2004 base level (Cred) by 2025. This equates to a goal of per capita (t) CO₂ emissions for Ipswich of 2.28.

Commentary:

In the same way that one of the aims of the Council's Corporate Plan is to make Ipswich a greener place to live, the fundamental principle of the 2021 National Planning Policy Framework (NPPF) is to achieve Sustainable Development. Central to attaining sustainability, is the reduction of emissions of carbon dioxide (CO₂) and this lies at the heart of the vision and objectives set out in the Ipswich Local Plan.

Because sustainability is a thread that runs through so many of our policies, monitoring each policy implementation individually would be overly complicated. Central Government monitors the annual carbon emissions for the Borough as part of its own monitoring process on climate change (former National Indicator 186). This process runs behind the monitoring period for this AMR (2020-2021) however it still provides emissions data that can be monitored at a local level, with the most recent data being provided for 2020.

During the period 2005 – 2020 Ipswich CO₂ emissions reduced by 52.6% to 2.7 tonnes per capita. The Centre for Cities Report 2020 listed Ipswich as having the lowest CO₂ emissions per capita of sixty-three UK cities (based on 2017 data)³. CO₂ is not the only harmful emission, however, as levels of nitrogen dioxide (NO₂) and fine particulate matter 2.5 (PM_{2.5}) also have severe impacts on human health and the environment. The same report also list Ipswich as, in 2018, having a measured Daily Air Quality Index of equal to or over 4 (values of the 5 main air pollutants that are likely to have a health impact on vulnerable adults and children) for 33 days, ranking it 21st in the same list of cities.

Planning policy has a number of current and future initiatives to contribute to the reduction of CO₂ emissions in Ipswich, which include requiring electric charging points in major new developments and the production of the Cycling Strategy SPD in 2016 and Low Emissions SPD adopted in December 2021.

The Low Emissions SPD provides guidance to applicants as to how the Council expects air quality to be addressed through planning applications for sites within Ipswich Borough and will ensure that the approach to car parking provision within developments in central Ipswich supports sustainable travel choices, to help manage congestion and associated emissions.. Planning Policy will from next reporting year be able to monitor and report on the number of applications that have submitted Exposure Assessments, Air Quality Assessments and Scheme Mitigation Statements for proposed developments on an annual basis. Once a full set of annual data is available, this will be included in Appendix 2.

³ <https://www.centreforcities.org/wp-content/uploads/2020/01/Cities-Outlook-2020.pdf>

The level of reduction of CO₂ emissions recorded up to 2017, if projected forward to 2025, indicates that the Local Plan target for 2.28 per capita (t) CO₂ emissions (a 60% reduction from 2004 levels) will be met.

Whilst the overall trend for centrally monitored CO₂ levels shows a reduction, air quality in central areas of Ipswich, and indeed in other towns and cities in the UK and beyond remains an issue. The Government's revised Air Quality Strategy for England, Scotland, Wales and Northern Ireland was a direct response to the requirements of the Environment Act 1995 and it set health based standards and objectives covering seven pollutants:

- Benzene;
- 1,3-Butadiene;
- Carbon Monoxide;
- Lead;
- Nitrogen Dioxide (NO₂);
- Particulate Matter (PM₁₀); and
- Sulphur Dioxide.

The Act requires all local authorities to periodically review and assess air quality in order to determine whether the Air Quality Objectives will be met.

Four Air Quality Management Areas (AQMA) have been designated in Ipswich due to annual average concentrations of nitrogen dioxide (NO₂) exceeding national objective levels. Ipswich Borough Council monitors the air quality in Ipswich using automatic monitors and numerous diffusion tubes across the town. Following the amendment of AQMA Nos. 1 to 3 and the revocation of AQMA No. 4 (Incorporating the Bramford Road / Yarmouth Road / Chevallier Street junction and part of Chevallier Street (declared 2010)) in August 2021, Ipswich Borough Council worked closely with the local Highway Authority, Suffolk County Council and other stakeholders, including Public Health, to update the 2019 – 2024 Air Quality Action Plan (AQAP). The updated AQAP was published in October 2021.

When comparing the 2021 results to the 2020 results generated using the locally derived bias adjustment factor, in 2020 there were no exceedances and in 2021 there were three recorded exceedances (one exceedance within AQMA 2 and two exceedances within AQMA 5). In 2021, six sites recorded concentrations within 10% below the annual mean NO₂ objective level.

When looking at the bias and distance corrected data for 2020, annual mean NO₂ concentrations dropped considerably compared to previous years. The outbreak of COVID-19 and the Government imposed lockdowns undoubtedly had an impact on air quality in 2020. The reasons for this were over and above the influence of Covid-19.

An increase in the annual mean NO₂ concentration can be seen in 2021 compared to 2020, but concentrations remained below 2019 levels. It is likely that the increase in concentrations in 2021 compared to 2020 was linked to the relaxation of Government travel restrictions associated with the COVID-19 pandemic.

Once bias adjusted using the local factor and distance corrected, the nitrogen dioxide diffusion tube data for 2021 shows that the national air quality objective for mean annual NO₂ concentrations were exceeded at three of Ipswich Borough Councils monitoring locations. These sites were located within AQMA 2 and 5. No exceedances were noted in AQMA 1 and 3 following bias adjustment and distance correction.

Table 8: CO2 Emission Estimates and Population Figures (latest available data)⁴

Indicators:

Indicator 2.1 – CO2 emission estimates and population figures 2005-2020 (Emissions per capita (t) CO2 , and population based on mid year estimates)						
	Ipswich CO2 (t)	Ipswich Population	Suffolk CO2 (t)	Suffolk Population	National CO2 (t)	National Population
2005	5.7	124,000	8.0	697800	7.5	60,413,300
2006	5.6	124,800	8.0	703000	7.4	60,827,100
2007	5.4	125,500	7.5	709100	7.2	61,319,100
2008	5.2	127,400	7.3	714300	7.0	61,823,800
2009	4.6	129,300	7.0	718200	6.4	62,260,500
2010	4.7	131,700	7.4	724000	6.6	62,759,500
2011	4.1	133,700	6.6	730100	6.0	63,285,100
2012	4.3	135,100	6.9	732800	6.2	63,705,000
2013	4.2	135,600	6.8	735800	6.0	64,105,700
2014	3.6	136,000	6.2	742500	5.4	64,596,800
2015	3.4	137,700	5.9	747700	5.1	65,110,000
2016	3.1	138,500	5.6	751200	4.8	65,648,100
2017	3.0	138,500	5.3	757000	4.6	66,040,200
2018	3.0	137,500	5.4	758600	4.5	66,435,600
2019	2.8	136,900	4.9	761,400	4.3	66, 796,800
2020	2.7	136,000	4.4	761,200	3.8	67,081,200
% change since 2005:	-52.6%	+8.8%	-45%	+8.3%	-49.3%	+10.0%

⁴ [UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Table 9: Ipswich Carbon Emissions (2005-2020) (latest available data)⁵

<i>Indicator 2.2 - Ipswich Carbon Emissions from 2005 – 2020 (Emissions per capita (t) CO2)</i>					
Year	Industry Total	Commercial Total	Domestic Total	Transport Total	Public Sector
2005	94.9	164.2	284.8	149.0	64.6
2006	98.2	160.1	285.4	146.6	61.1
2007	88.6	149.0	278.7	147.3	57.3
2008	81.1	144.8	276.2	142.3	55.7
2009	73.3	124.5	250.2	137.7	48.6
2010	75.6	128.6	269.4	136.8	51.1
2011	65.7	108.1	237.0	133.8	43.0
2012	68.3	116.0	254.0	130.8	45.7
2013	67.7	111.6	244.9	127.7	46.7
2014	57.1	91.2	207.3	128.1	38.1
2015	54.1	79.9	201.5	132.7	33.7
2016	46.6	59.8	190.0	134.0	33.8
2017	43.5	53.1	176.9	138.5	32.2
2018	43.2	49.3	171.6	130.6	31.0
2019	39.5	41.4	163.1	124.5	27.5
2020	36.5	32.4	162.7	100.5	24.5
% change since 2005:	-61.5%	-80.3%	-42.9%	-32.6%	-62.1%

⁵ [UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Appendix 3 – Objective 3:

Housing Completions and Employment Provision

Objective:

At least: (a) 9,777 new dwellings shall be provided to meet the needs of Ipswich within the Ipswich Housing Market Area between 2011 and 2031 in a manner that addresses identified local housing needs and provides a decent home for everyone, with 31% at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes; and (b) approximately 12,500 additional jobs being provided in Ipswich to support growth in the Ipswich Policy Area between 2011 and 2031.

Target:

To deliver at least (a) 9,777 homes by 2031 and approximately (b) 12,500 jobs by 2031

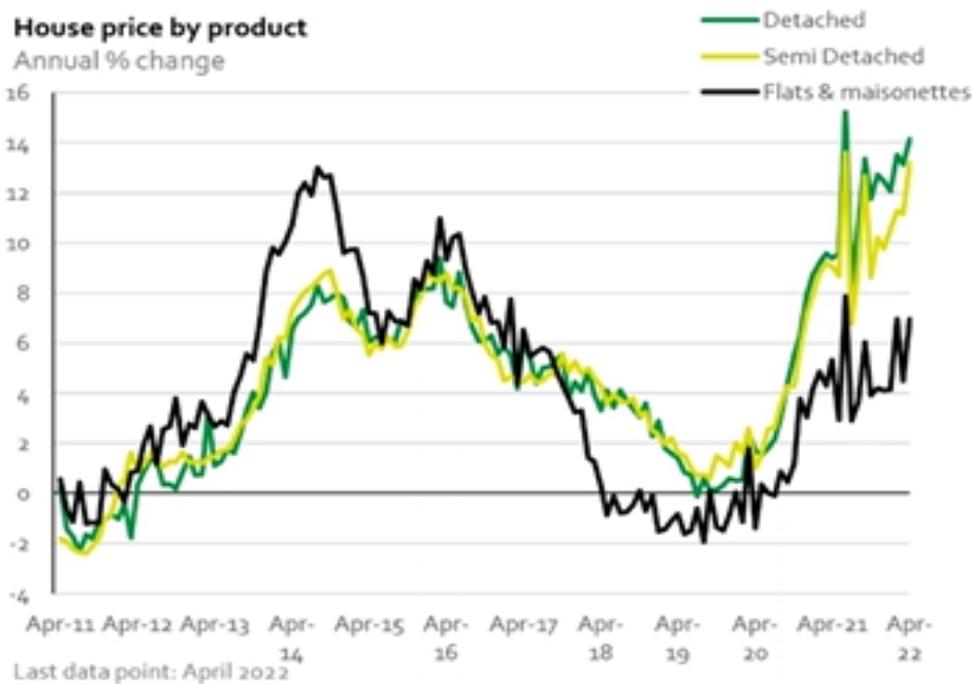
Commentary:

Under the superseded Ipswich Local Plan 2011-2031 adopted in February 2017, the Council approved a requirement of 489 dwellings per annum and 12,500 jobs. For delivery and monitoring purposes the target was backdated to 2011. This was the Local Plan in position for all except a week of the monitoring period April 2021-March 2022. However, because the new Local Plan adopted on 23 March 2022 uses a 2018 baseline for the housing requirement, the completions and the forward looking housing land supply section of this appendix will relate to the most up to date housing requirement from the new Local Plan.

Housing completions 2021-22 total 171 dwellings. This exceeds the forecast of 166 completions made through the previous housing trajectory (Authority Monitoring Report 2020/21). However, housing completions for the 2021-22 monitoring period (171 homes) are down on the previous period (321 homes). This contrasts with the national picture for the year to the end of March 2022 which saw net new homes delivered in England increase by 10% over the previous year, according to data published by the Department for Levelling Up, Housing and Communities.

There are several reasons which may explain why completions in Ipswich have lagged behind expectations. The development sector may have been waiting for the completion of the Local Plan process and the certainty provided by the new Ipswich Local Plan's adoption in March 2022.

The Local Plan strategy retains a regeneration focus on brownfield land and higher density development, complemented by lower density greenfield development at Ipswich Garden Suburb. The higher density development includes flats, which have proved less resilient in the market following the Covid Pandemic. The graph below (source ONS and analysis by Homes England) indicates how the price differential between flats and houses has widened since 2019. Flats remain a significant component of expected completions in Ipswich until delivery of houses at Ipswich Garden Suburb becomes the significant element of the supply from 2024. Given the value gap shown in the graph, the market for flatted development may be acting as a constraint on delivery.



Source: ONS, Homes England analysis

The Housing Delivery Action Plan published in 2022 included 'Root Cause Analysis' of housing under-delivery in Ipswich and identified six factors which are currently combining to affect delivery rates:

- The tight, compact urban nature of the Borough (which constrains the range of housing sites available);
- The higher cost of development and lower land values;
- Low private sector delivery levels of affordable housing;
- The inability of the local planning authority to incentivise delivery of housing, or sanction non-delivery;
- Reliance on higher density brownfield sites, including flatted development which has proved less resilient in the market following the Covid Pandemic; and
- The presence of greenfield sites, which offer fewer constraints, outside the Borough boundary (for example, completions in the 'Ipswich fringe' within Babergh District have increased from 0 in 2017-18 to 94 in 2021-22).

Macro-economic factors may also be at play, such as rising interest rates, global commodity prices, trade frictions and the effects of war and sanctions. However, nationally, completions rose over the monitoring period.

The Council is working hard to support house building across the Borough and the adoption in March 2022 of the Ipswich Local Plan 2018-2036 will offer greater certainty to the development sector. The Council is continuing to progress work on Ipswich Garden Suburb, which will provide up to 3,500 new homes and associated infrastructure. The Council was successful in its bid to Homes England for £9.8m of Housing Infrastructure Funding (HIF) through the Marginal Viability Funding route and is working with Homes England to address barriers to the delivery of key brownfield regeneration sites.

Ipswich Borough Council continues to progress a programme of affordable house building across 20 plus sites in the Borough and has an aspiration to develop 1,000 new affordable homes within a decade. During this monitoring period, the Council actively pursued its own development sites.

Completions were delivered on former garage court sites at Mallard Way and Sheldrake Drive (6 and 8 dwellings respectively), Whitton Church Lane (8 dwellings), Emmanuel Close (6 dwellings), Coltsfoot Road (3 dwellings) and Halton Crescent (1 dwelling). Construction work was underway on 16 flats at 28-50 Grimwade Street (site reference IP386); Ravenswood UVW (reference IP150a) was at post-planning stage; and the site of the former BT office at Bibb Way (reference IP279) was in the development management process.

No student accommodation or assisted living units were built in Ipswich during the monitoring period. Of the homes completed in Ipswich, 93% were constructed on previously developed land and 57% were within the IP-One area and 58% were flats. The level of affordable homes provided amounted to 19.9% which is above the 15% target established within the Core Strategy 2011-2031. The level of windfall development on sites not previously identified by the Council was 93 dwellings, of which 22 resulted from permitted development applications.

Housing completions for 2021-22 were below the requirement set out through the 2017 Local Plan. The new Local Plan was adopted in March 2022 with a baseline of 2018. Under the stepped housing requirement of the 2022 Local Plan for 300 dwellings per annum, 171 completions 2020-21 represents a cumulative deficit of 64 dwellings (a change from a surplus in 2021).

Table 10: Net Housing Completions and Affordable Housing

Indicators:

Indicators 3.1, 3.3 & 3.4 - Net housing completions, affordable housing, and those within IP-One							
	New Homes	Previously Developed Land		Affordable Homes		Within IP-One area	
			%		%		%
2001 – 2002	347	267	77	31	9	45	13
2002 – 2003	468	402	86	157	34	10	2
2003 – 2004	566	469	83	107	19	172	30
2004 – 2005	717	677	94	102	14	428	60
2005 – 2006	782	759	97	156	20	308	39
2006 – 2007	985	972	99	163	17	321	33
2007 – 2008	1,413	1,413	100	329	23	779	55
2008 – 2009	899	884	98	245	27	501	56
2009 – 2010	389	377	97	26	7	232	60
2010 – 2011	337	303	90	135	40	109	32
2011 – 2012	283	202	71	152	54	51	18
2012 – 2013	100	63	63	7	7	13	13
2013 – 2014	228	190	83.3	44	19.3	117	51.3
2014 – 2015	470	418	88.9	202	43.0	318	67.7
2015 – 2016	496	355	71.6	133	26.8	237	47.8
2016 – 2017	256	211	82.4	4	1.6	109	42.6
2017 – 2018	141	133	94.3	20	14.2	71	50.5
2018 – 2019	223	171	76.7	9	4.0	77	35
2019 – 2020	421	356	84.6	35	8.3	229	54.4
2020 – 2021	321	286	89.1	47	14.6	102	31.8
2021 – 2022	171	159	93.0	34	19.9	98	57.3
including Assisted Living units							

Table 11: Net Housing Totals Since 2001

Fig 3a – Net housing totals since 2001 (including assisted living units)							
	New Homes	Previously Developed Land		Affordable Homes		Within IP-One area	
Apr 2018 – Mar 2021	965	813	84%	91	9%	408	42%
Apr 2021 – Mar 2022	171	159	93.0%	34	19.9%	98	57.3%
Total Apr 2018 – Mar 2022	1,136	972	85.6%	125	11%	506	44.5%
Apr 2011 – Mar 2018	1,974	1,572	80%	562	28%	916	46%
Apr 2001 – Mar 2011	6,903	6,523	94%	1,451	21%	2,905	42%
Total Apr 2001 – Mar 2022	10,013	9,067	90.6%	2,138	21.4%	4,327	43.2%

Table 12: Housing Target Evolution

Fig 3b – Housing target evolution				
Document	Adoption Date	Housing Period	Total Ipswich Housing Target	Annual Target
Suffolk Structure Plan	1995	1988-2006	4,490	250
Ipswich Local Plan	1997	1988-2006	4,490	250
Suffolk Structure Plan	2001	1996-2016 (mid year based)	8,000	400
First Deposit Draft Ipswich Local Plan (not adopted)	2001	1996-2016 (mid year based)	8,000	400
Regional Spatial Strategy	2008	2001-2021 (financial year based)	15,400	770
Ipswich Local Plan (formerly LDF) Core Strategy	2011	2001-2030 (financial year based)	18,900	700
Ipswich Local Plan 2011-2031	2017	2011-2031	9,777	489
Ipswich Local Plan 2018-2036	2022	2018-2036	8280	Average 460 dpa stepped to 300dpa x 6yrs and 540dpa x 12yrs

13: 5 Year Housing Land Requirement at 1st April 2022

Fig 3c – 5 year housing land requirement	
Housing requirements	No. of units
Local Plan Housing Requirement at based on stepped trajectory 2 years x 300 dwellings per annum (600) + 3 years x 540 dpa (1620)	2,220
Residual requirement from 1 st April 2018 to 31 st March 2022 (1200 dwellings required minus 1136 dwellings completed = a deficit of 64	64
Add a 20% buffer as required by the Housing Delivery Test	456.8
Ipswich five year housing requirement	2,740.8

Table 14: Ipswich Housing Land Supply 2022 - 2027

Fig 3d. Ipswich Housing Land Supply 2022 – 2027	
Type of site	No. of Units
Extant Planning Permissions on Allocated Sites (including 710 at IGS)	941
Extant Planning Permissions on Unallocated Large Sites	819
Extant Planning Permissions on Unallocated Small Sites	206
Sites where principle of development accepted (planning permissions subject to S106, Local Plan sites and lapsed planning permissions supported by the Strategic Housing & Economic Land Availability Assessment (SHELAA))	534
Ipswich Garden Suburb	249
A justified windfall element (linked to SHLAA evidence of genuine local circumstances)	100
Ipswich Housing Supply Total	2,849

Table 15: Ipswich Housing Land Supply Calculation at 1st April 2022

Figure 3e: Ipswich Housing Land Supply Calculation – April 2022		
Requirement April 2018 – March 2021 (A) (based on stepped trajectory - 4 x 300 dwellings per year)	300 x 4	1,200
Completions April 2018 – March 2022 (B) ^[1]		1,136
Shortfall/Surplus April 2018 – March 2021 (to be added to 5 year supply) (C)	1,200-1,136	64
Local Plan requirement April 2022 – March 2027 (based on stepped trajectory - 2 years at 300dpa (600) plus 3 years at 540dpa (1,620) (D)	(600 + 1,620)	2,220
Five year requirement (E) (requirement April 2022– March 2027 (D) plus shortfall for next 5 years (C)	-2,220 + 64	2,284
Add 20% buffer ^[3] (F) (five year requirement (E) x 1.2)	2,284 x 1.2	2,741
Annual requirement April 2022 – March 2027 (G) (five year requirement (F) / 5 years)	2,741 / 5	548.2
Identified supply April 2022 – March 2027 (H)	see housing trajectory (Table 18)	2,849
Housing supply in years (I) (Identified supply (H) / Annual requirement April 2022 – March 2027 (G))	2,849 / 548.2	5.2

Table 16: Net Annual Housing and Employment Land Completions

Indicator 5 - Net annual housing and employment land completions	
	Land amount in hectares
Housing completions	2.92
Employment completions	1.63
Total	4.55

* Floorspace completed

[1] Completions include assisted living units as per the guidance in national Planning Practice Guidance which states 'Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.' (Reference ID: 3-037-20150320). In accordance with The Planning Practice Guidance (Paragraph 68-035-20190722) Care Homes are included in the housing land supply based on the amount of accommodation released in the housing market. The Council has applied a ratio of 1 dwelling for every 1.8 care home bedrooms.

[3] The buffer is added to the requirement without the shortfall to avoid a 'double counting' the undersupply.

Table 17: Target (To Deliver)

Target – To deliver a) 8,280 homes by 2036 and b) 9,500 jobs by 2036 (2022 Local Plan)	
	% complete
a) Homes 8,280 dwellings by 2036	13.72%
b) Employment 9,500 jobs by 2036 (latest jobs data for 2020 indicates a reduction of 3,000 jobs from the plan's 2018 baseline, but no change in the number of jobs 2019-2020)	0%

Target – To deliver a) 9,777 homes by 2031 and b) 12,500 jobs by 2031 (2017 Local Plan)	
	% complete
a) Homes 9,777 dwellings by 2031	31.8%
b) Employment 12,500 jobs by 2031 (latest jobs data for 2020 indicates a gain of 4,000 jobs 2011-2020, representing 32% of the target, but no change in the number of jobs 2019-2020)	32%

N.B. The 2017 Local Plan targets have been superseded by the new requirements identified through the 2022 Local Plan.

To quantify the number of jobs created annually, the Council was previously using the East of England Forecasting Model. However, the Model's owner, the East of England Local Government Association, decided to discontinue updating the East of England Forecasting Model (EEFM) after 2019. Therefore, change in the number of jobs in Ipswich reported above has been monitored against data from the Suffolk Observatory, which is sourced from NOMIS/ONS. Change in the number of jobs in Ipswich shows sustained growth 2012-2018 followed by a sharp drop in 2019.

The reduction in 2019 is also reflected in the figures for East Suffolk and Babergh. This suggests it is a result of more than local factors. It appears to be temporary, as after 2019, the figure for Ipswich stabilises at 80,000 jobs in 2020. Work to promote Ipswich jobs includes the adoption of the new Local Plan in March 2022, which allocates a range of sites for employment development, and publication of a new prospectus of investment sites in October 2022, to help attract companies to invest in Ipswich. A launch event, held at Ipswich Town Football Club (ITFC) in collaboration with Suffolk Chamber of Commerce, saw over 60 businesses from around Ipswich come together to see first version of the new brochure: 'Ipswich: Looking to Do Business With You'.

The Housing Delivery Test is an annual measurement of housing delivery in the area of relevant plan-making authorities. In January 2022, the government published the latest Housing Delivery Test results. They show that Ipswich achieved 82% of its required housing delivery over the previous three years. Therefore, the Borough is required to add a 20% buffer to the five year housing land supply (see Table 15). In response to under delivery in Ipswich, the Council has published a Housing Delivery Action Plan which explores the key reasons for under delivery and identifies mechanisms to improve delivery. The [Housing Delivery Action Plan 2022](#) is available via the Council's website.

Self-build and Custom Housebuilding

Demand

The Right to Build legislation requires councils to ensure that they have met the demand for Self-build and Custom Build plots in their area and this requires robust and ongoing monitoring of the plot delivery.

The Ipswich Self-Build and Custom Build Register has been running since May 2015. Demand is measured in 'base periods' that run from the start of the register until 30th October 2016 and then annually from 31st October until 30th October the following year.

The number of people on the register for the first base period in Ipswich is 22. The number of people on the register during the second base period is 30. The number of people on the register during the third base period is 18. The number of people on the register during the fourth base period is 13. The number of people on the register during the fifth base period is 14. The number of people on the register for the sixth base period is 33. The number of people on the register for the seventh base period is 20.

Demand for self-build and custom build plots dipped during the 2021/2022 base period. This drop in demand could be a consequence of the rising cost of living, higher mortgage rates and the increasing cost of construction materials. The Royal Institute of Chartered Surveyors (RICS) are reporting delays and increased prices of materials and labour across the economy. These factors maybe causing many people to reassess their housing needs.

To date, the Borough has received no applications from associations of individuals interested in a single site large enough to accommodate multiple self-build or custom build dwellings.

Supply

Between 31st October 2021 and 30th October 2022, the Council did not grant sufficient suitable permissions for serviced plots to meet the demand identified through the register. The Council granted permission for five serviced plots which met the definition of self-build / custom build. This was against demand for 13 serviced plots, a shortfall of 77%. The Council is taking steps to address the issue of under delivery of self-build and custom build development.

The Council's [Self-build and Custom Build Register Report 2021/22](#) provides more information on the demand and supply of self-build and custom housebuilding as revealed by the Ipswich register.

Table 18: Ready to Develop Housing Sites (Housing Trajectory) (based on adopted Local Plan sites at 1st April 2022)

Indicator 3.2 - Supply of ready to develop housing sites - 5 year supply																									
Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)
IP003		Allocation (SP37^)	3-11 and 4-32 Portman's Walk IP1 2DW (north of Sir Alf Ramsey Way)	B	1.41	0	114	114	0									25	30	34	25				114
IP004	UC004	Allocation (SP38^)	Bus depot, 7 Constantine Road IP1 2DP	B	1.07	0	48	48	0											24	24				48
IP009	UC009	Allocation (SP2)	Victoria Nurseries, 1 Kettlebaston Way IP4 2XX	B	0.39	0	12	12	12					12											12
IP010	UC010a & b	Allocation (SP10#)	Felixstowe Road	B	5	0	137	137	0						25	50	19	19	24						137
IP011a	UC011 part	Allocation (SP26)	Former Gym and Trim Health Club, Lower Orwell Street IP4 1BU	B	0.16	0	18	18	18					18											18
IP011b	UC011 part	Allocation (SP26)	Eastern Counties Bus Depot, Foundation Street IP4 1BQ and 6 Smart Street IP4 1BP	B	0.62	0	56	56	0										28	28					56
IP011c	UC011 part	Allocation (SP26)	Car Park, Smart Street	B	0.08	0	7	7	0							7									7
IP012	UC012	Allocation (SP26)	52 to 60 Grimwade Street IP4 1LP & Portia House Star Lane IP4 1JN (Peter's Ice Cream)	B	0.32	0	35	35	0						35										35
IP014		Allocation (SP26)	92 - 94 and Hope Church, 114 Fore Hamlet IP3 8AF	B	0.21	0	30	30	30			30													30
IP015	UC015	Allocation (SP39^)	Car Park, West End Road	B	1.22	0	67	67	0							25	30	12							67
IP031a	UC032	Allocation (SP26)	Car Park, Burrell Road	B	0.44	0	20	20	0							20									20
IP031b	19/00369 22/00324	Full S106 and Full approved (SP27)	22 Stoke Street IP2 8BX	B	0.18	0	32	32	32		3		29												32

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)	
IP032	UC033	Allocation (SP12#)	King George V Field, Old Norwich Rd	G	3.7	0	99	99	0									33	33	33						99
IP033	UC034	Allocation (SP13#)	Land at Bramford Road (Stocks site)	G	2.03	0	55	55	0						27	28										55
IP035		Allocation (SP40^)	Key Street/Star Lane (St Peter's Port)	B	0.54	0	86	86	0						40	46										86
IP037	UC038	Allocation (SP35^)	Island site	B	6.02	0	421	421	0									55	70	75	75	76	70			421
IP039a	UC040	Allocation (SP26)	Land between Gower Street and Great Whip Street	B	0.48	0	45	45	0													22	23			45
IP040		Allocation (SP41^)	Civic Centre area, Civic Drive	B	0.73	0	59	59	0								25	34								59
IP041		Allocation (SP26)	Former Police Station, Civic Drive	B	0.52	0	58	58	20					20	38											58
IP042	12/00700	Allocation (SP42^)	Land between Cliff Quay and Landseer Road	B	2.06	0	222	222	0							74	74	74								222
IP043	UC044	Allocation (SP43^)	47 Key Street and Slade Street Car Park, Star Lane	B	0.7	0	50	50	0						25	25										50
IP047	19/00148	Outline (S106) (SP27)	Land at Commercial Road	B	3.11	0	173	173	173		44	44	44	41												173
IP048a	UC051	Allocation (SP36^)	Mint Quarter East. (Area remaining following approval of 21/00541/FUL, please see site IP398 below).	B	0.89	0	50	50	0							25	25									50
IP398 (was part of IP048a)	21/00541	Full - approved (SP27)	34 - 54 Upper Orwell Street	B	0.05	0	9	9	9			9														9
IP048b		Allocation (SP36^)	Mint Quarter West	B	1.34	0	36	36	0								36									36
IP048c	18/00740 20/00515	Prior Approval - approved (SP27)	6-10 Cox Lane and 36-46 Carr Street (upper floors)	B	0.23	34	2	36	2	2																2
IP054a	16/01037 (and 21/00959)	Full - approved (SP27)	30 Lower Brook Street	B	0.56	0	61	61	61		61															61

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)	
IP054b		Allocation (SP46^)	Land between Old Cattle Market and Star Lane	B	1.08	0	40	40	0									40							40	
IP059	16/01220	Outline (S106) (SP3)	Elton Park Industrial Estate, Hadleigh Road (128 dwellings (approx 103 in IBC) & 60 bed care home)	B	2.97	0	103	103	103			34	34	35												103
IP061	UC064	Allocation (SP14#)	School Site, Lavenham Road	G	0.9	0	23	23	23				12	11												23
IP064a		Allocation (SP26)	Holywells Road east	B	1.2	0	66	66	0						15	30	21									66
IP066	UC069	Allocation (SP2)	JJ Wilson, White Elm Street and land to rear at Cavendish Street	B	0.85	0	55	55	14					14	8	26							7			55
IP067a		Allocation (SP2)	Former British Energy site (north)	B	0.38	0	17	17	0												17					17
IP074	16/01179	Full - expired (SP27)	Land at Upper Orwell Street	B	0.07	0	9	9	9				9													9
IP080	UC085	Allocation (SP26)	240 Wherstead Road	B	0.49	0	27	27	0							27										27
IP084a	18/01117	Full (S106) (SP27)	County Hall, St Helen's Street	B	0.32	0	40	40	40					40												40
IP089	UC096	Allocation (SP26)	Waterworks Street	B	0.31	0	23	23	0											23						23
IP096	19/00768	Full - approved (SP3)	Car Park Handford Rd East	B	0.22	0	22	22	22	22																22
IP098	UC111	Allocation (SP26)	Transco, south of Patteson Road	B	0.57	0	62	62	0									30	32							62
IP105	UC129	Allocation (SP2)	Depot, Beaconsfield Road	B	0.34	0	15	15	0							15										15
IP109	20/01066	Full - approved (SP3)	The Drift, Woodbridge Road	B	0.32	0	6	6	6		6															6
IP119		Allocation (SP47^)	West End Road (East)	B	0.61	0	28	28	0										28							28
IP120b		Allocation (SP26)	West End Road (West)	B	1.03	0	103	103	0												22	39	42			103

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)
IP125		Allocation (SP2)	Corner of Hawke Road and Holbrook Road	B	0.25	0	15	15	15			15													15
IP132	10/00343	Allocation (SP48^) (Full - expired)	Former St Peters Warehouse Site, 4 College Street / Bridge Street (Northern Quays west)	B	0.18	0	73	73	0							36	37								73
IP133	10/00418	Allocation (SP26) (Full - expired)	South of Felaw Street	B	0.37	0	45	45	0								45								45
IP135	11/00247	Allocation (SP2) (Outline - expired)	112 - 116 Bramford Road	B	0.17	0	19	19	0						19										19
IP136	UC251	Allocation (SP49^)	Silo, College Street	B	0.16	0	48	48	0									24	24						48
IP142	17/00570	Full - approved (SP27)	Land at Duke Street	B	0.39	0	44	44	44		16		28												44
IP143	17/00769	Outline - approved (SP3)	Former Norsk Hydro Ltd, Sandyhill Lane	B	4.5	0	85	85	85				40	45											85
IP150a (part)	20/00781	Full - approved (SP3)	Land south of Ravenswood (sites U, V and W)	B	2.23	0	96	96	96		5	91													96
IP150d		Allocation (SP9#)	Land south of Ravenswood (Sports Park)	B	1.8	0	34	34	0							34									34
IP150e		Allocation (SP9#)	Land south of Ravenswood	B	3.6	0	126	126	42					42	42	42									126
IP161	19/00065	Full - approved (SP3)	2 Park Road	B	0.35	0	13	13	13			13													13
IP169	15/00393	Full - approved (SP27)	23-25 Burrell Road	B	0.08	12	2	14	2	2															2
IP172	UC088 08/00511	Allocation (SP26) (Full - expired)	15-19 St Margaret's Green	B	0.08	0	9	9	0						9										9

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)
IP188	19/00173	Full - approved (SP27)	Websters Saleyard site, Dock Street	B	0.11	0	9	9	0							9									9
IP200	17/00382, 20/00747, 21/00165 (also 05/00819 11/00432 & 13/00346)	Full - approved (SP27)	Griffin Wharf, Bath Street	B	4.7	185	18	203	18	18															18
IP205	02/01241 19/00624	Full - approved (SP27)	Burton's, College Street	B	0.1	71	9	80	9				9												9
IP206	04/00313	Full - approved (SP27)	Cranfields (16 flats replaced by 16/00092/VC below)	B	0.71	196	124	320	0						42	42	40								124
IP206	16/00092	Full - approved (SP27)	Cranfields (Mill House)	B	0	33	10	43	10			10													10
IP218	(15/00422) 21/00578	Prior Approval - approved	31-37 St Helen's Street	B	0.4	12	3	15	3	3															3
IP221	06/01007	Allocation (SP2) (Full - expired)	Flying Horse PH, 4 Waterford Road	B	0.35	0	12	12	0									12							12
IP234	06/01176 19/00062	Full - approved & pending	Land adjacent 30 Gibbons Street	B	0.03	0	2	2	2			2													2
IP245	18/00899	Full - approved (SP27)	12-12a Arcade Street	B	0.06	0	14	14	14				14												14
IP256	21/01148	Full - pending (SP3)	Artificial Hockey Pitch, Ipswich Sports Club, Henley Road	B	0.87	0	21	21	21				21												21
IP271	21/00733	Prior Approval - approved	2-3 Friars Courtyard, 30-32 Princes Street	B	0.02	0	6	6	6		6														6
IP274	16/00763	Full - approved (SP3)	Old Norwich Road (rear of Maypole PH)	G	0.39	0	11	11	11					11											11

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)	
IP279a	21/00431	Prior Approval - approved (SP27)	Former British Telecom, Bibb Way	B	0.53	0	78	78	78			78														78
IP279b (1)	21/00456	Full - approved (SP27)	North of former British Telecom offices, Bibb Way fronting Handford Road	B	0.5	0	39	39	39			39														39
IP279b (2)	21/00456	Full - approved (SP27)	South of former British Telecom offices, Bibb Way	B	0.62	0	33	33	33			33														33
IP280	14/01039 & 17/00489	Full - approved (SP3)	Phase 4 Westerfield House, Humber Doucy Lane	B	0.06	0	5	5	5		5															5
IP280	14/01039 & 17/00489	Full - approved (SP3)	Phase 5 Westerfield House, Humber Doucy Lane (38 bed care home – 21 equivalent dwellings)*	B	0.3	0	21	21	21		21															21
IP280	18/00526 22/00054	Outline - approved (SP3) (and Reserved Matters - pending)	Care Village at Westerfield House, Humber Doucy Lane	G	3.08	0	149	149	149			29	72	48												149
IP283	17/00049	Full - approved (SP27)	25 Grimwade Street. Student Union Club and adjacent car park, Rope Walk	B	0.27	0	14	14	14		14															14
IP307	20/00367	Full - approved (SP3)	Prince of Wales Drive	B	0.27	0	15	15	15			15														15
IP309		Allocation (SP26)	Former Bridgeward Social Club, 68a Austin Street and amenity land rear of 18-42 Austin Street	B	0.29	0	15	15	15				15													15
IP333	19/00325	Full approved	Land rear of 133 to 139 Valley Road	G	0.49	0	7	7	7			7														7
IP354		Allocation (SP26)	72 (Old Boatyard) Cullingham Road	B	0.34	0	14	14	0						14											14

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)
IP355		Allocation (SP26)	77-79 Cullingham Road	B	0.06	0	5	5	0						5										5
IP361	21/00242	Prior Approval - approved	3-4 Lower Brook Mews	B	0.02	0	6	6	6		6														6
IP362	19/00804 21/00809	Prior Approval - approved	39 Princes Street	B	0.03	0	16	16	16	16															16
IP376	19/00890 21/00135	Prior Approval and Full - approved	Rear of 9-13 St Matthew's Street, Chapman Lane	B	0.04	0	11	11	11	4		7													11
IP384	19/00497	Full approved	64-70 Foundation Street	B	0.03	0	8	8	8	8															8
IP385	19/01048 21/00132	Full approved	9-11 Museum Street	B	0.51	0	9	9	9	9															9
IP386	19/01118	Full - approved (SP27)	28-50 Grimwade Street	B	0.15	-3	16	13	16	16															16
IP390	19/01141	Full approved	22-26 Museum Street	B	0.04	0	9	9	9	9															9
IP392	19/00159	Full approved	Highview Hotel, 56 Belstead Road IP2 8BE	B	0.19	0	8	8	8		8														8
IP395	20/00314	Full - approved	The Rivers Social Club, Landseer Road IP3 0AZ	B	0.23	0	6	6	6			6													6
IP396	20/00340	Full approved	First and second floors 6-16 High Street	B	0.02	0	6	6	6	6															6
IP403	21/00394	Full - approved	8-10 Princes Street	B	0.03	0	8	8	8		8														8
IP404	21/00449	Prior Approval - approved	17 Lower Brook Street	B	0.3	0	49	49	49		49														49
IP405	21/00829	Prior Approval - approved	Elm House, 25 Elm Street IP1 2AD	B	0.14	0	25	25	25			25													25
IP406	21/00833	Prior Approval - approved	31 Princes Street	B	0.09	0	35	35	35			35													35

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)
IP407	21/00837	Prior Approval - approved	St Clare House, Princes Street	B	0.18	0	111	111	111		50	61													111
IP408	21/01030	Prior Approval - approved	50 - 56 Wykes Bishop Street IP3 0DT	B	0.03	0	6	6	6			6													6
IP180 (part)	16/00608 20/00250	Strategic Development Site (Outline/Full and Reserved Matters approved)	Henley Gate Neighbourhood, Ipswich Garden Suburb (North of railway and east of Henley Road). Crest Nicholson. Includes Phase 1 (20/00250/REM - 130 dwellings) and Phase 2	G	42.7	0	1,100	1,100	530	56	99	130	130	115	80	80	80	80	50	50	50	50	50		1,100
IP181 (part)	14/00638	Strategic Development Site (Outline/Full approved)	Fonnerneau Neighbourhood, Ipswich Garden Suburb (Land to south of railway line, Westerfield Road). CBRE.	G	21.7	0	375	375	0							84	84	84	84	39					375
IP181 (part)	14/00638	Strategic Development Site (Outline/ Full approved)	Fonnerneau Neighbourhood, Ipswich Garden Suburb (Land to south of railway line, Westerfield Road). Bellway Homes.	G	21.6	0	440	440	180			60	60	60	60	60	60	80							440
IP182 (part)	22/00013	Strategic Development Site (Outline/Full pending)	Red House Neighbourhood, Ipswich Garden Suburb (Land to the east of Westerfield Road and south of the railway line). Mersea Homes.	G	53.1	0	945	945	189			21	84	84	84	84	84	84	84	84	84	84	84	75	945
IP182 part	22/00013	Strategic Development Site (Outline/Full pending)	Red House Neighbourhood, Ipswich Garden Suburb (Land to the east of Westerfield Road and south of the railway line). Anderson Group.	G	6.1	0	70	70	60			10	25	25	10										70

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Dwellings built to date	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	2022/23 (Yr 1)	2023/24 (Yr 2)	2024/25 (Yr 3)	2025/26 (Yr 4)	2026/27 (Yr 5)	2027/28 (Yr 6)	2028/29 (Yr 7)	2029/30 (Yr 8)	2030/31 (Yr 9)	2031/32 (Yr 10)	2032/33 (Yr 11)	2033/34 (Yr 12)	2034/35 (Yr 13)	2035/36 (Yr 14)	2036/37 (Yr 15)#	Total Identified Supply (2022/23 – 2035/36)	
IP185 & part IP180		Strategic Development Site	Remaining land at Ipswich Garden Suburb. (Ipswich School, part of Fonnereau Neighbourhood and remaining land at Henley Gate Neighbourhood)	G	19.7	0	400	400	0										80	80	80	80	80	80	400	
ISPA 4.1		Allocation (ISPA4)	Humber Doucy Lane adjacent to Tuddenham Road	G	23.28	0	449	449	0										53	99	99	99	99		449	
Various	Various	Full/Outline Approved	Sites with fewer than 5 dwellings	G	1.26	-1	28	27	28	12	13	3													28	
Various	Various	Full/Outline Approved	Sites with fewer than 5 dwellings	B	1.75	-3	92	89	92	29	34	29													92	
Windfall			Windfall sites	B		0	550	550	100				50	50	50	50	50	50	50	50	50	50	50	50	550	
Total							8,662	9,198	2,849	212	448	842	676	671	628	904	725	736	670	619	548	501	482	205	8,662	
Brownfield Total										1,672	144	336	582	293	317	367	568	417	375	286	234	235	188	169	50	4,511
Greenfield Total										1,177	68	112	260	383	354	261	336	308	361	384	385	313	313	313	155	4,151

Year 15 has been added for illustrative purposes but falls outside the Local Plan period of 2018-2036

* In accordance with The Planning Practice Guidance (Paragraph 68-035-20190722) residential institutions in Use Class C2 can be included in the housing land supply based on the amount of accommodation released in the housing market against a formula using the Borough population. As a result of applying this formula, the Council has applied a ratio of 1 dwelling for every 1.8 care home bedrooms.

Appendix 4 – Objective 4:

IP-One Development

Objective:

Development in the Borough should be focused primarily within the central 'IP-One' area and within and adjacent to identified district centres (these areas are identified on the key diagram in the Core Strategy).

Target:

Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres.

Commentary:

The NPPF dictates that planning policies should promote competitive town centre environments recognising them as the heart of their communities as well as defining a network and hierarchy of centres. It also requires planning policies and decision to promote the effective use of land it meeting the needs for homes and other uses. Town Centres offer distinct sustainability benefits, in terms of giving as many people access to facilities, jobs, shops, schools, community and leisure facilities within easy reach, thus reducing the need to travel by creating opportunities for trip sharing.

Five year land supply figures indicate comparative numbers of dwellings completed and projected on 'greenfield' and previously developed sites. Of the 2,849 dwellings anticipated to come forward for development between 1st April 2022 and 31st March 2027, 1,672 (62%) are located on previously developed sites.

Of 171 new homes completed in the 2021-22 monitoring period 93% were constructed on previously developed land; 57.3% were completed within the IP-One area; and 93.6% (160 dwellings) were built within 800 metres of a District Centre and/or the Central Shopping Area.

Policy DM30 of the Core Strategy provides for higher densities for new housing development within the town centre, Ipswich Village and Waterfront areas. In these locations it is stated that development should achieve a minimum density of 90 dwellings per hectare. Within the IP-One area more generally, a minimum density of 40 dwellings per hectare is sought with an average of 45 dwellings per hectare targeted. The same requirements apply to development sites located within 800m of District Centres. Elsewhere in Ipswich lower density development (averaging 35 dwellings per hectare) is required.

32 of the 79 new build housing completions recorded in Ipswich between 1st April 2021 and 31st March 2022 were located within developments of 10 dwellings or more. The density of development achieved in Ipswich is monitored on these larger sites. Of these 32 dwellings:

- 32 (100%) were within Waterfront schemes in the IP-One area;
- 0 (0%) were completed as flats;
- 0 were developed at less than 30 dwellings per hectare (0%);
- 18 were developed at between 30 and 50 dwellings per hectare (56%);
- 14 were developed at over 50 dwellings per hectare (44%); and
- The average net density of land covered by the 130 dwellings is 47.1 dwellings per hectare.

Taken as a whole, 79 of the 171 dwellings constructed in Ipswich were new-build (as opposed to conversion of buildings from other uses to residential) and the density achieved was 42.3 per hectare. This figure includes a number of sites with a small number of dwellings.

Table 19: Previously Developed Land (Vacant or Derelict)

Indicator:

Indicator 1 – Previously developed land that has been vacant or derelict for more than five years

Not monitored during the period because this indicator related to the National Land Use Database scheme, which the Government ceased to commission after 2012.

Table 20: Density of Residential Development in IP-One

Indicator 2 – Density of residential development taking place in IP-One

98 (32%) of the 171 new dwellings completed were in the IP-One area. 71 dwellings were completed within the IP-One area on developments of more than 10 dwellings.

Location	Number of new dwellings completed 2021-2022	Density across whole development
Land at Discovery Avenue (Griffin Wharf)	32	44.4
15-17 Princes Street*	16	320.0
23-25 Burrell Road*	2	172.8
6-10 Cox Lane and 36-46 Carr Street*	21	180.0
	71	

*not a new build development

Table 21: Schemes in IP-One (Mix of Uses)

Indicator 3 – Percentage of major schemes in IP-One consisting of a mix of uses

57.3% of dwellings built in 2021/22 were in the IP-One area.

Target – Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres

Of the 171 housing completions between 1st April 2021 and 31st March 2022, 79 were in major developments. All 79 dwellings (100%) were within the IP-One area and/or 800 metres of a district centre or the central shopping area.

Of the 1,136 housing completions (1,058 excluding care homes) between 1st April 2018 and 31st March 2022, 833 were in major developments. Of these 85.8% (715 dwellings) were within the IP-One area and/or 800 metres of a district centre or the central shopping area.

Appendix 5 – Objective 5: Strategic Facilities

Objective:

Opportunities shall be provided to improve strategic facilities in Ipswich by:

- Significantly enhancing the town centre in terms of quantity and quality of the shops, the cultural offer and the network of public spaces;
- Extending the strategic greenspace, ecological network and canopy cover; and
- Continuing to support the development of University of Suffolk and Suffolk New College.

Target:

To improve retail ranking of Ipswich by 2031 and complete the 'green rim'.

Commentary

The attractiveness of Ipswich to members of the local community, tourists and day visitors is important in ensuring economic growth for the town. The amount of retail space for high quality shopping areas, employment floor space for jobs, in addition to the amount of green infrastructure provision, and further education student numbers, are all seen as means by which the level of provision of these strategic facilities can be monitored.

The available evidence suggests that Ipswich Town Centre is performing reasonably well in relation to the wider market and continues to provide a variety of national and independent traders. The town centre accommodates a high proportion of the 29 Experian Goad defined top comparison goods retailers. However, it is noted that a number of higher brand retailers are absent from the town centre such as Gant, All Saints, Cath Kidston, Ted Baker, Hobbs, Hollister, Jaeger, Jigsaw, French Connection, Karen Millen, Levi's, The White Company, Victoria Secret, Mango, Apple, Crew Clothing, Kurt Geiger, and Fred Perry.

Public realm work to regenerate the Cornhill in Ipswich Town Centre was completed in 2020. The need remains for the focus of new retail development to be within the Central Shopping Area, District Centres and Local Centres and the Council continues to implement policy DM23, which aims to resist major retail proposals outside of defined centres, in this respect.

On the 11 December 2020 the Ipswich Town Investment Plan was submitted to the Government. The Council was successful in securing £25 million to help deliver 11 projects. The projects included re-development of the Old Post Office Building on the Cornhill which is now occupied by The Botanist restaurant and cocktail lounge. The funds are also delivering 'greening' of the Waterfront, to enhance the environment. Work is ongoing to deliver other projects such as a digital town centre and new yacht academy to be run by the internationally acclaimed Spirit Yachts. The projects will help to enhance the town centre and continue to aid recovery from the Covid-19 Pandemic.

The Council was unable to carry out any onsite monitoring work in 2020 due to the Coronavirus pandemic. Footfall data for the Town Centre was used in the previous AMR. The Council has undertaken a Town Centre Survey in 2022, therefore this report provides the results of survey data for the 2021/22 AMR monitoring period.

Table 21a Ipswich Town Centre Footfall Data 2019-2021

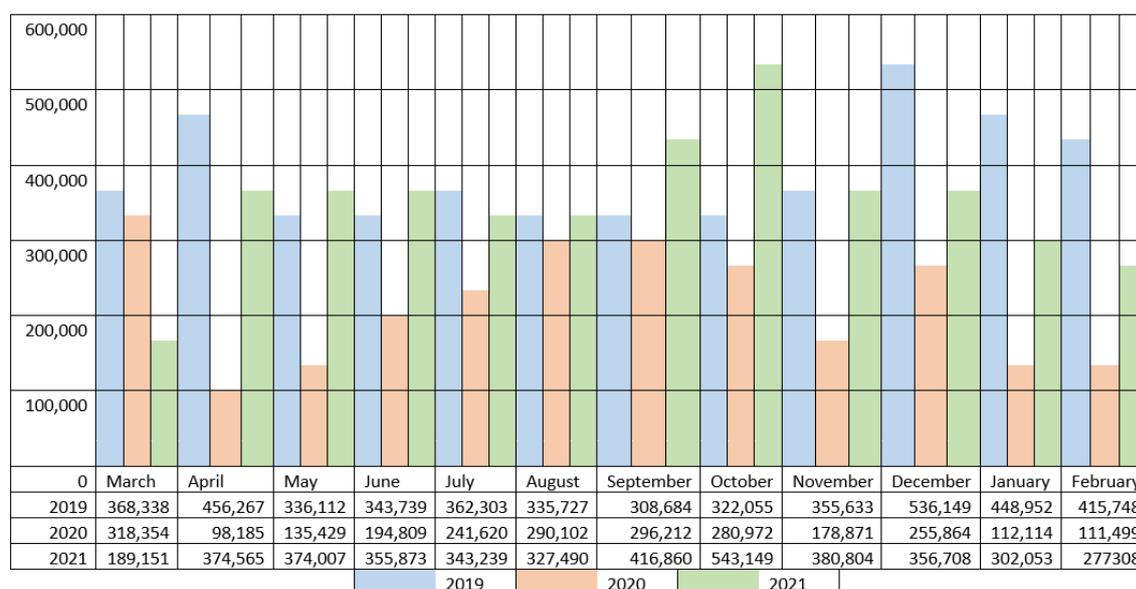


Table 22: Vacancies with Central Shopping Area, District and Local Centres

Percentage vacancies within the Central Shopping Area, and District and Local Centres 2018 compared with 2019					
Centres	% Vacant Premises 17/18	% Vacant Premises 18/19	% Vacant Premises 19/20	% Vacant Premises 20/21	% Vacant Premises 21/22
District and Local Centres	8.3%	4.8%	Data not available	Data not available	4.5%
Town Centre	13.2%	15.0%	Data not available	Data not available	15.1%

Table 23: Ipswich Town Centre Diversity of Use for Commercial Units

	2009/2010		2018/2019		2019/20		2020/21		UK Average
	No.	%	No.	%	No.	%	No.	%	%
Convenience	47	8	54	8	-	-	-	-	9
Comparison	231	37	187	29	-	-	-	-	30
Retail Service	75	12	96	15	-	-	-	-	15
Leisure Service	115	18	141	22	-	-	-	-	24
Financial & Business Service	72	11	74	11	-	-	-	-	10
Vacant	85	14	99	15	-	-	-	-	11
Total	625	100	651	100	0	0	0	0	100

Due to changes to the Use Classes Order, it is no longer possible to assess the number and percentage of units in the above categories. Instead, the number and percentage of units within the different Use Class

categories is provided below. Across the Central Shopping Area, the predominate use remains commercial, business and service uses. The Secondary and Specialist Shopping Areas have been particularly resilient.

Table 23a: Ipswich Town Centre Diversity of Uses by Primary, Secondary and Specialist Areas

Diversity of Uses within the Primary Shopping Area		
	Frontage total %	Occupied frontage total %
Commercial, Business and Services (Class E)	90.9	71.1
Sui Generis	6.9	6.4
Hotel (Class C1)	1.4	1.4
Dwellinghouse (Class C3)	0	0
Local Community and Learning (Class F1)	0	0
Assembly and Leisure (Class D2)	6.6	6.6

Diversity of Uses within the Secondary Shopping Area		
	Frontage total %	Occupied frontage total %
Commercial, Business and Services (Class E)	89.3	80.7
Sui Generis	10.3	8.5
Hotel (Class C1)	0.4	0.4
Dwellinghouse (Class C3)	0	0
Local Community and Learning (Class F1)	0	0
Assembly and Leisure (Class D2)	0	0

Diversity of Uses within Specialist Shopping Area		
	Frontage total %	Occupied frontage total %
Commercial, Business and Services (Class E)	76.1	69.4
Sui Generis	20.5	15.6
Hotel (Class C1)	0.1	0.1
Dwellinghouse (Class C3)	3.4	3.4
Local Community and Learning (Class F1)	0	0
Assembly and Leisure (Class D2)	0	0

Table 24: Ipswich Town Centre Diversity of Use for Commercial Floorspace

	2009/2010		2018/2019		2019/20		2020/21		UK Average
	Sq m Gross	%	Sq m Gross	%	Sq m Gross	%	Sq m Gross	%	%
Convenience	7,702	5	9,370	6	-	-	-	-	15
Comparison	75,409	50	57,870	39	-	-	-	-	35
Retail Service	7,664	5	8,060	5	-	-	-	-	7
Leisure Service	28,893	19	35,880	24	-	-	-	-	25
Financial & Business Service	12,886	9	13,730	9	-	-	-	-	8
Vacant	18,934	13	23,570	16	-	-	-	-	10
Total	151,488	100	148,564	100	0	0	0	0	100

The Retail and Commercial Leisure Study (October 2017) shows that Ipswich is identified as a Regional Centre and has seen a slight improvement in its ranking over the last seven years. During the pandemic one of the centres anchor retail stores went into administration leaving the unit vacant.

Table 25: Sub-regional Centre Rankings

Centre	Classification	2009 Rank	2015-16 Rank	2017 Rank	Change in Rank 2009-2017
Norwich	Major City	8	14	13	-5
Cambridge	Major Regional	41	26	-	+15
Ipswich	Regional	67	63	76	-9
Chelmsford	Regional	90	67	44	+46
Colchester	Regional	76	73	-	+4
Bury St Edmunds	Regional	216	126	124	+92
Felixstowe	Major District	443	384	-	+59
Stowmarket	District	744	629	-	+115
Woodbridge	Minor District	-	1,154	-	-
Saxmundham	Minor District	-	1,486	-	-
Aldeburgh	Local	-	2,577	-	-

Source: VenueScore 2009 and 2017 Rankings (latest available data)

There are 90 play areas in the Borough which has increased over recent years. During the monitoring period Christchurch Park and Holywells Park retained their Green Flag Park Awards and for the first time Bourne Park was awarded a Green Flag Park Award. The Green Flag Award is given in recognition of the excellent use of green space, well-maintained facilities and high standard of safety and security. In addition, Christchurch Park and Holywells Park were also nominated for the Fields In Trust UK's Best Park 2019.

Table 26: Frontages Within Use Class A1 in the Ipswich Central Shopping Area

Indicator 1 - A1 retail floorspace in the Central Shopping Area						
	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021
% of frontages within use class A1	64%	59.2%	58.7%	58.3%	Data not available	Data not available
% change		-4.8%	-0.5%	-0.4%	Data not available	Data not available

Use Class A1 was scrapped as a result of the government's review of the Uses Classes Order, as such this data is no longer available.

Table 27: District and Local Centres Overview

	DISTRICT AND LOCAL CENTRE 2021/2022 Overview 2021/22											
	Use Class (Quantity)						Use Class (Percentage)					
CENTRE	E	B2-B8	C	F	SG	VACANT	E	B2-B8	C	F	SG	VACANT
LOCAL	242	1	48	4	100	20	62.1%	0.2%	0.0%	1.7%	32.8%	3.8%
DISTRICT	221	2	24	2	72	30	75.4%	1.3%	0.4%	0.5%	22.3%	6.7%
TOTAL	463	3	72	6	172	50	65.4%	0.5%	0.1%	1.4%	30.2%	4.5%

There has been little change in the makeup of Ipswich's District and Local Shopping Centres since the last survey in 2018/19. 21 previously vacant units have become occupied. 4.9% of premises across the District and Local Centres are vacant compared with 4.8% of premises in 2019. The data appears to illustrate overall occupancy resilience despite the COVID 19 pandemic.

Table 28: Additional Employment Floorspace at Crane's Site

Indicator 2 - Additional employment floorspace at former Crane's Site now Futura Park								
	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-21	2021-22
Total Employment Floor Space (sq. m)	0	0	46,080	49,941	55,565	61,189	-	-

Table 29: Gains in Green Infrastructure within Ipswich

Indicator 3 - Gains in Green Infrastructure within Ipswich (ha)	
Ipswich Green Flag Parks	
Bourne Park	2021/22 – 2 nd occasion awarded Green Flag status.
Christchurch Park	2021/22 – 14 th occasion awarded Green Flag status.
Holywells Park	2021/22 - 11 th occasion awarded Green Flag status.

Table 30: Student Numbers at University of Suffolk and Suffolk New College

Indicator 4 - Number of students at University of Suffolk and Suffolk New College											
	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022
University of Suffolk* (Ipswich only)	3,839	3,925	3,679	3,554	3,614	3,579	3,709	3,740	3,858	3,876	4154 ⁶
Suffolk New College **	5,774	5,741	4,053	4,029	3,921	3,000	3,742				2,865 ⁷
Total	9,613	9,666	7,732	7,583	7,535	6,579	7,451	3,740	3,858	3,876	7019

Please note that University Campus Suffolk legally began trading as the University of Suffolk on 1 August 2016

* Figures provided show the total number of students enrolling in the Ipswich Campus of University Campus Suffolk across all years and courses, and is based on a census of students taken on 1 December each year.

** Figures show the total number of student enrolments.

Table 31: deleted.

⁶ 4154 provided directly by UOS Market Development Department and is only the Ipswich Based UOS students. 2021/2022 enrolment figures from HESA state 14555 total enrolled students (across UK and the World) – source: <https://www.hesa.ac.uk/news/19-01-2023/sb265-higher-education-student-statistics/location>

⁷ [Policies, Reports and Statements - Suffolk New College](#)

Appendix 6 – Objective 6: Accessibility

Objective:

To improve accessibility to and the convenience of all forms of transport, and achieve significant modal shift from the car to more sustainable modes through the Travel Ipswich and other local initiatives. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative 'green' non-vehicular access around the town and urban greening of existing routes.

Specifically:

- Significant improvements should take place to the accessibility to and between the three key nodes of: the railway station (including the wider Ipswich Village environment), the Waterfront (and particularly the Education Quarter) and the Central Shopping Area;
- Additional east-west highway capacity could be provided within the plan period in the Ipswich area to meet the needs of the wider population and to provide the potential to reallocate some central road space;
- Comprehensive cycle routes should be provided; and
- Ipswich Borough Council aspires to an enhanced public transport system.

Target:

To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031. The Travel Ipswich scheme is now complete the final stage having been implemented in 2017.

Objective 6 of the Core Strategy and Policies DPD Review seeks to improve accessibility, the convenience of all forms of public transport, and to achieve a significant modal shift from the private car to more sustainable modes through Travel Ipswich and other local initiatives, within the plan period.

In 2011 the requirement for Local Authorities to report back to central government on a single set of national indicators was removed. Instead, local authorities have been able to set their own delivery targets, to reflect local circumstances.

The monitoring of this Objective is not currently possible. This is because the indicators that were taken from the Local Area Agreement and were part of the national set of indicators, are no longer being monitored. (As part of the Ipswich Local Plan Review 2018-2036 the indicators for objective six have been reviewed and changes have been made to the monitoring process).

The Ipswich Strategic Planning Area Board provides a mechanism for co-operation in relation to the requirements for, and delivery of, infrastructure and modal shift arising from development in local plans. The modal shift measures are likely to also have a positive effect on mitigating impacts on air quality within Ipswich.

The Travel to Work Survey is undertaken and published each year by Suffolk County Council. The 2021 survey results showed that, of the baseline employers that took part in the survey for this period, driving by car (single occupant or carshare), either as the primary (54.4%) or sometimes used (60.3%) mode of transport, remains the most popular way to travel. This is an increase from the 2020 survey results showed that driving by car (single occupant or carshare),

primary was 44.9% and 51.3% for sometimes used (51.3%). The ongoing aftereffects of the Coronavirus pandemic show that working from home remains high at 21.4%, but is less than 2020 (40.8%).

The 2021 Travel to Work survey ran from the 4th October to 15th November 2020, later in the year than planned, due to the ongoing effects of the Coronavirus pandemic. The 2021 survey showed that driving by car (single occupant or carshare), either as the 'primary' (54.4%) or 'sometimes used' (60.3%) mode of transport, remains the most popular mode of travel and the only one which has reached figures close to pre-pandemic rates. The use of public transport remains low compared to pre-pandemic figures, as only 3.5% travel by bus and 2.2% by train as their primary mode of transport, although both have increased slightly since 2020.

In addition to the Travel to Work Survey data, the following sites held a nationally recognised Modeshift STARS Accreditation in 2021-22 for their Travel Plan implementation:

- Modeshift STARS Business Bronze Accreditation - Fred Olsen, White House Road
- Modeshift STARS Education Bronze Accreditation – Copleston High School
- Modeshift STARS Education Green Accreditation – Castle Hill Primary School
- Modeshift STARS Community Bronze Accreditation – Ribbons Park, Foxhall Road. This was the first travel plan accreditation for a residential scheme in the country.

Table 32: Transport Indicators

Indicators:

Indicators 1 – Congestion - average journey time per mile during the morning peak

Indicators 2 - Access to services and facilities by public transport, walking and cycling

Indicators 1 and 2 are based on the former National Indicator list and are no longer monitored as part of the Local Area Agreements with central government.

Target - To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031

Indicators 3 - Mode of travel to work to major employers (Source SCC Travel to Work Report October 2021)

Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Travel mode																
Bus	7.7%	9.2%	7.1%	5.9%	5.4%	5.0%	4.9%	5.5%	5.1%	5.2%	5.3%	5.8%	5.1%	5.7%	2.8%	3.5%
Car driver- single occupant	55.4%	52.2%	55.6%	55.1%	56.1%	55.4%	57.0%	53.4%	53.4%	57.4%	53.9%	53.5%	56.0%	52.5%	41.5%	50.9%
Car driver- car share	13.2%	13.5%	8.7%	9.7%	9.4%	8.9%	9.6%	9.6%	8.9%	8.7%	10.8%	9.1%	8.7%	9.2%	3.4%	4.8%
Car passenger	3.3%	3.6%	3.8%	4.0%	3.6%	3.1%	3.1%	3.5%	3.3%	2.6%	2.5%	2.6%	2.1%	2.6%	0.7%	1.2%
Cycle	7.4%	7.4%	8.3%	7.9%	7.7%	9.6%	8.3%	9.2%	8.4%	7.9%	10.3%	6.9%	9.3%	7.6%	4.1%	6.0%
Motorcycle/moped/motor scooter	1.7%	1.7%	1.5%	1.4%	0.9%	1.3%	0.8%	0.8%	1.0%	0.7%	1.0%	0.6%	0.8%	0.3%	0.4%	0.7%
Park & Ride	0.7%	1.0%	1.3%	1.2%	1.4%	1.0%	1.1%	1.1%	1.6%	1.3%	0.5%	0.9%	1.9%	1.9%	0.1%	0.6%
Train	1.6%	2.1%	2.9%	3.2%	3.4%	3.5%	3.9%	4.6%	5.3%	4.1%	3.6%	7.2%	4.6%	5.9%	0.6%	2.2%
Walk	8.3%	8.4%	9.8%	10.2%	10.5%	10.1%	9.6%	9.9%	12.1%	11.6%	11.1%	13.1%	9.8%	12.4%	5.0%	6.6%
Work from home	0.6%	0.7%	1.0%	1.2%	1.4%	1.9%	1.6%	1.6%	1.0%	0.6%	0.9%	0.4%	0.5%	0.3%	39.2%	21.4%
Other mode of transport	0.1%	0.2%	0.1%	0.1%	0.1%	0.1%	0.1%	0.8%	0.0%	0.0%	0.1%	0.1%	0.8%	1.8%	2.3%	1.2%

The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan Review.

Appendix 7 – Objective 7: Flood Protection

Objective:

Enhanced flood protection including a tidal surge barrier to be in place to protect the town's existing and expanding communities from the threat of tidal flooding.

Target:

Implementation of tidal surge barrier by the end of 2019.

Ipswich is located where the fluvial River Gipping becomes the tidal River Orwell. The town has historically been at risk of tidal flooding and river flooding. Parts of the town are also at risk of flooding from surface water runoff and exceedance of the local drainage network.

The Council has been working with the Environment Agency (EA) and other partners on an Ipswich Flood Defence Management Strategy. The EA announced in March 2008 that the first phase of funding for a £45-£50 million solution to Ipswich's flood defence had been secured.

A tidal surge barrier across the River Orwell is a key part of the Strategy. The barrier is located across the New Cut, opposite the Island site, and it was completed in spring 2019. This will safeguard the town from a one in 300 chance of flooding in any one year due to a tidal surge. The first stage of this project was completed in December 2008, which saw the replacement of flood gates at the Wet Dock Lock. Construction of the East and West Bank flood defence walls was completed in early 2011.

The Council has adopted a new Development and Flood Risk Supplementary Planning Document (SPD), replacing the version published in 2016. The purpose of this Development and Flood Risk SPD is to help developers and their agents to submit appropriate flood risk and flood risk management information with planning applications in Ipswich. The SPD has been prepared in collaboration with the EA, Suffolk County Council in their capacity as the Lead Local Flood Authority (LLFA), Suffolk Joint Emergency Planning Unit and Anglian Water. The Draft Development and Flood Risk SPD was subject to a six week public consultation between the 10 August 2021 and 21 September 2021 and adopted in July 2022.

Flood risk is a key planning consideration. In 2021-2022 the EA was advised of 47 applications in Ipswich where flood risk or water quality was an issue. Of these, 25 were approved, 0 were approved subject to a Section 106 Agreement, 4 were part approved/part refused, 4 were withdrawn, 4 were refused, 5 have yet to be decided and 5 required prior approval.

Table 33: Applications subject to Environment Agency Consultation

<i>Indicator 1 - Applications that were subject to Environment Agency Consultation</i>	
Reference	Address
21/00045/P3JPA	39A Lower Brook Street, Ipswich IP4 1AQ
21/00323/CON	Land North Of Railway And East Of Henley Road, Ipswich
21/00384/FUL	Car Parking And Amenity Area Adjacent To 2 To 6 Russell Road, Ipswich
21/00408/FUL	Land Adjacent To 2 Anglia Parkway North, Ipswich
21/00431/P3JPA	British Telecom Local Communications Services, Bibb Way, Ipswich IP1 2EQ

21/00449/P3JPA	17 Lower Brook Street, Ipswich IP4 1DN
21/00456/FUL	British Telecom Local Communications Services, Bibb Way, Ipswich IP1 2EQ
21/00543/FUL	77 - 79 Cullingham Road, Ipswich IP1 2EG
21/00566/FUL	48 - 68 Carr Street, Ipswich IP4 1EW
21/00596/CON	Land at Discovery Avenue, Ipswich
21/00636/VCI3	Burton Son And Sanders Warehouse, St Peters Wharf, Ipswich
21/00640/P3JPA	47 Key Street, Ipswich IP4 1BA
21/00647/FUL	2 - 4 Russell Road, Ipswich IP1 2BE
21/00659/P3JPA	17 Lower Brook Street, Ipswich IP4 1DN
21/00662/CON	Land at Discovery Avenue, Ipswich
21/00748/CON	25 Grimwade Street Student Union Club And Adjacent Car Parking Areas, Rope Walk, Ipswich
21/00756/VC	Shell Service Station, A14 Ipswich By Pass, Ipswich IP10 0NZ
21/00779/CON	Former Land Between Ipswich Railway Station And London Road, Railway Line At Bramford To Wherstead, Ipswich
21/00786/FUL	St Josephs College, Belstead Road, Ipswich IP2 9DR
21/00805/FUL	Former Site Of 50 Russet Road, Ipswich
21/00831/FUL	665 Norwich Road, Ipswich IP1 6JZ
21/00837/P3JPA	St Clare House, Princes Street, Ipswich
21/00839/FUL	Tented Building, Eagle Wharf, Ipswich IP3 0FQ
21/00846/CON	Land at Discovery Avenue, Ipswich
21/00847/CON	Land at Discovery Avenue, Ipswich
21/00884/P3JPA	Websters Trade Yard, Dock Street, Ipswich
21/00926/CON	Land To South Of Railway Line, Westerfield Road, Ipswich
21/01030/P3JPA	50 - 56 Wykes Bishop Street, Ipswich IP3 0DT
21/01062/FUL	Golden Ship Inn, Cliff Road, Ipswich IP3 0AX
21/01079/CON	64 - 70 Foundation Street, Ipswich IP4 1BN
21/01109/REM	Land North Of Railway And East Of Henley Road, Ipswich
21/01124/CON	Land North Of Railway And East Of Henley Road, Ipswich
21/01128/CON	Land North Of Railway And East Of Henley Road, Ipswich
21/01129/CON	Car Parking And Amenity Area Adjacent To 2 To 6 Russell Road, Ipswich
21/01133/VC	Norsk Hydro Ltd, Sandyhill Lane, Ipswich
21/01148/FUL	Ipswich Sports Club, Henley Road, Ipswich IP1 4NJ
21/01263/VC	Development Land Opposite To 1 Crane Boulevard, Ipswich
21/01268/CON	Land North Of Railway And East Of Henley Road, Ipswich
21/01301/P3JPA	47 Key Street, Ipswich IP4 1BA
22/00013/OUTFL	Land To The East Of Westerfield Road And South Of The Railway Line, Red House Farm, Westerfield Road, Ipswich
22/00015/P3JPA	Knapton Court, Turret Lane, Ipswich IP4 1DL
22/00036/REM	Land To South Of Railway Line, Westerfield Road, Ipswich
22/00054/REM	Westerfield House, Humber Doucy Lane, Ipswich IP4 3QG

22/00070/P3JPA	313 Woodbridge Road, Ipswich IP4 4AX
22/00140/FUL	The Mariners, Wherry Quay, Ipswich IP4 1AX
22/00213/CON	Land To South Of Railway Line, Westerfield Road, Ipswich
22/00226/FUL	42 - 54 Foundation Street, Ipswich IP4 1BN

Appendix 8 – Objective 8: Protection of Open Spaces

Objective:

To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and conserve and enhance the historic environment and landscape character of Ipswich, including historic buildings, archaeology and townscape.

Target:

No net loss of natural capital by 2031.

To increase the tree canopy cover in the Borough to 22% by 2050.

A decrease in the number of Ipswich buildings at risk on the Suffolk Buildings at Risk register or no net increase in Ipswich buildings at risk.

A decrease in heritage assets at risk on the Historic England register or no net increase in Heritage Assets at risk.

During the monitoring period there was no change in the extent of protected habitats through the Borough.

Table 34: Summary for Area of Protection

	<i>No. of sites</i>	<i>2020-2021 Site area in hectares</i>	<i>2021-2022 Site area in hectares</i>	<i>Any change in size</i>
Site of Specific Scientific Interest	3	47.47	47.47	No change
Special Protection Areas / RAMSAR sites	1	41.27	41.27	No change
County Wildlife Sites	20	266.87	266.87	No change
Local Nature reserves	9	49.84	49.84	No change
Ancient Woodland	2	3.58	3.58	No change

Table note: in this table, the River Orwell and the Wet Dock are listed as two County Wildlife Sites.

The tree canopy cover target has increased from 15% canopy cover by 2021, to 22% by 2050. Two wards so far have achieved the 22% cover target; St. Margaret's Ward and Stoke Park Ward. Central Ipswich, south west Ipswich and north east Ipswich have met the target of 15% tree canopy cover. The north west and south east areas fell very slightly below the 15% canopy cover target. This is the latest available data.

The Buildings at Risk figure for 2021/22 is made up of two buildings which have been on the register since before 2012 (1-5 College Street and St. Michael's Church), and two which were added in 2012 (Tolly Cobbold Brewery and County Hall). 4 College Street, a 16th Century Grade

II listed Merchant's House, was removed from the register during this monitoring year. Ipswich Borough Council purchase the property, as part of its remodel of the gateway to the Wet Dock from Stoke Bridge and the property has been subject to a comprehensive restoration programme. The restoration project received a Distinction award at the Ipswich Society Annual Awards Evening. Dedicated work is being undertaken with the owners of each of the remaining buildings on the register.

Table 35: County Wildlife Sites –2021-2022

Indicators:

Indicator 1a – County Wildlife Sites

County Wildlife Site	2021 Area (hectares)	2022 Area (hectares)	Total Gain/Loss
Alderman Canal	2.50	2.50	0
Ashground Covert and Alder Carr (area within IBC – total site 15.32)	5.00	5.00	0
Bourne Park Reedbed	7.47	7.47	0
Brazier's Wood, Pond Alder Carr and Meadows	34.92	34.92	0
Bridge Wood (2 parts within IBC – total site 35.79)	2.81	2.81	0
Chantry Park, Beechwater and Meadow	47.12	47.12	0
Christchurch Park including Arboretum	32.93	32.93	0
Dales Road Woodland	5.85	5.85	0
Holywells Park and canal	21.01	21.01	0
Landseer Park Carr	17.25	17.25	0
Pipers Vale (area within IBC – total site 25.62)	25.06	25.06	0
River Gipping	4.61	4.61	0
River Orwell (Wet Dock area)	10.07	10.07	0
River Orwell (river)	30.30	30.30	0
Rushmere Heath (area within IBC – total site 79.68)	8.92	8.92	0
Stoke Park Wood and Fishpond Covert	2.16	2.16	0
Volvo Raeburn Road site	6.27	6.27	0
Wharfedale Road meadow	0.18	0.18	0
Ransomes Europark Heathland	1.64	1.64	0
Bourne Bridge Grassland (area within IBC - total 2.29ha)	0.8	0.8	0

Total	266.87	266.87	0
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Carr: A type of wetland with peaty soils, generally found in low-lying situations, with a distinctive woody vegetation cover consisting of trees.

Table 36: Sites of Special Scientific Interest

<i>Indicator 1b - Sites of Special Scientific Interest –2021-2022</i>			
Name	2021 Area (hectares)	2022 Area (hectares)	Total Gain/Loss (-)
Orwell Estuary (2 parts within IBC)	41.27	41.27	0
Bixley Heath (area within IBC)	4	4	0
Stoke Bridge Railway Tunnel	2.2	2.2	0
Total	47.47	47.47	0

Table 37: Ramsar Sites

<i>Indicator 1c - Ramsar sites –2021-2022</i>			
Name	2021 Area (hectares)	2022 Area (hectares)	Total Gain/Loss (-)
Bed of River Orwell (2 parts within IBC)	41.27	41.27	0
Total	41.27	41.27	0

Table 38: Ancient Woodland

<i>Indicator 1d - Ancient Woodland –2021-2022</i>			
Name	2021 Area (hectares)	2022 Area (hectares)	Total Gain/Loss (-)
Brazier's Wood	3.51	3.51	0
Bridge Wood (area within IBC – whole site 30.51ha)	0.07	0.07	0
Total	3.58	3.58	0

Table 39: Local Nature Reserves

Indicator 1e - Local Nature reserves –2021-2022			
Name	2021 Area (hectares)	2022 Area (hectares)	Total Gain/Loss (-)
Alderman Canal east	1.6	1.6	0
Alderman Canal west	0.98	0.98	0
Bixley Heath (area within IBC)	4	4	0
Bobbit's Lane (area within IBC)	6.33	6.33	0
Bourne Park Reedbeds	7.44	7.44	0
Bridge Wood (area within IBC)	1.78	1.78	0
Piper's Vale	19.67	19.67	0
Stoke Park Wood	2.17	2.17	0
The Dales Open Space	5.87	5.87	0
Total	49.84	49.84	0

Table 40: Suffolk Register of Buildings at Risk

Indicator 2 - Suffolk Register of Buildings at Risk 2021 -2022	
List of buildings on Risk Register	Year Added
1-5 College Street	Prior to 2012
4 College Street	Deleted
Tolly Cobbold Brewery, Cliff Quay	2012
Church of St Michael's, Upper Brook Street	Prior to 2012
County Hall, St Helen's Street	2012
Total	4

Table 41: Tree Canopy Cover 2020

Target - To increase tree canopy cover in the Borough to 22% by 2050%					
Ward	Ward area in hectares	Canopy coverage in hectares 2016	Coverage % 2016	Canopy coverage in hectares 2020	Coverage % 2020
Alexandra Ward	190.19	19.37	10.18	22.6	11.86
Bixley Ward	245.38	30.61	12.47	44.1	17.98
Bridge Ward	217.70	15.82	7.27	22.2	10.18
Castle Hill Ward	175.37	23.42	13.35	27.4	15.65
Gainsborough Ward	364.95	47.69	13.07	60.9	16.70
Gipping Ward	345.90	48.59	14.05	63.1	18.23
Holywells Ward	196.73	27.31	13.88	34.1	17.35
Priory Heath Ward	412.89	25.11	6.08	46.9	11.36
Rushmere Ward	264.52	21.48	8.12	32.3	12.21
Sprites Ward	121.73	7.06	5.80	11.3	9.30
St. John's Ward	162.38	19.75	12.16	25.0	15.42
St. Margaret's Ward	393.69	88.60	22.51	89.5	22.75
Stoke Park Ward	197.04	42.71	21.68	48.9	24.82
Westgate Ward	117.46	11.56	9.84	13.9	11.80
Whitehouse Ward	260.14	28.59	10.99	42.4	16.30
Whitton Ward	363.98	33.62	9.24	40.3	11.08
Total	4030.03	491.28	12.19	624.9	15.5%

The total coverage for this monitoring period is 15.5%.

The 2020 Tree Canopy Cover data is the latest statistical data available.

Appendix 9 – Objective 9: Community Infrastructure

Objective:

To retain and provide high quality schools, health facilities, sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth and ageing population.

Target:

To be developed but will need to meet the requirements of the new provision set out within the indicators which are (1) average class size in Ipswich schools and (2) the percentage of new community facilities located in or within 800m of a centre.

One of the aims of the Core Strategy is to provide high quality schools, health facilities, sports and cultural facilities and to offer key elements of community infrastructure accessible by sustainable means.

The objective seeks to monitor the average class size of schools in Ipswich. Ofsted monitors education facilities on behalf of the Department of Education but does not specifically monitor class sizes, preferring to record teacher to pupil ratios. This ratio is based upon the full time equivalent (FTE) pupils attending a school or college, set against the full time equivalent qualified teachers at the school.

In Suffolk nurseries and primary schools and equivalents the average in 2021 was 21.6 full time pupils (FTE) to each full time equivalent qualified teacher, a decrease from 22.4 in 2020 and is above the national average of 21.5. Secondary schools and equivalents have a ratio of 18.4 full time pupils (FTE) to each full time equivalent qualified teacher, representing a slight increase from 18.2 in the previous year. In Suffolk pupil to teacher ratios are above the national average at 17.1.

Table 42: Ratio of Full Time Equivalent (FTE) Pupils to Full Time Qualified Teachers (latest available data)

<i>Indicator 1 – Ratio of the full time equivalent (FTE) pupils to the full time equivalent qualified teachers at the school.</i>						
	Suffolk 2019	England average 2019	Suffolk 2020	England average 2020	Suffolk 2021	England average 2021
Nursery and primary school average	22.1	21.9	22.4	21.3	21.6	21.5
Secondary school average	18.5	17.2	18.2	17.1	18.4	17.1
16-18 year education average	N/A	N/A	N/A	N/A	N/A	N/A

Appendix 10 – Objective 10: Deprivation

Objective:

To tackle deprivation and inequalities across the town.

Target:

To improve Ipswich's ranking in the indices of multiple deprivation by 2031.

Objective 10 of the Core Strategy is to tackle deprivation and inequality across the town. Deprivation encompasses a range of different issues such as financial security, health, education, and access to services. The indicators for Objective 10 are levels of unemployment in the Ipswich working population (16 - 65 years) and levels of educational attainment.

The unemployment rate in Ipswich stood at 2.8% in the twelve months to June 2022. This is a significant drop to the twelve month period prior, 20220/21 where unemployment was at 4.8%.

Data for Ipswich from the ONS annual population survey January 2021 – December 2022 shows that 37.4% of the working age population is qualified to HND, degree or high degree level. This is lower than the national average which stood at 43.6% between January 2020 and December 2021. Attracting and retaining graduate talent remains a challenge in Ipswich. That said the breadth of qualifications in the workforce attracts a diverse employer base.

The 2019 Indices of Multiple Deprivation (IMD) were published by the Government in September 2019 and are the latest statistics available. The IMD combines information from seven domains to produce an overall relative measure of deprivation. The domains are: Income; Employment; Education; Skills and Training; Health and Disability; Crime; Barriers to Housing Services; Living Environment. Each domain is given a weighting and is based on a basket of indicators. The IDM shows that Ipswich ranked 71 out of 317 local authorities on the Index of Multiple Deprivation (within the 22% most deprived local authorities). Ipswich's ranking in the Index of Multiple Deprivation:

- Income Deprivation 85/317 (27% most deprived)
- Employment Deprivation 84/317 (26% most deprived)
- Education, Skills and Training Deprivation 35/317 (11% most deprived)
- Health Deprivation and Disability 69/317 (22% most deprived)
- Crime 52/317 (17% most deprived)
- Barriers to Housing and Services 203/317 (46% least deprived)
- Living Environment Deprivation 78/317 (25% most deprived)

A report published by the Child Poverty Action Group and the Church of England in September 2020, titled Poverty in the Pandemic: The Impact of Coronavirus on Low-income Families and Children, suggests that around 8 in 10 respondents reported a significant deterioration in their living standards due to a combination of falling income and rising expenditure. Therefore, it may be that in some cases, families in Ipswich are more negatively affected by the COVID-19 pandemic than those in neighbouring authorities.

Table 43: Percentage of those Unemployed Ages 16 – 64

Fig 10.1 - Percentage of those unemployed ages 16 - 64		
Date	Ipswich total	Ipswich %
Apr 10 - Mar 11	5,600	8.4
Apr 11 - Mar 12	6,000	8.6
Apr 12 - Mar 13	6,800	9.7
Apr 13 - Mar 14	5,600	8.0
Apr 14 - Mar 15	4,700	6.5
Apr 15 - Mar 16	3,500	5.1
Apr 16 - Mar 17	3,400	5.0
Apr 17 - Mar 18	3,300	4.6
Apr 18 – Mar 19	3,000	4.1
Apr 19 – Mar 20	3,200	4.5
Apr 20 – Mar 21	3,600	5.1
Apr 21 – Mar 22	2,500	3.1

**All data on unemployment taken from Nomis (ONS).
Numbers and % are for those aged 16 and over. % is a proportion of economically active*

Table 44: Percentage of Students Achieving Level 4 or above English and Maths

This data is no longer recorded and the time series data for the new metric is not currently available.

Table 45: Secondary School Pupils Achieving 5+ A* - C GCSE English and Maths

This data is no longer recorded and the time series data for the new metric is not currently available.

Table 46: KS5 gaining 3 or more A Levels at A* - E

This data is no longer recorded and the time series data for the new metric is not currently available.

Table 47: Ipswich Rankings on Indices of Multiple Deprivation 2019 (latest available data)

Target - Ipswich rank in indices of multiple deprivation. Rank of average rank (1-326), where 1 is most deprived.						
	2000	2004	2007	2010	2015	2019
Indices of Multiple Deprivation - Ipswich	110	98	99	83	74	71

Table 48: Ipswich Rank on Indices of Multiple Deprivation 2019 – Suffolk Comparisons (latest available data)

<i>Target - Ipswich rank on indices of multiple of deprivation 2019, Suffolk comparisons</i>	
Local Authority	2019
Babergh District	212
West Suffolk (formally Forest Heath District)	176
Ipswich Borough	71
Mid Suffolk District	229
West Suffolk (formally St. Edmundsbury District)	176
East Suffolk (formally Suffolk Coastal District and Waveney District)	158

The Table above shows that Ipswich has a much higher level of deprivation than its neighbouring local authorities (the lower the number, the higher the level of deprivation).

Appendix 11 – Objective 11:

A Safe and Cohesive Town

Objective:

To improve air quality and create a safer, greener more cohesive town.

Target:

To tie in with Police targets relating to reducing crime levels by 2031.

To achieve a 75% reduction in the number of air quality exceedances recorded annually in Ipswich by 2031.*

An exceedance is defined as a diffusion tube monitoring report that exceeds the annual mean objective of 40 $\mu\text{g}/\text{m}^3$, once bias adjustment has been accounted for:

** At the beginning of the plan period 2011, Ipswich recorded 27 air quality exceedances after the bias adjustment.

Air Quality

The following information is taken from the Ipswich Borough Council June 2021 [Air Quality Annual Status Report \(ASR\)](#). Once bias and distance corrected the nitrogen dioxide diffusion tube data for 2020 shows that the national air quality objective for mean annual NO₂ concentrations was not exceeded at any of Ipswich Borough Council's 88 monitoring locations. However, three sites recorded concentrations within 10% of the annual mean NO₂ objective level. These sites were located within AQMAs 2 and 5.

In November 2020 Ipswich Borough Council published a [Detailed Assessment of Air Quality](#). Monitoring data indicated that there was an area outside AQMA 3 where the annual mean nitrogen dioxide (NO₂) objective level was being exceeded. In addition, there was an area within AQMA 1 that, for several years, had not exceeded the annual mean objective level. Furthermore, once bias and distance correction had been applied, there has been no measured exceedances of the air quality objective for NO₂ concentrations over the last six years in AQMA 4. As a result of these findings the detailed assessment recommended the following:

- The boundary of AQMA No. 3 is amended (marginally increased);
- The boundary of AQMA No. 1 is amended (decreased); and
- AQMA No. 4 is revoked.

Over the coming year, Ipswich Borough Council's principal air quality priority is to continue to work towards implementing the measures in the recently developed and adopted Air Quality Action Plan (AQAP).

Most recently actions to improve air quality in Ipswich Borough have included:

- In December 2021 Ipswich Borough Council adopted the Low Emissions Supplementary Planning Document (SPD). The SPD provides guidance to applicants as to how the Council expects air quality to be addressed through planning applications for sites within Ipswich Borough and will ensure that the approach to car parking provision within developments in central Ipswich supports sustainable travel choices, to help manage congestion and associated emissions.
- Local Authorities across Suffolk have been working with Suffolk County Council's Transport and Public Health colleagues to prepare an 'Air Quality Profile' report for

Suffolk. The report aims to increase understanding of the public health impact of poor air quality on health in Suffolk and to act as a catalyst for further action by local authorities, businesses, communities and individuals to improve air quality⁸;

- The Council has taken part in a number of air quality initiatives including Clean Air Day, which involved six primary schools, one nursery and a community centre for 2021. Three anti-idling events took place at primary schools and a community centre.
- The Council now have 19 electric cars and 20 small electric vans within the fleet, replacing a proportion of the older diesel vehicles. In addition, the larger vehicle fleet now includes seven pickups, sixteen tippers, ten refuse collection vehicles, one glass collection vehicle, one road sweeper, and one tail lift vehicle, all of which are Euroclass VI standard. The Council also provides free to use public electric vehicle charging points in a number of car park locations (Crown Car Park x28, Upper Orwell Street North Car Park x2, Elm Street x2). A further 149 points are proposed at Portman Road Car Park with capacity for 298 EV charging spaces.
- The Council commissioned an air quality modelling study to consider the impacts of air pollutant levels due to changes in road traffic emissions within the IBC administrative area associated with the Ipswich Local Plan Review. Modelled NO₂ concentrations without the Ipswich Local Plan Review proposals in 2026 are predicted to be approximately 33% lower than in the 2017 base year at most human receptors. By 2036, most human receptors are predicted to experience concentrations that are approximately 40% lower than in 2017. With the Ipswich Local Plan Review proposals, most human receptors in 2026 would experience concentrations that are 30% lower than in 2017 without any transport mitigation. The situation in 2036 with the Ipswich Local Plan Review proposals is very similar to that without where most human receptors experience concentrations that are approximately 40% lower than in 2017.

Recorded Crime Figures

As of 31st 2017 domestic burglary is no longer recorded and has been replaced by a new statistical category of residential burglary.

The recorded crime figures for 2021/22 were:

- Violence with injury 1537
- Sexual offences 690
- Burglary 386 (domestic burglary data no longer recorded)
- Robbery 129

The recorded crime figures for 2020/21 were:

- Violence with injury 1934
- Sexual offences 954
- Burglary 886 (domestic burglary data no longer recorded)
- Robbery 150

The recorded crime figures for 2019/20 were:

- Violence with injury 1749
- Sexual offences 759
- Burglary 603 (domestic burglary data no longer recorded)
- Robbery 272

⁸ https://www.healthysuffolk.org.uk/uploads/Suffolk_Air_Quality_Profile.pdf

The recorded crime figures for 2018/19 were:

- Violence with injury 2212
- Sexual offences 1067
- Burglary 961 (domestic burglary data no longer recorded)
- Robbery 314

The recorded crime figures for 2017/18 were:

- Violence with injury 2318
- Sexual offences 972
- Burglary 1277 (domestic burglary data no longer recorded)
- Robbery 299

Figures on the number of crimes recorded by the police are published by the Office for National Statistics. Within Suffolk, these figures can be broken down into the Community Safety Partnership areas of Ipswich, Suffolk Coastal, Waveney and Western Suffolk (comprising Babergh, Forest Heath, Mid Suffolk and St Edmundsbury). Overall, Suffolk has lower crime rates than the England average (70.7 v 83.0 recorded crimes per 1,000 residents). However, there is variation between the Community Safety Partnership areas.

Work is being undertaken to address any issues. For example, Ipswich is a priority Borough for support in relation to gang and serious youth violence and is a Home Office Ending Gang and Youth Violence area. The Council is continuing to working with local police and community partners to ensure that appropriate opportunities to design out crime have been taken prior to the commencement of any project and as part of the on-going management of any open spaces, sport or recreational facilities.

Creation of a Cohesive Town

Ipswich Town Centre has been awarded the Purple Flag accreditation recognising excellence in the management of the town centre at night. Ipswich has been accredited since 2012. Entertainment areas that achieve the standard are those that offer a better night out to visitors.

The 2022 Ipswich Local Plan includes a new Policy (DM29) which will encourage and support the sustainable growth of Ipswich’s evening and nighttime uses including the arts, culture and entertainment uses that can appeal to a wide cross-section of the population and a variety of age groups. This will be further reported on in the 2022/2023 AMR.

Table 49: Totals of All Events Including One-Off Annual Events

Indicator 1 - Totals of all events including one-off annual events.							
	2015-16	2016-17	2017-18	2018 - 19	2019-20	2020 - 21	2021 - 22
IP-Art (all events)	45,000	49,000	40,000	-	-	-	-
Music Day		21,000	23,000	22,000	24,000	-	-
Maritime Ipswich (Summertime Ipswich as of 2021)	40,000	65,000	65,000	65,000	55,000	-	24000
Great East Run****	2,000	3,000	N/A	3,000	4,000	-	-

Skyride	7,000	0	N/A	-	-	-	-
Speciality Markets	5,000** *	0	6,000	55,000	62,000	-	-
Other one-off events	35,200	60,000	56,000	71,100	261,870	-	24,012
Total	134,200	198,000	190,000	216,100	406,870	0	48,012

Table 50: Organised Visitor Groups to Ipswich Museum, Galleries and Christchurch Mansion

<i>Indicator 2 - Visitors to Ipswich museums, galleries and Christchurch mansion as individuals and as part of organised groups (including schools)</i>						
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/ 22
Ipswich Museum & Art Gallery	51,782	59,109	59,679	73,266	0	45,904
Christchurch Mansion	40,600	46,549	62,839	83,420	0	40,518
Total	92,382	105,658	122,518	156,686	0	86,422

Table 51: Total Tickets Issues/ Visitors

	<i>Regent Theatre</i>	<i>Corn Exchange</i>	<i>Total</i>
2016/17	137,711	17,945	155,656
2017/18	166,494		166,494
2018/19	157,603	154,590	172,361
2019/20	14,758	26,050	180,640
2020/21	0	0	0
2021/22	100,125	12,315	112,440

Table 52: Crime Figures Recorded

<i>Target – Crimes Recorded figures in comparison to averages over past three years*</i>				
	Violence with Injury	Serious sexual offences	Domestic burglary**	Robbery
2011 - 2012	1,349	199	1,232	203
2012 - 2013	1,185	170	1,233	154
2013 - 2014	1,020	141	895	109
2014 - 2015	1,782	187	231	59
2015 - 2016	1,452	194	221	68
2016 - 2017	1,530	228	454	128
	Violence with injury	Sexual offences	Burglary	Robbery
2017 - 2018	2318	972	1277	299
2018 - 2019	2212	1067	961	314
2019 - 2020	1749	759	603	272
2020 - 2021	1934	954	886	150
2021 - 2022	1537	690	386	129

** As of 31st 2017 domestic burglary is no longer recorded and has been replaced by a new statistical category of burglary.

Appendix 12 – Objective 12: Ipswich Policy Area

Objective:

To work with other local authorities in the Ipswich Strategic Planning Area (ISPA) and with community partners to ensure a co-ordinated approach to planning and development.

Target:

To achieve effective cross boundary working on housing, strategic greenspace and employment site provision.

Indicator 1 - Joint working taking place through ISPA Board (or equivalent forum)

The Localism Act 2011 requires planning authorities to engage constructively, actively and on an ongoing basis with other prescribed bodies in relation to strategic cross-boundary planning matters.

The Ipswich Strategic Planning Area covers the geographic areas of Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council and the former Suffolk Coastal District area of East Suffolk Council (the Ipswich Housing Market Area and Ipswich Functional Economic Area). The authorities within this area have a long-established history of working together on cross-boundary planning matters, including through the former Ipswich Policy Area Board.

The ISPA Board, which evolved from the Ipswich Policy Area Board, comprises a Councillor representative from each of these authorities and from Suffolk County Council. The [Terms of Reference](#) for the Board were produced in March 2018 and revised in July 2019, and identify the function of the Board as being:

- To provide a forum in which the five local authorities can work together to develop, promote and deliver their vision for the Ipswich Strategic Planning Area, recognising Ipswich and neighbouring communities as a major economic growth area within the Greater Ipswich sub region, County of Suffolk and New Anglia Local Enterprise Partnership area.
- To enable them to co-operate as local planning authorities on the preparation and monitoring of their Local Plans and share relevant evidence and intelligence
- To provide a mechanism to ensure that all partners and stakeholders work together to deliver the housing and employment growth requirements for the Ipswich Strategic Planning Area and coordinate the delivery of the necessary infrastructure – including transport, education, skills, power, green infrastructure, flood and coastal defences.
To produce and facilitate agreement, and keep under review as necessary, Statement(s) of Common Ground in relation to the above.

The local planning authorities within the ISPA are committed to co-operate on the preparation and monitoring of their Local Plans and have subsequently been working together on the production of evidence and the identification of appropriate outcomes to address cross boundary planning matters.

As advocated by the National Planning Policy Framework, this work has been documented through the production of a Statement of Common Ground.

The [Statement of Common Ground](#) has been updated and evolved to respond to the progression of

the production of local plans, the production and updating of evidence and changes in national policy and guidance. The Statement of Common Ground has been updated and published as follows during the 2020/21 monitoring period:

- Statement of Common Ground Version 7 – March 2021: signed and published alongside submission of the Babergh and Mid Suffolk Joint Local Plan (under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

Target - To achieve effective cross boundary working on housing, strategic greenspace and employment site provision

Much of the work on joint evidence to inform the local plans was undertaken on behalf of the Ipswich Strategic Planning Area (ISPA) authorities prior to the 20210/22 monitoring period and is documented in the ISPA Statement of Common Ground. During the monitoring period the Councils have co-operated further on the following:

- ISPA Transport Mitigation Strategy and Implementation Plan (ongoing);
- Implementation of the Suffolk Coast RAMS (Recreational Disturbance Avoidance and Mitigation Strategy).

Appendix 13 – Monitoring against the Sustainability Appraisal

Table 54: SEA Objectives and Indicators

SEA Objective	SEA Indicator	SEA Sub-Indicator	AMR reference (see Chapter 3)
ET1. To improve water and air quality	ET1a. Air and water quality	Water quality in rivers	See Objective 2 and Objective 6
		Ground water quality	
		No. of days of air pollution	
		No. of Air Quality Management Area (QMA) and dwellings affected	
		Achievement of Emission Limit Values	
ET2. To conserve soil resources and quality	ET2a. Area of contaminated land returned to beneficial use		See Objective 3
	ET2b. Development of brownfield land	(See ET10a)	
	ET2c. Density of new development	Density figures	
ET3. To reduce waste	ET3a. Tonnage of household waste produced and recycled	Percentage of household (and municipal) waste recycled	See Objective 1
ET4. To reduce the effects of traffic on the environment	ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes of transport	Green travel plans submitted with major applications	See Objective 6
		Percentage of journeys to work undertaken by sustainable modes	
		Percentage of children travelling to school by sustainable modes	
		Car parking standards (compliance with PPG13 standards)	
		Proportion of major new developments that provide a mix of uses	
ET5. To improve access to key services for all sectors of the population	ET5a. Proportion of new developments with access to key services by walking, cycling and public transport		See Objective 4
ET6. To reduce contributions to climate change	ET6a. Level of energy efficiency in homes and energy consumption	Level of per capita consumption of electricity	See Objective 1
		Level of energy efficiency in homes	
		Percentage of energy needs in new developments met by renewable energy	
ET7. To reduce vulnerability to climatic events and increasing sea levels	ET7a. Developments at risk of flooding	No. of planning applications approved where EA have objected on flood risk grounds	See Objective 7
		No. of properties at risk of flooding that are within 1,000 year return period flood risk area (EA)	See Objective 8
	ET7b. Effects of heat	Provision of shading and greening (i.e. avoiding the heat island effect)	
		proofing homes against hotter temperatures	
ET8. To conserve and enhance biodiversity and geodiversity, including Favourable conditions on SSSIs, SPAs and SACs	ET8a. Area (ha) of woodland		See Objective 8
	ET8b. Changes in extant of Natura 2000 sites		
	ET8c. Extent and condition of key habitats for which BAPS have been established		
ET9. To conserve and, where appropriate, enhance areas of historical importance	ET9a. Risks to listed buildings, conservation areas and historic parks and gardens	No. of listed buildings and buildings at risk	See Objective 8
		Area (ha) of historic parks and gardens	
		No. and area (ha) of Conservation Area and Article 4 Directions	
		No. of Conservation Appraisals completed and enhancement schemes implemented	
	ET9b. Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc)		See Objective 8
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	ET10a. Percentage / No. of new dwellings completed / committed on brownfield land	Percentage / No. of new dwellings completed on previously developed land	See Objective 3
		Percentage of existing housing commitments on previously developed land	
		No. of vacant dwellings	
	ET10b. Area (ha) of designated landscapes – Area of Outstanding Natural Beauty (AONB)		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	EA11a. Percentage of SSSIs, SPAs and SACs in good condition		See Objective 8
HW1. To improve the health of those in most need	HW1a. Proportion of population with access to hospital / GP / Dentist		See Objective 3
	HW1b. Proportion of journeys to work by foot or by bicycle		See Objective 6
	HW1c. How children travel to school (QOL / BVPI)		See Objective 6
HW2. To improve the quality of life where people live and encourage community participation	HW2a. Play and open space quality, quantity and accessibility	Change in existing outdoor play space provision	See Objective 5
		Change in existing provision of children's play space	
		Change in provision of open space	

SEA Objective	SEA Indicator	SEA Sub-Indicator	AMR reference (see Chapter 3)
ER1. To reduce poverty and social exclusion	ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country		See Objective 10
	ER1b. Provision of childcare	No. of neighbourhood nurseries available	Data not available
		No. of childcare places available	Data not available
ER2. To offer everybody the opportunity for rewarding and satisfying employment	ER2a. Data relating to employment and economic activity in the area Average Earnings	Unemployment rate	See Objective 10
		Long term unemployment (NOMIS)	
ER3. To help meet the housing requirements for the whole community	ER3a. Data relating to housing including stock type, land availability and affordability	Homelessness	See Objective 3
		Housing stock (SSAG)	
		Housing land availability	
		Affordable housing	
		Housing types and sizes (links to ET2c: housing density)	
		Average property price to income ratio	
	ER3b. Identify sites to meet RSS housing requirements	No. of unfit houses per 1,000 dwellings (BVPI)	
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	ER4a. Planning consents for employment uses and take up of employment floorspace	Take up of employment floorspace	See Objective 3
		Employment permissions and completions	
		Planning consents for B1, B2 and B8 uses	
	ER4b. Data relating to businesses and employment issues	No. / Percentage employed by employment division	See Objective 3
		No. / Percentage businesses by main industry type	
ER5. To revitalise town centre		No. / Percentage employed by size (no. of employees)	See Objective 3
		No. / Percentage employed by industry type in key sectors	
		Comparative industrial / office rental costs	
ER6. To encourage efficient patterns of movement in support of economic growth	ER6a. No. / Percentage of people working from home	Percentage of town centre units within A1 uses	See Objective 3
		No. / Percentage of vacant retail units in town centre	
		Percentage of town centre where 'liveability' has been enhanced through public realm work	
ER7. To encourage and accommodate both indigenous and inward investment	ER6a. No. / Percentage of people working from home	Borough statistics	See Objective 6
	See ET4a	Live work units provided on major sites	
	ER7a. Business start-ups and closures		
ER7. To encourage and accommodate both indigenous and inward investment	ER7b. No. of business enquiries to SDA / LA / SCC by types and size of site		See Objective 3
	ER7c. Employment and accessibility, permissions and allocations	Employment land availability	
		Employment permissions and allocations	
CL1. To maintain and improve access to education and skills in the population overall	CL1a. GCSE attainment levels (Grades A* - C)	% of year 11 pupils gaining 5+ A-C grades at GCSE	See Objective 10
	CL1b. Proportion of the population with no qualifications	Proportion of the population with no qualifications	
CD1. To minimise potential opportunities for and anti-social activity	CD1a. Recorded crime per 1,000 population		See Objective 11
	CD1b. Burglary rate	Burglary rate per 1000 population (SDA)	
	CD1c. Fear of crime (QOL, Suffolk Speaks, British Crime Survey)	% of respondents who feel safe in the place where they live	
		% of respondents who feel their area is safe within low levels of crime and disorder	

SEA Objective	SEA Indicator	SEA Sub-Indicator	AMR reference (see Chapter 3)
	CD1d. Number of noise complaints (Environmental Health Departments Statistics)	No. of domestic noise complaints	

WEB LINKS

GENERAL

The full Housing White Paper can be downloaded here: <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>

OBJECTIVE 1

Design Standards and Sustainable homes target data is monitored through internal sources only, and is not available other than in this document when it is published.

OBJECTIVE 2

Local Authority CO2 emissions estimates

<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

Ipswich Borough Council Air Quality Management

<https://www.ipswich.gov.uk/airqualitymanagement>

Electricity consumption

<https://www.gov.uk/government/statistical-data-sets/regional-and-local-authority-electricity-consumption-statistics-2005-to-2011>

Ipswich Low Emissions SPD

<https://www.ipswich.gov.uk/content/draft-low-emissions-supplementary-planning-document-spd>

OBJECTIVE 3

Ipswich Strategic Housing and Economic Land Availability Assessment Jan 2020

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

Ipswich Housing Delivery Action Plan

<https://www.ipswich.gov.uk/content/draft-housing-delivery-action-plan>

Ipswich Self-build and Custom Build Register

[final ipswich borough council self build and custom build register monitoring report 2021-2022.pdf](https://www.ipswich.gov.uk/sites/default/files/ipswich_self_build_and_custom_build_register_monitoring_report_2021-2022.pdf)

Ipswich Employment Land Availability Report

<https://www.ipswich.gov.uk/content/land-availability>

East of England Forecasting Model

<http://cambridgeshireinsight.org.uk/EEFM>

OBJECTIVE 4

N/A

OBJECTIVE 5

Green Flag Awards

<https://www.ipswich.gov.uk/content/13-green-flags-%E2%80%93-that%E2%80%99s-lucky-ipswich>

Equipped play area strategy

<https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/Draft-Play-Strategy-2014-2021.pdf>

Ipswich Towns Fund

<https://www.ipswich.gov.uk/about-the-towns-fund>

OBJECTIVE 6

Ipswich Cycling Strategy SPD

<https://www.ipswich.gov.uk/content/cycling-strategy-spd-0>

Travel to Work Survey Report 2021

<https://thewaytogosuffolk.org.uk/wp-content/uploads/2022/01/2022-01-20-Travel-to-Work-Survey-2021.pdf>

OBJECTIVE 7

Data on local application of Environment Agency advice.

Draft Ipswich Flood Risk SPD

<https://www.ipswich.gov.uk/content/development-and-flood-risk-spd>

OBJECTIVE 8

Data on protected habitats and buildings at risk is monitored through internal sources only, and is not available other than in this document when it is published.

OBJECTIVE 9

[School workforce in England](#)

<https://explore-education-statistics.service.gov.uk/find-statistics/school-workforce-in-england#explore-data-and-files>

OBJECTIVE 10

Unemployment Statistics

<https://www.nomisweb.co.uk/>

Department of Communities and Local Government - English indices of deprivation

<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

OBJECTIVE 11

Ipswich Borough Council Air Quality Annual Status Reports

<https://www.ipswich.gov.uk/airqualitymanagement>

Purple Flag Award

<https://www.ipswich.gov.uk/content/purple-flag>

PCC or Suffolk Police websites

<http://www.suffolk-pcc.gov.uk/>

Office of National Statistics, Crime in England and Wales: year –ending Mar 2017

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice>

OBJECTIVE 12

STATUTORY INDICATORS

Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012

<http://www.legislation.gov.uk/ukxi/2012/767/regulation/34/made>

GLOSSARY

AMR	Authority Monitoring Report	A report prepared annually to monitor progress with preparing the Local Plan and the extent to which planning policies are delivering positive outcomes and other strategic Council functions of relevance are performing.
CO ₂	Carbon Dioxide	CO ₂ or Carbon Emissions into the atmosphere contribute to global warming and as a result climate Change. CO ₂ emissions are recorded in tonnes of carbon emissions for each member of the population or <i>(t) per capita</i> .
CIL	Community Infrastructure Levy	Local Authorities are empowered to set a charge for most developments, through a simple formula related to the scale and type of a scheme. The proceeds of the levy must be spent on local and sub-regional infrastructure to support the development of the area. Currently the Council does not have CIL in place.
	Core Strategy and Policies DPD	The Core Strategy and Policies DPD forms part of the Local Plan, and is formed of a Strategic Vision, Spatial Strategy, and development management policies.
CfSH	Code for Sustainable Homes	National standard for key elements of design and construction, which affect the sustainability of a new home. It was used by home designers and builders as a guide to development until 2015 when it was abolished.
	Corporate Plan	The Council's plan which sets out the strategic objectives of the Council as a whole.
DPH	Density or dwellings per hectare	A term relating to the amount of new housing in a specific area. E.g. High density refers to 90 - 110 dwellings per hectare or DPH. Medium density refers to new housing of at least 40 dph, and low density refers to new housing under 40 dph.
DPD	Development Plan Document	A local development document in the Local Plan which forms part of the statutory development plan. The Core Strategy and Policies is a DPD
FRA	Flood Risk Assessment	Carried out by, or on behalf of, a developer to assess the risk to a development site and to demonstrate how flood risk from all sources of flooding to the development itself and flood risk to others will be managed now, and taking climate change into account.
FTE	Full Time Equivalent	The method in capturing those in employment or education who are either in full-time or part-time, as a single figure.

	Ipswich Northern Fringe	An area to the North of Ipswich located between Henley Road and Tuddenham Road that is identified for the delivery of housing and associated infrastructure. Now known as the Ipswich Garden Suburb.
GIS	Geographical Information System	A system designed to capture, store, manipulate, analyse, manage, and present all types of geographical data
ISPA	Ipswich Strategic Policy Area	An area extending across the tight administrative boundary of Ipswich into adjacent Local Authorities, where a coordinated approach to strategic planning for housing, employment and infrastructure takes place.
KS2, KS4, KS5	Key Stage 2, 4 or 5	Place in the education system based on key stages. KS2 represents the year prior to going to middle school. KS4 represents the year of GCSE examinations. KS5 represents 16 - 18 years education most often A level examinations.
LDD	Local Development Document	A general term for a document in the Local Plan. It includes the Core Strategy and Policies and other development plan documents, and supplementary planning documents.
	Modal Shift	Movement in the use of preferential method of transport from one use (such as private car) to another (such as public transport).
NPPF	National Planning Policy Framework	Central Government planning policy laid down in a written framework, with the main aim being to achieve sustainable development.
PDL	Previously Developed Land	Land that is or was occupied by a permanent structure including the boundary of the developed land and any associated fixed surface infrastructure.
SEA	Strategic Environmental Assessment	A strategic environment assessment is a generic term used to describe environmental assessment as applied to policies, plans and programmes. The European SEA directive (2001/42/EC) requires a formal environmental assessment of certain plans and programmes, including those in the field of planning and land use.
SHELAA	Strategic Housing Employment Land Availability Assessment	The Strategic Housing and Economic Land Availability Assessment is a key component of the evidence base underpinning the Local Plan, by identifying a list of sites which may be suitable and available for housing and employment development.
	Soundness Tests	In the process of examining a planning document an inspector assesses whether the document is positively prepared, justified, effective and consistent with national policy.

SPD	Supplementary Planning Document	A local development document that provides further guidance on policies in the development plan documents. They do not have development plan status.
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