

## Ipswich Local Plan Review: IBC Actions from PINS Action list Combined – 22 December 2020

This document combines Ipswich Borough Council’s actions prepared for 22 December 2020 in response to the PINS Action List of tasks arising from the examination hearings. It only includes actions that are short in terms of document length to avoid sending multiple documents. It specifically covers the following actions:

Action	Page No.
MM to clarify the uses allowed on IP054b following changes to UCO.	3
Note on IP067a on frequency and number of complaints received by IBC EH and AWS from occupiers of properties surrounding Cliff Quay WRC, including properties within and beyond the 30u/m3 contour – to be agreed between IBC and AWS.	8
MMs relevant policies and Site Sheet to allocate 0.8 ha of Site IP010a Co-op Depot, Felixstowe Road for primary school extension	16
IP014 MM needed in respect of number of dwellings anticipated on the site	20
Note on evidence to justify figure of 15% of energy from decentralised or renewable or low carbon sources.	22
Note to explain parking strategy in relation modal shift strategy, and justification for allocation of 4 sites for MSCPs in Policy SP17.	23

The remaining actions for 22 December 2020 have been dealt with by way of the following separate PDF documents that have also been sent to PINS:

Action	Document
Site IP150e note to explain how Council brings their sites forward as landowner, including the Council’s capacity for doing this	“IP150e Note 22_12_20”
MM to Policy DM13 to reflect tests in paragraphs 195 & 196 of NPPF for considering substantial and less than substantial harm to designated heritage assets.	“MM Policy DM13 22_12_20”
MM to Policy DM13 to remove reference to the weighing harm against ‘public benefits’ for non-designated assts, in line with paragraph 197 of NPPF.	“MM Policy DM13 22_12_20”
MM to reference removal of pd rights in Conservation Areas, where this is justified.	“MM Policy DM13 22_12_20”
Consider MM to Policy DM1 - Sustainable Construction in respect of fire safety.	“MM Policy DM12 22_12_20”

MM to criterion i of Policy DM15 to ensure tall building proposals preserve views within the town centre Conservation Area as well as its setting.	"MM Policy DM15 22_12_20"
MM to Policy DM17 MM to cross reference Policy DM8 regarding protection of semi-natural habitat.	"MM Policy DM17 22_12_20"
MMs to Policy DM21 and supporting text to: - include thresholds for Travel Plans in the policy as in Policy SCLP7.1 of the Suffolk Coastal Local Plan; - reference SPD on Parking, Low Emissions and Travel Plans as for guidance rather than policy requirements; - Simplify criterion b of policy in relation to the mitigation of air quality impacts.	"MM Policy DM21 22_12_20"
MM to Policy DM22 to 'have regard to' rather than comply with parking standards in SPD, as in Suffolk Coastal Local Plan.	"MM Policy DM22 22_12_20"
MM to para 9.3.1 in support of Policy DM3 to incorporate reference to 'working towards achieving compliance with air quality limit values'.	"MM Para 9.3.1 22_12_20"
MM to Policy CS16 criterion a to clarify, with reference to Policy DM6, how contributions to the provision of open space from new developments can assist in addressing existing deficits of open space in an area.	"MM Policy CS16 22_12_20"
MMs to Policy DM10 and supporting text to clarify status of river corridors as either 'blue' or 'green' and to clarify policy on development within the 10m buffer zone in paragraph 9.10.6.	"MM Policy DM10 22_12_20"
IP054b UCO modifications (glossary only)	"MM glossary 22_12_20"
MM to Policy SP16 clarifying potential route for Wet Dock Crossing is on IP-One Area Inset Policies Map (not on PINS action list but IBC agreed to do verbally at hearings).	"MM Policy SP16 22_12_20"

IBC's response to the request for Main Modifications to clarify the uses allowed on IP054b following changes to UCO.

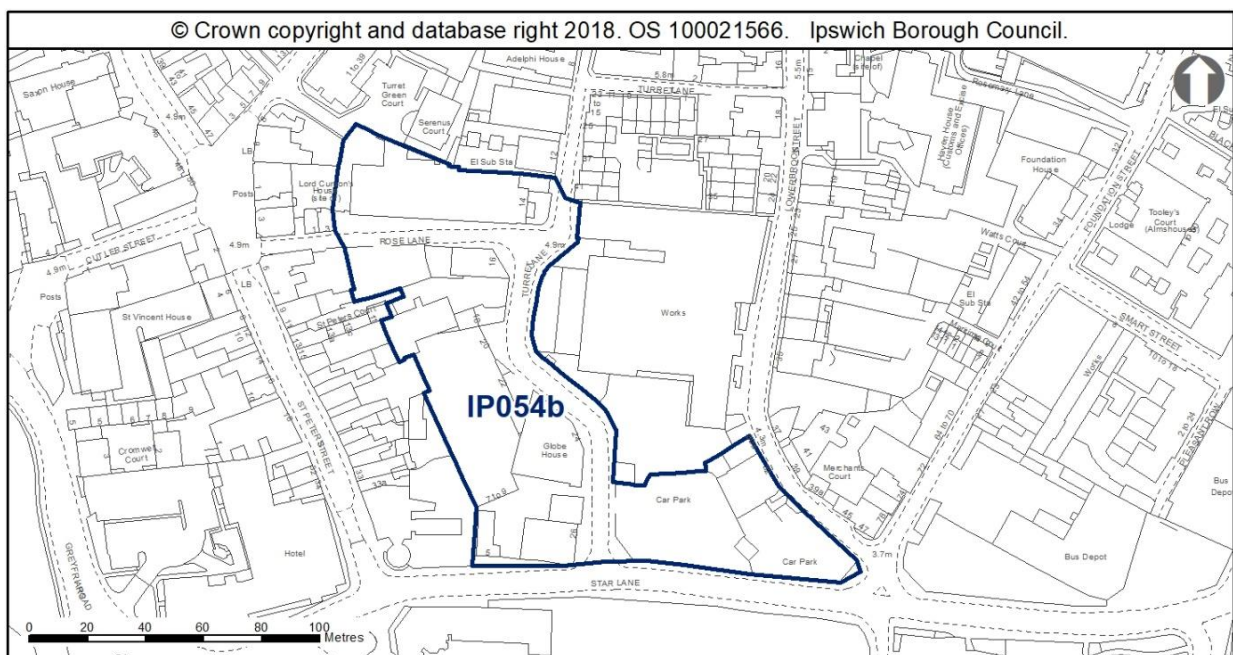
## Introduction

The Council has discussed these modifications with Bidwells (on behalf of the landowner). Whilst Bidwells are satisfied with the principle of Policy DM32 being referenced as the indicative capacity for any retail development, they wish to reserve the right to review this position. This is to take account of any suggested modifications to Policy DM32 that may be carried out by the Council in response to the Inspectors Letter regarding Matter 5 (retail). The Council has not been set a deadline for the Matter 5 (retail) work at this time.

## Modification to Site Sheet IP054b.

**Site ref: IP054b (UC057) Land between Old Cattle Market & Star Lane**

**Site area: 1.08ha**



## **Allocation Policies SP2**

Use(s)		Indicative capacity
Primary	Housing	40 (60dph on 60% of site)
Secondary	<u>Use Class E development</u> retail	<del>Some individual units up to 200sqm</del> — subject to Core Strategy policy DM32 ( <u>retail in accordance with Policy DM32</u> )

	Electricity sub-station	
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### **Adopted Plan 2017**

Larger site allocated incorporating the former print works. As above but residential 28 dwellings and possible public car parking included.

### **Current use**

To the west of Turret Lane, various employment uses, car parking. To the east of Turret Lane, car parking.

### **Development constraints / issues**

The site is within or close to an Air Quality Management Area and part within a flood zone at the southern end of the site. There are TPOs on site or nearby (an application for Tree Works may be needed). The site is also within an area of archaeological importance, partly within the Central Conservation Area, contains a scheduled monument and two grade II listed buildings (30A and 32 Lower Brook Street). The site is flanked by the rest of the Central conservation area and several listed buildings, with two grade II\* churches to the south.

Whilst much of this area is not located in the Conservation Area, the allocation site nonetheless is located in the setting of the Central Conservation Area, responds to several historic ranges and outbuildings along St Peters Street, and located on land of archaeological significance. The application site is thus in a historically significant location, contributing to the setting of heritage assets, as well as being in a prominent position in the historic north/south route onto Turret Lane.

Development should look to respect the domestic scale of existing architecture along St Peters Street, and should allow breathing space between these listed buildings and new development. The winding nature of Turret Lane should be incorporated into development proposals, and should reveal the design of the scheme as users turn the corner of Turret Lane, and be of a high quality design which would help link the town centre and the waterfront.

The corner of Star Lane and Turret Lane should look to introduce a landmark building to provide interest to the street scene. The adjacent cylindrical building at the junction of St Peters Street and Star Lane serves as an example that a landmark building need not necessarily be tall or overscaled.

Development should introduce a frontage to Star Lane, although must have regard for the highly graded listed buildings to the south, and incorporate the trees which are covered by

TPOs in the eastern corner of the allocation site at Star Lane. This area could perhaps be a pocket of open/amenity space, which would allow for a break in new development and the listed buildings on Lower Brook Street.

If retail units are to be incorporated into the development of this allocation site, then perhaps focussing these along Rose Lane would be most appropriate, to continue the commercial character of St Peter's Street.

Redevelopment will be dependent on the intentions of existing businesses.

Development principles for the Merchant Quarter, within which the site is located, are set out in Chapter 6 of the Site Allocations and Policies development plan document (see 'Opportunity Area B'). They include, for example, a layout to relate to the historic street pattern and enhanced pedestrian linkage between the town centre and the Waterfront. It is a key principle for the development of this site that connectivity is built in to ensure linkages with surrounding development.

There is a need to protect land for an extension to the electricity sub-station or new provision within the site. The route of Turret Lane should be protected in development proposals.

This site lies within the area of archaeological importance (IPS 413) and contains a scheduled monument (split over two separate areas) relating to the Anglo-Saxon and medieval town of Ipswich (List Entry No 1005987). Parts of the area have been investigated (IPS 214), IPS 369, and IPS 574). The latter found a wood-lined well with an assemblage of boar tusks, demonstrating good potential for the survival of wet and well preserved organic deposits. Scheduled Monument Consent (SMC) is a legal requirement for any development which might affect a monument either above or below ground level. Historic England administers the SMC application process on behalf of the Secretary of State for Digital, Culture, Media and Sport and should be consulted at the earliest opportunity to discuss the nature of the development. SMC is a separate process from the planning system.

There is also a potential for nationally important archaeological remains outside the scheduled areas. Detailed pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required in order to agree the principle of development and inform design (e.g. to allow preservation in-situ of deposits or appropriate programmes of work). Where development is accepted in principle, archaeological remains will be complex and important, and mitigation could involve significant costs and timescales.

A transport assessment and travel plan will be required.

Surface water flooding local to site - will need to be considered at planning application stage. See Appendix 1 of the Ipswich SFRA.

Although this site is currently of low wildlife value, there is a potential risk that buildings could support bats and consequently an internal inspection by a suitably qualified ecologist is recommended, which will also encompass nesting birds. To achieve biodiversity net gain, the recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development, unless other means of biodiversity enhancement are appropriate.

### Modification to Table 1 – Policy SP2

## Policy SP2 Land Allocated for Housing

- 4.5 Through Final Draft Core Strategy policy CS7 ‘The Amount of Housing Required’, the Council commits to allocating land to provide at least an additional 6,100 dwellings net to 2036. The following policy provides the detailed site allocations to deliver a proportion of that housing requirement.

**Policy SP2 Land allocated for housing**

**The following sites are allocated for residential development, or part residential development within mixed use developments as indicated in Table 1. Development will take into account appropriately the constraints identified through the site sheets contained in Appendix 3 of the plan.**

**Table 1 Land allocated for residential use or residential-led mixed use**

Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
IP054 b	Land between Old Cattle Market and Star Lane The site now excludes the former Archant site to the east of Turret Lane and is allocated primarily for residential use alongside <del>retail and leisure</del> <u>Use Class E development (retail in accordance with Policy DM32)</u> and an extended or	1.08 (60%)	40	60dph. High density area (DM23a) but a mix of flats and town houses would fit the character of locality. Hence density higher than medium range.	L

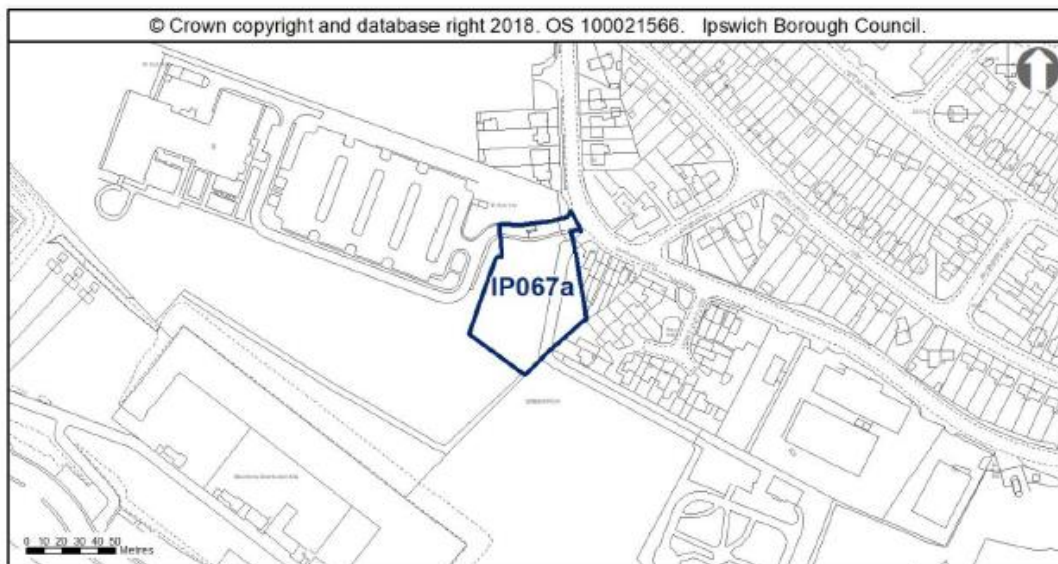
Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
	replacement electricity sub-station.				

Note on IP067a on frequency and number of complaints received by IBC EH and AWS from occupiers of properties surrounding Cliff Quay WRC, including properties within and beyond the 30u/m3 contour – to be agreed between IBC and AWS.

## **Introduction**

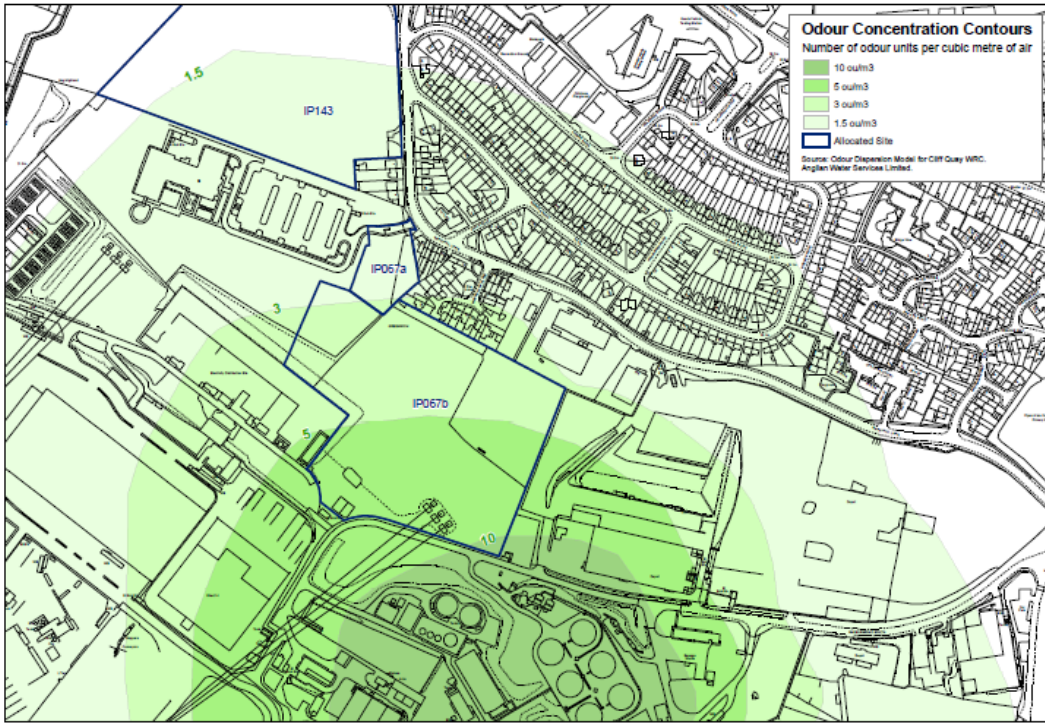
Please note that this document is split into two sections. The first section is Ipswich Borough Council's record of complaints and the second section is Anglian Water's record of complaints. These have been prepared separately but combined into one document for ease of reference.

## **Ipswich Borough Council Response**



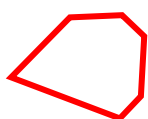
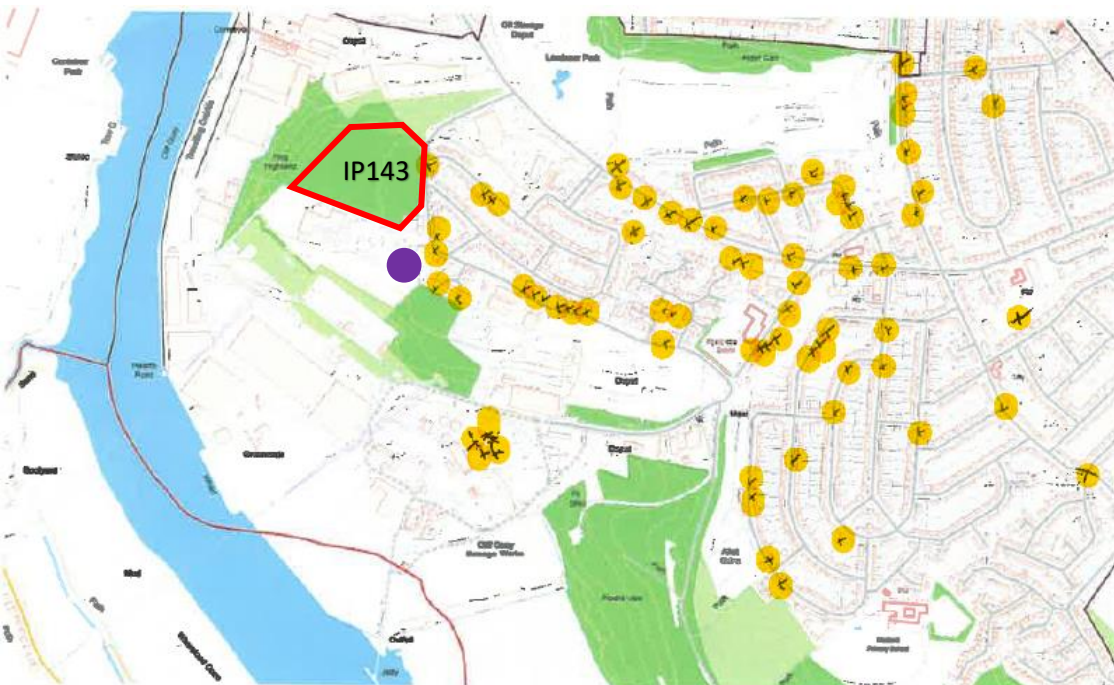
Plan 1. Site ref IP067a





Plan 2 - Allocations IP067a, IP067b, and IP143 all plotted on the odour contour map submitted by Anglian Water as part of their matter 6 statement.

The following data was provided by IBC Environmental Protection team in response to the outline planning application at site IP143 reference IP/17/00769/OUT



= site ref IP143 subject of Outline Planning permission ref IP/17/00769/OUT located approximately 70m to the north of IP067a to which there was no objection from Anglian Water.

● = Site ref IP067a

● = complaint received between 2010 – 2017



17.00769.OUT - AW

comments.pdf = AW comments relating to IP/17/00769/OUT

At the Matter 6 hearing session held on 8<sup>th</sup> December 2020 the Planning Inspector requested that Anglian Water provide further information relating to:

- number of complaints received by Anglian Water relating to odour for Cliff Quay site; and
- actions taken to address odour and its effect on the continuous operation of the Cliff Quay site.

The purpose of this note is to provide further information on these topics to assist the Planning Inspectors examining the Ipswich Local Plan Review.

### Cliff Quay site

The Cliff Quay Water Recycling Centre is essential infrastructure to treat sewage for the current and future population of Ipswich. The ability for it to continue to operate and expand to manage the population growth set out in the Local Plan is a critical soundness issue. Cliff Quay is a strategic site which currently serves a population of 146,930 and treats sewage for the Ipswich catchment and includes a sludge treatment facility. This site is also used to treat liquid and dewatered sludge which is imported from other smaller water recycling centre sites elsewhere in our company area. It is operated on a continuous basis to serve our customers consistent with our duties under the provisions of the Water Industry Act 1991 to provide water recycling services.

The water recycling process has two inlets both of which are close to the northern boundary of the site and this is where sewage from the Ipswich catchment enters the site for treatment. It is important note that the catchment served by Cliff Quay WRC is not limited to the Ipswich city area but includes a number of other settlements.

The water recycling process begins with preliminary treatment for the removal of grit and inorganic products. This treatment phase is inherently odorous as the incoming sewage is likely to be septic and the process unavoidably involves agitated or turbulent flow condition through which odorants are released. The next treatment phase, which is also close to the northern boundary, involves primary settlement of the sewage to separate out the larger solid matter (known as primary sludge). The primary sludge is then passed to the onsite sludge treatment centre (STC), which is based on an advanced digestion plant. The STC is part of a regional sludge management programme, based on nine advanced digestion sites covering the whole Anglian Water area. The STC operation is coordinated within a complex sludge logistics chain with a critical inter-dependence between the STC sites. Although the principal elements of the STC process are contained, with odour extraction and treatment, there are many interfaces both within the STC process and between it and the host water recycling process. The STC process is also reliant on imported liquid sludge and thickened sludge from other sites. These imports and the various process interfaces are impracticable to enclose and are common sources of intermittent, short duration, isolated or fugitive emissions.

Some of the treated sludge is co-composted on site with municipal green waste, much of which occurs in open windrows.

#### Number of complaints received by Anglian Water

Based upon our records there has been 90 complaints over the last 10 years reported to Anglian Water from 2010 to 2020. With a complaint raised as recently as November 2020. Further details of which are set out in the Appendix to this note.

It is important to note that number of complaints have been received at a greater distance than the 3OU<sub>E</sub> /m<sup>3</sup> contour as shown on the output from our Odour Dispersion Modelling included in our written statement for Matter 6 session. With a significant number being received for properties within a 300m to 400m range of the Cliff Quay site.

Although dispersion modelling can reliably represent prevailing, steady-state emissions from the static and permanent process elements, it is less able to account for variability of process interfaces. Even very short process interruptions can produce strong odour emissions. The accuracy of model predictions to the 98<sup>th</sup> percentile allows for up to 175 hours per year of emissions greater than that predicted in the analysis and this could account for many incidents of a short duration hiatus in odour emissions.

The extent of complaints beyond the model predicted 3OU<sub>E</sub>/m<sup>3</sup> dispersion demonstrates the odour potential of intermittent and fugitive emissions from a complex treatment process such as at Cliff Quay. It has been well established that receptors to malodour are more disturbed by intermittent and variable emissions than by a constant emission. The complaints record verifies that this is the case.

As discussed at the hearing session the outputs from the modelling should be used together with the available evidence from historic complaints. We are of the view that modelling in itself cannot be relied upon to demonstrate the expected odour effect of the continuous operation of the Cliff Quay for Site IP067a.

In addition, the nature and use of the Cliff Quay site is likely to change over time due to future investment by Anglian Water to a range of drivers including but not limited to addressing additional growth as proposed by the Local Plan, ensuring compliance with environmental permits issued by the EA or making improvements for water quality and operational efficiency. An example of which would be changes to the current sewage treatment process.

As such any records of complaints are based upon the use of Cliff Quay site at the time and do not reflect any future changes that may arise from future investment by Anglian Water.

#### Actions taken to address odour issues and its effect on the operation of Cliff Quay site

Anglian Water has been in regular discussion with the Council's Environmental Health Team in respect of odour complaints from our customers with meetings being held on a monthly basis including earlier this year. Ongoing issues are being managed but the success of these measures should not justify introducing additional receptors.

Currently there is an Odour Management Plan in place to provide mitigation for odour issues reported by existing receptors in the vicinity of the Cliff Quay site. This in itself demonstrates that the works is operating with managed conditions. Adding additional receptors to the local

area are likely to only add to the complexity of management measures. The plan should seek to avoid impact as a first course of action, not rely upon a mitigation via a management plan. As such it is not intended to address any odour impacts experienced by future residents of site IP067a as outlined in the Local Plan Review as these would be new receptors. The agent of change principle applies, and it is for new development to demonstrate that any amenity impacts can be avoided or that effective mitigation can be provided as part of the development.

**Appendix – schedule of complaints received by Anglian Water (2010 to 2020) by location, distance and direction**

	Direction	Range	Total	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Pipers Vale Close	N	190	1	0	0	0	0	0	0	0	1	0	0	0
Davey Close	NE	410	1	0	0	0	0	1	0	0	0	0	0	0
Cotman Road	ENE	820	1	0	0	0	0	0	0	0	0	0	0	1
Ireland Road	NNE	400	46	0	3	1	1	2	4	6	8	6	12	3
Hossack Road	E	800	1	0	0	1	0	0	0	0	0	0	0	0
Nightingale Road	E	750	1	0	0	0	1	0	0	0	0	0	0	0
Bonnington Road	NE	520	2	0	0	1	1	0	0	0	0	0	0	0
Mersey Road	N	890	1	0	0	1	0	0	0	0	0	0	0	0
Childers Court	NE	250	9	1	0	4	0	0	0	0	0	1	1	2
Broom Crescent	NE	315	3	0	0	0	0	0	0	1	0	0	2	
Robeck Road	N	260	6	0	1	1	0	1	0	0	1	0	2	
Dereham Avenue	N	840	2	0	0	0	0	0	0	0	0	0	1	
Fletcher Road	E	380	6	0	0	2	1	1	0	0	2	0	0	0
Cliff Quay	NNW	820	1	0	0	0	1	0	0	0	0	0	0	0
Cliff Road	NNW	820	1	0	0	0	0	0	0	0	1	0	0	1
Hogarth Road	NNE	530	2	0	0	0	0	0	0	1	0	0	0	0
Raeburn Road South	N	20	6	0	1	2	1	1	0	0	0	0	1	0
			<b>90</b>	<b>1</b>	<b>5</b>	<b>13</b>	<b>6</b>	<b>6</b>	<b>4</b>	<b>8</b>	<b>13</b>	<b>7</b>	<b>19</b>	<b>7</b>

Within range (m)	
100	6
200	1
300	15
400	55
500	1
600	4
700	0
800	2
900	6
	90

By direction	
NNW	2
N	16
NNE	48
NE	15
ENE	1
E	8
	90

IBC's response to the request for main modifications to relevant policies and Site Sheet to allocate 0.8 ha of Site IP010a Co-op Depot, Felixstowe Road for primary school extension

**Policy SP2 Land Allocated for Housing**

**Table 1 Land allocated for residential use or residential-led mixed use**

Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
IP010a	Co-op Depot, Felixstowe Road Approximately <del>25%</del> <u>35%</u> of the site is safeguarded for an extension to Rosehill School.	2.22 ( <del>c.75%</del> <u>c.65%</u> )	75	<del>45dph (DM23b)</del> <u>53dph</u>	M

**Policy SP7 Land Allocated for Leisure Uses or Community Facilities**

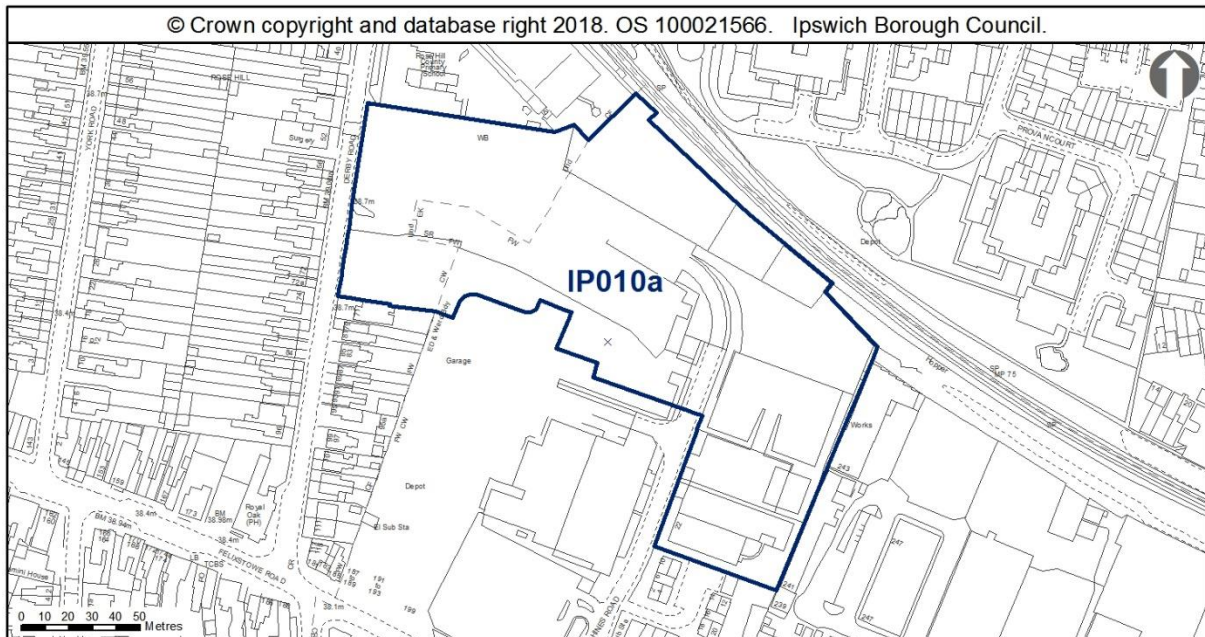
**Table 5: List of sites proposed for leisure uses or community facilities**

Site	Address	% Community facilities / leisure	Community or leisure use	Other Uses
IP010a	Co-op Depot, Felixstowe Rd As part of a residential development	<del>25%</del> <u>35%</u>	Primary school extension	Housing



**Site ref: IP010a (UC010) Co-Op Depot Felixstowe Road**

**Site area: 2.22ha**



**Allocation Policies SP2, SP7 & SP9**

Use(s)		Indicative capacity
Primary	Residential	75 ( <del>45dph</del> <u>53dph</u> on <del>75%</del> <u>65%</u> of site*)
Secondary	School extension (approximately <del>25%</del> <u>35%</u> )	<del>0.5ha</del> <u>0.8ha</u>

\* see Core Strategy policy DM23 for minimum and average densities.

**Adopted Plan 2017**

As above.

**Current use**

Vacant or part used yards, and employment premises.

**Development constraints / issues**

Expansion needed at Rose Hill School.

Possible contamination, TPO on site or nearby, noise from the railway. Design and layout would need to support the wildlife corridor function of the railway. An ecological survey

(including flora, reptiles, bats and badgers) will be needed prior to any vegetation clearance and mitigation where appropriate. To achieve biodiversity net gain, the recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development, unless other means of biodiversity enhancement are appropriate.

In terms of archaeology, this site lies close to prehistoric and Palaeolithic remains (IPS 056). Depending on the nature of ground works, a condition may be recommended for archaeological works.

A transport assessment and travel plan will be required. Land should be reserved as part of the development of either IP010a or IP010b to facilitate development of a cycle and pedestrian bridge to link the District Centre with the housing to the north of the railway.

This allocation site is accessed off Derby Road and Felixstowe Road and wraps around the north of the Rosehill Centre adjacent to the railway line. The future development of this site should, if feasible, not prohibit the adjacent allocation at IP010b from being accessed from Hines Road.

The proposed extension to Rose Hill Primary School should reflect the distinctive character of the existing school buildings onto Derby Road, a building with origins in the early 20th Century, which experienced remodelling and extensions in the middle of the century. It features various textured brickwork bonding, canted bays with moderne and art deco influences in curved elements and wide windows with a strong horizontal emphasis. The school extension should seek to respond to these architectural influences in the design and appearance of the extension, whilst also being read independently of the existing range to act as a landmark building to signify the gateway to the new development of the allocation site.

The residential development of this allocation site should respect the established grid layout of the Rosehill area, and follow the perimeter block form with active frontages facing the streets, an established characteristic of the area, as identified in the California Urban Characterisation Study SPD. Existing dwellinghouses in California are principally red brick terraces and pairs of semi-detached houses, with often a prevailing architectural feature which characterises a particular road or area, such as the position of the front door, the pattern of fenestration, the use of bay windows, which has led to some distinctive areas of development.

This varied approach to employing architectural details to create pockets of distinguishable housing should be incorporated into the development of the allocation site to ensure the design of the new development is high quality and distinctive.

Parking should be incorporated into the design proposals to encourage the public realm to contribute positively to the character and experience of the development at the allocation site.

Development of the site should consider the enhancement of pedestrian links to the school avoiding main roads in the interests of highway safety.

IBC's Response to the request to update Table 1 in Policy SP2 and the IP014 Site Sheet to reflect the correct number of dwellings and density proposed at IP014, requested by the Inspectors as a result of the discussion on Matter 3 (10<sup>th</sup> December 2020)

1.0 Policy SP2, Table 1:

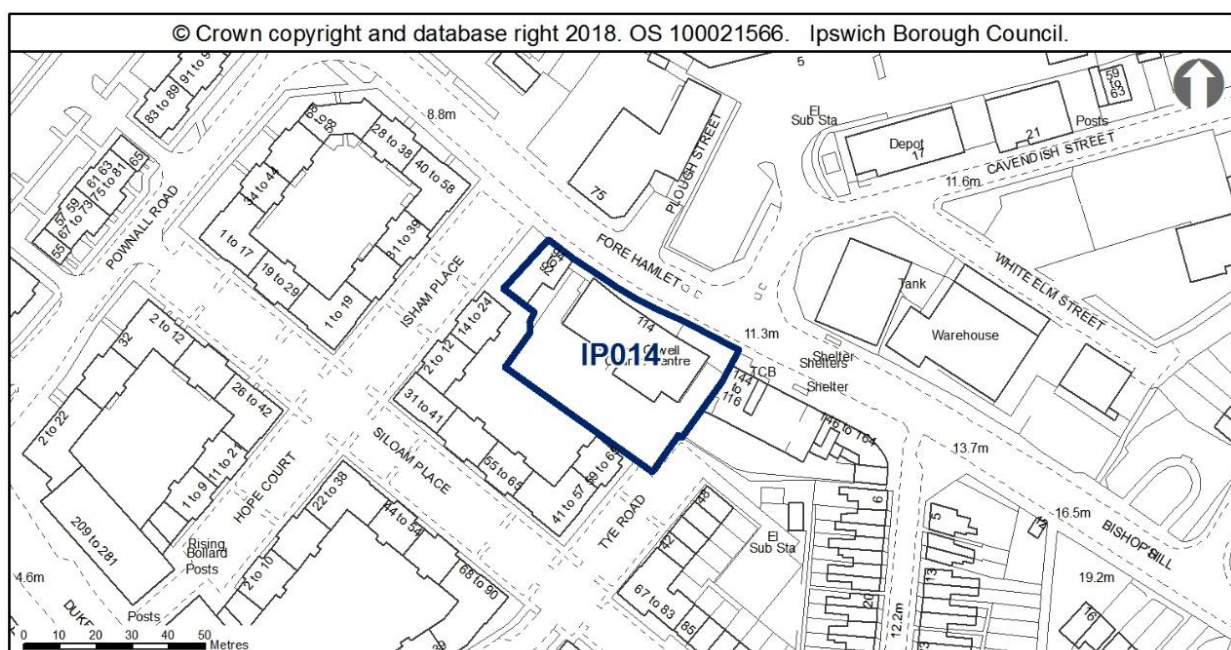
**Table 1 Land allocated for residential use or residential-led mixed use**

Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
IP014	Hope Church Redevelopment is dependent on the appropriate relocation of existing uses.	0.21	<del>23-21-25</del>	110-120dph (DM23a, higher end of range)	S

2.0 IP014 Site Sheet:

**Site ref: IP014 Hope Church, Fore Hamlet**

**Site area: 0.21ha**



## Allocation Policy SP2

Use(s)	Indicative capacity
Residential	<del>23</del> 25 (110 120dph*)

\* see Core Strategy policy DM23 for minimum and average densities.

IBC's response to the request for a note on evidence to justify figure of 15% of energy from decentralised or renewable or low carbon sources.

The justification for the requirement for new major developments to provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources in Policy DM2 arises from the need to address climate change which Ipswich is particularly vulnerable to. This includes exposure to the risks of sea level rises, fluvial flooding and water stress in the region. The policy will help to meet Objective 5 of the Local Plan Review. It also sets a direction of travel to help meet the Government's zero carbon target by 2050 and aligns with the 15% renewable energy target to 2020 set by the National Renewable Energy Action Plan for the United Kingdom.

The East of England Regional Spatial Strategy (RSS) (2008) set a target of 10%. Following the RSS abolition, the Council set a target of 15% in the now superseded 2011 Local Plan to take account of Ipswich's vulnerability to climate change impacts. This was carried through to the adopted 2017 Local Plan Review.

The 15% energy requirement is the equivalent of Code for Sustainable Homes Level 3 and the Whole Plan Viability Assessment demonstrates that this is viable.

IBC's response to the request for a note to explain parking strategy in relation modal shift strategy, and justification for allocation of 4 sites for MSCPs in Policy SP17.

The Ipswich Parking Strategy (D41) was prepared taking into account the modal shift strategy for the Ipswich Strategic Plan Area (ISPA). One of the objectives of the strategy was to "support initiatives to promote sustainable modes of travel". In forecasting future parking demand, it assumed a 10% reduction in parking demand in Ipswich that could be delivered by the successful implementation of wider ISPA-wide sustainable transport and travel measures by 2036.

The Strategy identified that there are specific shortfalls in capacity that would need to be addressed in the Riverside, Station & Office and Town Centre North Zones. Site IP049 is in the Riverside zone. Sites IP015 and IP051 are in the Station and Office zone. Site IP048 is in the Town Centre, Central and West zone but is needed to absorb capacity lost through the redevelopment of temporary car parks. It is also in close proximity to the Town Centre North zone where there are limited opportunities to allocate land for parking and so will help meet this identified shortfall. The four sites have been selected in consultation with Suffolk County Council and their allocation would not prohibit the transport mitigation strategy for the ISPA (D39) from being implemented. The precise parking capacity of each site will be determined through the Ipswich Area Parking Plan. Policy SP17 does not prevent the Ipswich Area Parking Plan from being implemented once drafted. The Parking Strategy sets out the net change in spaces required for each zone and any proposals for long-stay car parks will have to demonstrate that they will not compromise the ability for the net change to be delivered. Policy SP17 of the adopted Local Plan (2017) already uses this approach successfully, as demonstrated through the assessment of planning permission 20/00398/OUT13 for a multi-storey car park on Site IP051.