

Ipswich Borough Council Local Plan

**Examination of Core Strategy and Policies Development Plan Document
Review and Site Allocations and Policies (Incorporating IP-One Area Action
Plan) Development Plan Document**

**Stage 2 Matters and Questions - Response to Matter 11 IP-ONE Area Action
Plan (except transport issues)**

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**Matter 11 – IP ONE Area Action Plan (except transport issues)
(Policies CS3 and Opportunity Areas A, B, C, D, E and F)**

11.1 Are the policies and listed development opportunities/principles in connection with the IP-ONE Area Action Plan soundly-based? If you contend that they are not how should they be modified?

1. Town Centre and Retail policies and allocations have been addressed in the Council's response to Matter 7 and are a key part of the plan for the IP-One Area.

Consistent with National Policy

2. The policies for the IP-One Area reflect a number of NPPF policies and 'core planning principles'. The 'core planning principles' require planning to 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'; to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'; and to 'promote mixed use developments, and encourage multiple benefits from the use of land in urban...areas'.
3. Specifically in relation to town centres, which part of the IP-One area is defined as, the NPPF states that planning authorities should pursue policies to support their viability and vitality including allocating sites to meet requirements for retail, leisure, commercial, office, tourism, community and residential development (paragraph 23).
4. The NPPF also states that 'the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.' (paragraph 29).

Positively Prepared

5. The Council's early work on the IP-One Area Action Plan was in accordance with the guidance at the time, including Planning Policy Statement 12 Local Spatial Planning 2008¹. This advised that area action plans should be used to provide the planning framework for areas where significant change or conservation is needed (paragraph 5.4), for example to stimulate regeneration. The Site Allocations Topic Paper² provides more information about the preparation process, including the incorporating of the IP-One Area Action Plan into the Site Allocations and Policies Development Plan Document, and the content of the opportunity area section.
6. The Council has produced a plan for the IP-One area to enable the Council to take a focused, positive approach to planning for the central area of Ipswich. The IP-One area is the focus for shopping, offices, leisure, further education and residential uses, and contains many of the town's important heritage assets. The IP-One area also contains the town's transport hubs including two bus stations and the train station as well as key parts of the road network. The Ipswich Waterfront and parts of the operational Port of Ipswich are also incorporated within the IP-One area. The IP-One Area forms a key part of the Council's Spatial Strategy as set out in policies CS2 and CS3 of the Plan and is the location of many of the development opportunities in the Borough.

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<http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/archived/publications/planningandbuilding/pps12lsp>

² IBC, October 2015, *Site Allocations Topic Paper*, CDL reference LPCD45

7. Together, this concentration and mix of uses, opportunities and constraints, lends itself to the production of an area action plan within which the roles of different parts of the central area can be clearly defined and positively planned for.
8. The future of the IP-One area is of importance to numerous sectors and it has been important that the Council engages with representatives of these in shaping the plan. An Issues and Options Paper for the IP-One Area was issued for consultation in June 2006³ and subsequently a Preferred Options consultation was held in November 2007⁴. The comments received to both consultations informed the draft plan for the IP-One area as contained within the Draft Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (2013). The Site Allocations Pre-Submission Consultation Statement explains how the earlier comments were addressed in the production of the draft plan.
9. The Council works proactively with key organisations relevant to the future development of the IP-One area. In 2012 the Council produced a Town Centre Master Plan⁵ through engagement with Ipswich Central, the Business Improvement District company for Ipswich. The Master Plan sets out a vision for the town centre, much of which has been taken forward through the IP-One Area Action Plan. The development of the IP-One Area Action Plan specifically takes forward the following recommendations:
 - actively promote new developments which provide a range of unit sizes rather than large single department stores (a range of sizes of retail unit are promoted through the Opportunity Areas);
 - promote a 'cafe culture' by permitting more food and drink uses in the town centre retail heart (taken forward through changes to CS14 and DM20 which would support an element of non-retail main town centre uses in the Central Shopping Area);
 - concentrate any large-scale office development in the Ipswich Village/Portman Road areas (taken forward through the River and Princes Street Opportunity Area);
 - support and encourage businesses in the growth sectors to locate and develop within the town centre;
 - residential-led mixed-use development on the Cox Lane car park east of Cox Lane (part of the site formerly known as the 'Mint Quarter');
 - the Star Lane area to the rear of Old Customs House should be the main focus for additional student accommodation (note that the 2013 study raises a question over future demand for such accommodation);
 - sustainable mixed-use development incorporating residential should be promoted throughout the town centre (all Opportunity Areas with the exception of the River and Princes Street Corridor include an element of residential);
 - residential development should be encouraged throughout the town centre, particularly family units (all Opportunity Areas with the exception of River and Princes Street Corridor include an element of residential).
10. More recently, Ipswich Central produced a vision for the town centre⁶⁷. This Vision brings together the aspirations of the partners on a range of issues and identifies a series of actions for the next few years. Some of these are relevant to the Local Plan and others are not. The Local Plan and the Ipswich Central Vision for Ipswich are considered to complement each other in a helpful way. Examples of the ways in which the Local Plan supports the vision include:

³ Ipswich Borough Council, 2006, *IP-One Area Action Plan Issues and Options*, CDL reference LPCD05

⁴ Ipswich Borough Council, 2007, *IP-One Area Action Plan Preferred Options*, CDL reference LPCD08

⁵ Ipswich Borough Council, 2012, *Town Centre Masterplan*, CDL reference ICD16

⁶ Ipswich Central, May 2015, *Turning Our Town Around*, CDL reference ICD79

⁷ Ipswich Central, July 2015, *Turning Our Town Around*, CDL reference ICD84

- New residential development in the town centre, including at the Mint Quarter and Merchant Quarter (including Waterfront);
 - New office development in the Princes Street corridor;
 - New multi-storey car park on the site of the former multi-storey car park on Crown Street;
 - Increased support for cultural and leisure uses in the Central Shopping Area (through changes to policy DM20 as part of the Core Strategy review).
11. In relation to the specific Opportunity Areas the plan has been positively prepared in the following ways:
- A the Island Site – ongoing discussion with Associated British Ports as main landowner;
- B Merchant Quarter – liaison with agents acting for stalled sites on the Northern Quays and the owners of key site opportunities such as Archant (IP054);
- C Mint Quarter – discussions with the Co-op as one of the key land owners
- D Education Quarter – ongoing discussion in relation to the UCS Estates Strategy and student accommodation needs
- E Westgate – meetings with other landowners alongside IBC regarding options for the redevelopment of the site
- F River and Princes Street Corridor – liaison with other landowners alongside IBC focused on delivering the office corridor.
12. Discussions were also held with the key interests in respect of the opportunity sites examined by DTZ in 2013⁸.

Justified

13. In 2013 the Council commissioned the Ipswich Town Centre Opportunity Areas Report to provide guidance on the commercial potential for future development in different parts of the IP-One area. The Opportunity Areas specifically addressed in the report were Opportunity Area B ‘Merchant quarter’, Opportunity Area C ‘Mint Quarter’ (known as Cox Lane Opportunity Area in the report and Opportunity Area E ‘Westgate’. The recommendations of the DTZ report are summarised below in relation to these areas:

Opportunity Area B - Merchant quarter

14. The 2013 Study identified the Merchant Quarter as suitable for a mix of uses, primarily offices but with small scale retail, leisure and residential. Other than small scale ancillary uses, retail is not judged to be suitable on this site due to the distance from the Primary Shopping Area. A mix of uses is proposed in the Site Allocations DPD to reflect this.
15. The DTZ report also considered a Waterfront Opportunity Area which forms part of the Merchant Quarter in the IP-One Area Action Plan. The Waterfront Opportunity Area was judged to be unsuitable for large scale retail due to its distance from the Primary Shopping Area and due to the busy routes of Star Lane / College Street which form a physical barrier to the Central Shopping Area. Large retail development in this area would also be likely to have an adverse impact on the town centre, although small scale ancillary retail would be appropriate. However, the Study identified an opportunity to further develop the leisure and evening economy through developing a mix of leisure, cultural and residential development. Policy SP11 of the Site Allocations DPD contains guidance in relation to the waterfront, specifically supporting non-retail uses in reflection of the DTZ study conclusions.

⁸ DTZ, 2013, *Town Centre Opportunity Study*, CDL reference ICD15

Opportunity Area C - Mint Quarter

16. In relation to the Cox Lane Opportunity Area (Mint Quarter) the DTZ study identified a residential led scheme supporting retail and leisure. Retail was concluded to be difficult to deliver due to the distance from the main anchor stores of the town and the Site Allocations DPD reflects this through the mix of uses proposed being residential-led. The Study also suggests that this part of the town is appropriately defined as part of the Secondary Shopping Area. It should be noted that policy SP10 suggests that the western part of the site could come forward for comparison retail if the Westgate site is developed primarily for convenience retail, to help to address the scale of potential capacity for comparison retail identified in the 2010 Study. The residential element is allocated as site IP048 and it is considered the site will come forward in the medium term due to the range of landowner interests which exist.

Opportunity Area E - Westgate

17. The DTZ report identified Westgate as the most suitable site for a retail led scheme, due to its location in relation to existing anchor stores in the more westerly part of the town centre, although linkages with the Primary Shopping Area would need to be enhanced. The Study states that the site is most likely to be suitable for a foodstore, particularly should other sites not be delivered. As the planning permission for a Tesco store on Grafton Way has now lapsed, this would further strengthen the prospects for a foodstore in this location. The Study identified an element of residential could also form part of the development of the area.

18. Justification for the approaches in the other Opportunity Areas is set out below:

Opportunity Area A – Island Site

19. Within the Opportunity Area, the Island Site IP037 represents a large and key remaining development opportunity within the Waterfront with great regeneration potential but also significant constraints such as access and flood risk – which are being addressed. It is also a key link in improving cycling and walking routes at the Waterfront and an opportunity for addressing the deficit in public open space in the area. With its maritime history, uses, and remaining historic structures, it has the potential to deliver a heritage based visitor attraction as well as homes and employment uses. The allocation of the Island Site indicates the intention to prepare a master plan for the site to look at the use mix and layout. Part of the Island Site was recently awarded Enterprise Zones status⁹. The Zone area broadly corresponds with the ‘development option’ on the northern part of the site as identified in the IP-One Area Action Plan and is consistent with the mix of uses identified in in the plan for the site. On the West Bank, development has already progressed with the Genesis scheme at Stoke Quay, but some smaller site opportunities remain such as IP133.

Opportunity Area D – Education quarter

20. The Education Quarter is part way through its development. Suffolk New College has been completed on the northern part of the site. For University Campus Suffolk (UCS) two phases of growth have so far completed. It is understood that UCS wish to consolidate their teaching and student accommodation at the Waterfront. Land opportunities remain south of the James Hehir Building, (formerly ‘Shed 7’), and to the north (‘Shed 8, site IP049). There also remains the question as to the future use of the ‘old’ campus to the north of Fore Street alongside the primary school allocation. It is a priority of the plan to support the growth of the university and ensure that land remains available for its future expansion.

⁹ New Anglia LEP, 2016, *Space to Innovate brochure*, CDL reference PSCD25

Opportunity Area F – River and Princes Street Corridor

21. The River and Princes Street corridor creates a link between Ipswich station and the town centre and is already home to a number of office uses including Ipswich Borough Council and Suffolk County Council main offices.
22. The Employment Land Needs Assessment (ELNA) identifies Ipswich as a major regional centre and is the historic financial and administrative centre of Suffolk and goes on to specifically identify a concentration of office uses related to these sectors in Princes Street. The ELNA also recognises however that the stock of 'Grade A' office space in Ipswich is very low.
23. 2.9 hectares of land at Princes Street was recently awarded Enterprise Zone status which supports the plan's proposals for office led development in the Opportunity Area.
24. The proposals for the River and Princes Street Corridor Opportunity Area seek therefore to build upon the area's existing role in the office sector and to enhance provision in this respect.
25. Policy CS3 and the proposals for the Opportunity Areas have been assessed through the Sustainability Appraisal process. Alternative approaches for the IP-One area were considered through the Preferred Options Sustainability Appraisal in 2007¹⁰ and the justification for selecting the preferred approach is set out in the Preferred Options IP-One Area Action Plan¹¹. Alternative uses for the specific site allocations in the IP-One Area are contained in Appendix D to the submitted Sustainability Appraisal report. Proposals for the Opportunity Areas themselves are based largely on enhancing the existing uses in these locations and this limits the extent to which realistic substantial alternative approaches can be considered. The exception is the Island Site and alternative mixes of uses were considered through the assessment of alternative uses for site allocations (Appendix D of Site Allocations Sustainability Appraisal report).
26. The Sustainability Appraisal identified a number of mitigation measures in relation to potential effects identified for policies relating to the IP-One area and the Opportunity Areas. The Council's Annex to the Sustainability Appraisal¹² explains how these recommendations have been addressed in the plan.

Effective

27. The plans for the IP-One area and Opportunity Areas are considered to be deliverable, however it should be acknowledged that achieving large scale redevelopment, as is the case for a number of the Opportunity Areas, is a long term ambition involving numerous interests.
28. In relation to the Opportunity Area E 'Westgate', the Council is working with developers to produce options for a masterplan for the site based upon the proposed allocation.
29. In relation to the Island Site the recent award of Enterprise Zone status may help to stimulate redevelopment of areas of the site. The recent announcement of Government funding towards the Wet Dock Crossing reinforces the likelihood of this being delivered¹³ and this will assist with the delivery of the wider aims for the Island Site.

¹⁰ Ipswich Borough Council, 2009, *Sustainability Appraisal Preferred Options*, CDL reference LPCD09

¹¹ Ipswich Borough Council, 2007, *IP-One Area Action Plan Preferred Options*, CDL reference LPCD08

¹² Ipswich Borough Council, 2014, *Annex to Proposed Submission Sustainability Appraisal Reports*, CDL reference LPCD36

¹³ <http://www.newanglia.co.uk/2016/03/16/government-green-light-for-ipswich-wet-dock-crossing/>

30. The Council therefore concludes that these policies are soundly based.

Modifications

31. It should be noted that the boundary of the Education Quarter was omitted from some versions of the submitted IP-One Area Inset Map. The Council wishes to propose an amendment to show this area on the map to rectify this.