

IPSWICH BOROUGH COUNCIL LOCAL PLAN  
CORE STRATEGY AND POLICIES DEVELOPMENT PLAN  
DOCUMENT REVIEW—  
FINAL DRAFT



**IPSWICH**  
BOROUGH COUNCIL

FINAL DRAFT, JANUARY 2020  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

# CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW 2018.

## FOREWORD

Following adoption of the Local Plan review in February 2017, the Council has been cooperating in the production of an aligned local plan with the Councils that adjoin the borough boundaries and share in the same housing market with the town. The Council maintains the belief that the planning of our town is one of our key roles and as such we are, once again, pleased to set out our vision, objectives and strategy for the future development of Ipswich. It is vital that we maintain up to date policies that conform with national guidance so that we can protect and enhance the town's key assets. We continue to work for the town's future and seek to manage changes that benefit the town's existing residents, businesses and visitors.

This is a review of the Council's Core Strategy and Policies document which sets our policies for the future development of the town and forms part of the Ipswich Local Plan. The new Plan will cover the period from 2018 to 2036, which takes key national guidance from the 2019 National Planning Policy Framework into account.

The national challenges facing us in the delivery of housing and in our town centres means that this local plan has increased importance as the key strategy document that will help shape our response. We look forward to working with our partners to implement the strategy contained within this document. Accompanying this consultation document, a Site Allocations and Policies Development Plan Document adds site-specific detail to the strategy.

To find out more please see the Council's website [www.ipswich.gov.uk/localplan](http://www.ipswich.gov.uk/localplan) or contact the Planning Policy team at the Council via [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk) or telephone number 01473 432019.

*Councillor Carole Jones*

Portfolio Holder for Planning & Museums

January 2020

# Contents

	Page number
Foreword	1
Chapter 1 – Introduction	4
<b>PART A – The Context</b>	<b>9</b>
Chapter 2 – The Planning System	10
Chapter 3 – The Local Enterprise Partnership	15
Chapter 4 – The Duty to Co-operate	16
Chapter 5 – Ipswich - The Place	17
<b>PART B – The Strategy</b>	<b>27</b>
Chapter 6 – Vision and Objectives	28
Chapter 7 – Key Diagram	34
Chapter 8 – The Spatial Strategy	36
• Ipswich Strategic Planning Area	36
• Spatial approach	43
• Live	63
• Work	86
• Learn	92
• Play	94
• Infrastructure	97
<b>PART C – Development Management Policies</b>	<b>107</b>
Chapter 9 – Development Management Policies	108
<b>PART D – Implementation, Targets, Monitoring and Review</b>	<b>187</b>
Chapter 10 – Implementation	188
Chapter 11 – Key targets associated with Part B	207
Chapter 12 – Monitoring and Review	212
<b>PART E – Appendices</b>	<b>213</b>

The Appendices included within this report are:

Appendix 1 – A list of policies contained in this document	214
Appendix 2 – Community Facilities in District and Local Centres	228
Appendix 3 – Activities or services relevant to each Planning Standard Charge Heading	217
Appendix 4 – Ipswich Standards for the Provision of Open Space, Sport and Recreation Facilities	219
Appendix 5 – Glossary	220
Appendix 6 – Marketing Requirements	232
Appendix 7 – DM27 Central Shopping Area Maps	234
Appendix 8 – Heritage Statement Guidance	235

# CHAPTER 1: Introduction

## 1.1. What the Document Covers

- 1.2. This document is the Core Strategy and Policies Development Plan Document for Ipswich. It forms part of the Ipswich Local Plan. It covers three areas of policy.
- Firstly it sets out a strategic vision and objectives to guide the development of the town (Chapter 6);
  - Secondly it promotes the spatial strategy for the development of the town to 2036 through strategic policies within the context of the Ipswich Strategic Planning Area (Chapter 8); and
  - Thirdly, it provides a suite of policies to control, manage and guide development across the Borough (Chapter 9).
- 1.3. It also includes two non-policy based areas. Firstly a section on the context to the whole document which explains, amongst other things, the planning system (Chapter 2), the New Anglia Local Enterprise Partnership (Chapter 3), the Duty to Co-operate (Chapter 4), and an explanation as to how all Ipswich's planning documents fit together (Chapter 1). It also paints a picture of Ipswich in terms of its geography, history and character and provides some facts about Ipswich as a place (Chapter 5). Secondly, there is a section on implementation, targets and monitoring proposals (Chapters 10, 11 and 12).
- 1.4. At the back of this document there are a limited number of appendices providing more detail to the policies, for example on open space standards.

## 1.5. How the document is structured

- 1.6. The final draft local plan is written in two main parts. The first part 'Core Strategy and Policies Development Plan Document' sets out the vision of the future for Ipswich to 2036 and contains a set of general policies which will help to achieve this vision. It also contains a set of 'development management policies' which interpret these more general policies into policies which can be used in connection with processing planning applications and giving planning advice on future applications. The second document the 'Site Allocations and Policies (incorporating IP One Action Plan) Development Plan Document' identifies a range of sites for different uses across the whole Borough that are allocated for development. It sets out policies for town centre leisure and retail uses and policies for the Ipswich IP-One Area. Each of the two main policy chapters (8 and 9) follows the same broad structure. In each case a policy is identified and then structured into the following sections:
- A short introduction to the issue, where needed;
  - The policy; and
  - The justification for the policy, how it supports plan objectives and guidance on its implementation.

## 1.7 The purpose of the document

- 1.8 This document sets out the strategy for the future development of Ipswich to 2036. It indicates broadly how and where the Borough will accommodate development to meet local needs identified through the evidence base. It also explains how it will ensure this is done in a sustainable way. It contains detailed policies to enable the management of development in Ipswich. Proposed development will be assessed against all relevant policies contained within this plan, the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document and any other relevant plan.
- 1.9 More fundamentally, the purpose of the document is to support the Council's 'place shaping' role. This involves the Council in showing community leadership and working closely with partners locally, to ensure that Ipswich's problems are tackled and that a shared vision for the future is realised in a coordinated way.

- 1.10 The Local Plan consists of a series of documents that together will guide development in Ipswich (for more information see Chapter 2).
- 1.11 The Local Plan itself sits in a context of many more plans and strategies prepared at sub-regional and local levels to guide the work of the Council and its partner organisations. Some of the key sub-regional and local strategies are illustrated in Diagram 1.
- 1.12 As the local plan develops, it is subject to Sustainability Appraisal (including Strategic Environmental Assessment) and a Habitat Regulations Assessment. At each stage of plan-making, the policies and proposals in the plan are reviewed to ensure that they comply with the Habitat Regulations Directive 92/43/EEC. An assessment is required under the EU Habitats Directive 4 to ensure that the Local Plan will not result in harm to the integrity of European protected sites. A Screening Assessment was undertaken to inform the First Draft Local Plan which identified those policies in the plan for which an Appropriate Assessment would be required as the plan moves forward. To support the Final Draft Plan, the Council have undertaken a Habitats Regulation Assessment to inform the policies and site allocations within it. The assessment ensures that the legal and regulatory requirements outlined under the EU Habitats Directive are adhered to as part of the plan making process. This has been assessment has been published alongside the final draft local plan.
- 1.13 Sustainability Appraisal is an iterative process which must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging Local Plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives. A Sustainability Appraisal has been undertaken on all the different policy and site options considered during each stage of Local Plan preparation. The Sustainability Appraisal also considers the cumulative effect of the Local Plan on sustainability objectives. The Sustainable Appraisal Assessment of the final draft Local Plan is published alongside the plan.
- 1.14 When this draft local plan is adopted, it will replace the 2017 Ipswich Local Plan as planning policy for Ipswich.

Suffolk Mental Health Partnership

Suffolk Strategic Partnership  
Suffolk Sustainable Community Strategy 2008-2028

Marine Management South East Marine Plan

Suffolk County Council Children and Young People Strategy

University of Suffolk and Suffolk New College Plans

Suffolk County Council Education and Learning

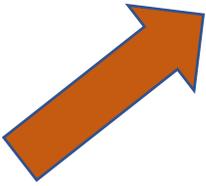


**IPSWICH LOCAL PLAN**

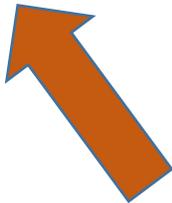


Policing Plan and Safer Neighbourhoods

Suffolk Growth Strategy  
Suffolk Climate Action Plan 3



Ipswich Borough Council Corporate Plan: 'Building a Better Ipswich'  
Allotment Strategy  
Air Quality Action Plan  
Economic Strategy  
Housing Strategy  
Open Space and Biodiversity Policy  
Play Strategy  
Tree Management Policy  
Ipswich 2019 SFRA refresh



NHS England (NHSE) Ipswich and East Suffolk Commissioning Group  
NHS Property Services Ltd

Suffolk County Council Waste and Minerals Local Plan

New Anglia Local Enterprise Partnership Economic Strategy for Norfolk and Suffolk 2017 Integrated Transport Strategy 2018

Ipswich Strategic Planning Area Statement of Common Ground  
Jointly Commissioned Studies

Ipswich Central: 'Turning our Town Around – Advancing the Vision to Create East Anglia's Waterfront Town'

Suffolk County Council Local Transport Plan

Voluntary and Community Sector

Suffolk Flood Risk Management

Diagram 1 – Local Context for the Ipswich Local Plan

**1.15 The status of the document**

1.16 The adopted Core Strategy and Policies Development Plan Document is formally part of the development plan and therefore has significant weight via the Planning and Compulsory Purchase Act 2004 - i.e.

*“... for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the (development) plan unless material considerations indicate otherwise.” (Section 38(6) of the Act).*

1.17 The Council is required to keep the plan under review and this review updates the adopted plan of February 2017.

# Part A: The Context

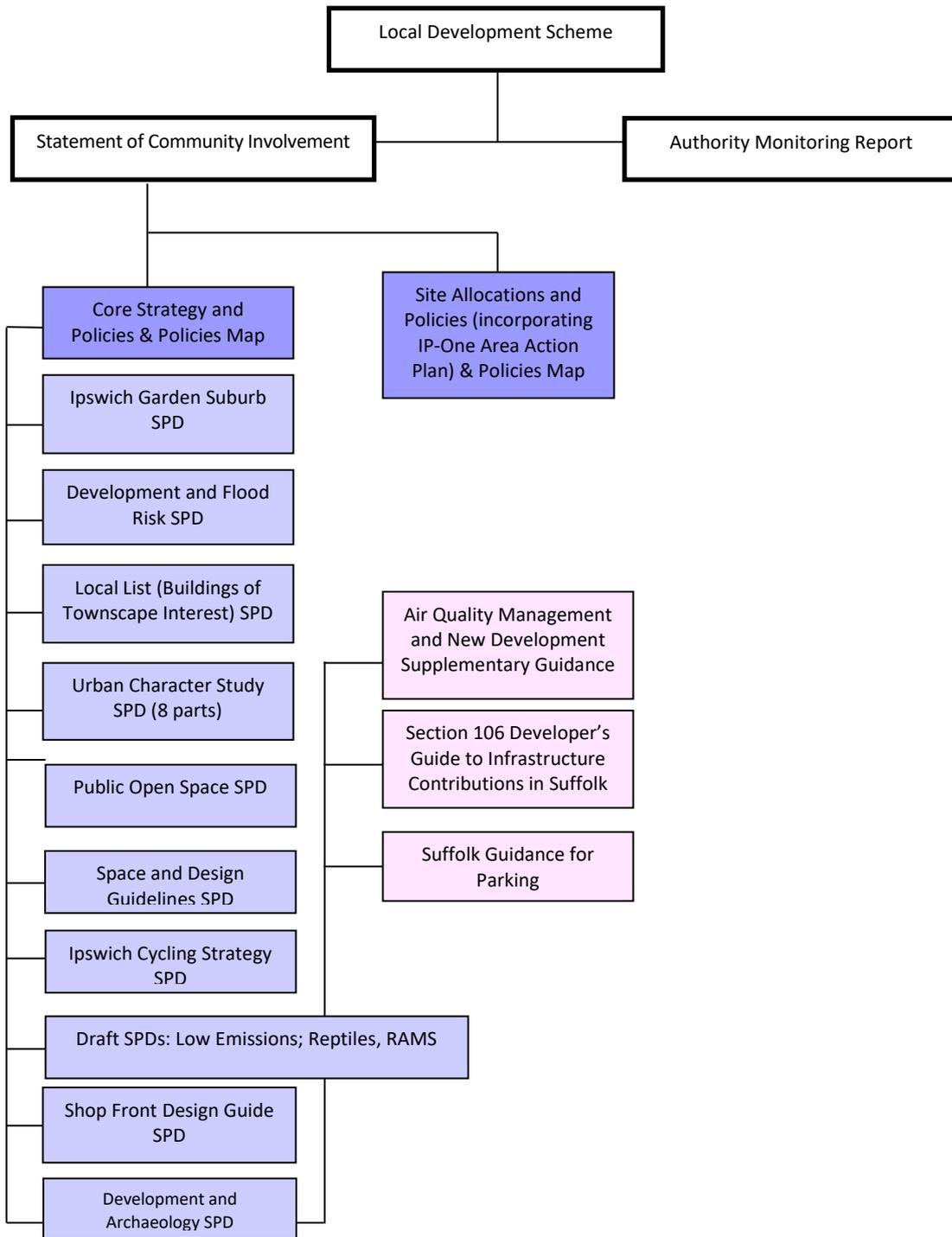
## CHAPTER 2: The Planning System

- 2.1 The current development planning system was established through the Planning and Compulsory Purchase Act 2004 and subsequent amendments, such as the Localism Act 2011 which introduced neighbourhood plans. The national approach to planning policy is explained in the new National Planning Policy Framework (NPPF 2019), Planning Practice Guidance and other documents covering specific topics such as the Marine Policy Statement and Planning Policy for Travellers Sites. The NPPF 2019 maintained the presumption in favour of sustainable development. For plan making, this means that local planning authorities should plan positively to meet the development needs of their area, and meet objectively assessed needs unless the adverse impacts of doing so would ‘significantly and demonstrably outweigh the benefits’, or specific policies of the NPPF indicate that development should be restricted. The NPPF also contains national land use policy on matters such as the economy, town centres, transport, housing and good design. Policies in the NPPF are supplemented by the National Planning Practice Guidance (NPPG), an online set of guidance on implementing the policies in the NPPF.
- 2.2 Section 38(6) of the Planning and Compulsory Purchase Act states that:
- “... for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the (development) plan unless material considerations indicate otherwise.”*
- 2.3 The development plan for Ipswich will comprise various development plan documents, which will be adopted by the Borough Council as part of the Local Plan.
- 2.4 The Local Development Scheme for Ipswich sets out the documents, processes and timescales involved with the Local Plan.
- 2.5 The components of the Ipswich Local Plan are illustrated in Diagram 2. The adopted Local Plan Proposals Map will remain extant until replaced through other development plan documents (DPDs) to be prepared as part of the Ipswich Local Plan.

**Notes to diagram**

- The Statement of Community Involvement Review, adopted in March 2018, sets out how people will be involved within the planning process;
- The Core Strategy and Policies Development Plan Document (i.e. this document) sets out the strategy for the development of the town and also includes policies that will seek to guide and manage development;
- The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document and policies map will highlight land that is the subject of designations that means it will be protected, and identify allocations of land for specific types of development. It will also set out the vision for an urban renaissance for a large part of central Ipswich and provide design guidelines;
- Supplementary Planning Documents can be theme-based documents providing additional detail to support the implementation of policies in the development plan documents, or site development briefs.

Diagram 2 Ipswich Local Development Scheme



Key

Development Plan Document

Supplementary Planning Document

Supplementary Guidance

- 2.6 A key element of the planning system is the requirement to undertake Sustainability Appraisal and Strategic Environmental Assessment as documents are produced. The Sustainability Appraisal involves assessing strategic alternatives, policies and proposals against social, economic and environmental objectives to identify possible negative impacts. Policies are modified in response to the results, to ensure that harmful impacts are avoided or mitigated. Strategic Environmental Assessment focuses solely on environmental impacts. The baseline assessment helps to identify the issues facing the Borough in terms of economic, social and environmental objectives through document review. The sustainability appraisal is revisited at each stage of plan-making. A Sustainability Appraisal Report setting out the Council's work in both areas will be published for consultation alongside this document.
- 2.7 Another requirement is an Appropriate Assessment of the plan under the Habitats Directive. This is an assessment of the potential effects of a proposed plan on sites of European importance for nature conservation. These include sites, often known as Natura 2000 sites, designated as Special Areas of Conservation (for habitats, and species except birds) or Special Protection Areas (for birds). Government policy in the National Planning Policy Framework applies the same protection to Ramsar sites also. The Orwell and Stour Estuaries are designated as a Special Protection Area and Ramsar Site.
- 2.8 A plan may only be approved if it can be shown that it will not adversely affect the integrity of a European designated habitat. A report published alongside this document explains the findings of the Appropriate Assessment. Where policies or proposals have been included in order to address the findings of the Appropriate Assessment, it is explained in the reasoned justification.
- 2.9 The Government first published the National Planning Policy Framework (NPPF) in March 2012. The NPPF was further updated in 2018 and 2019. In response, the Council introduced and maintains a presumption in favour of sustainable development, which is set out in policy CS1 of this document. The NPPF requires that local planning authorities ensure that their Local Plan provides a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period in this case to 2036<sup>1</sup>.
- 2.10 Section 110 of the Localism Act sets out the Duty to Cooperate. The duty applies to all Local Planning Authorities, National Park Authorities and County Councils in England and to a number of other prescribed public bodies. The Duty to Co-operate requires these bodies to engage constructively, actively and on an ongoing basis in relation to strategic cross boundary planning issues. Local Planning Authorities have to demonstrate how they have met the requirements of the duty. This is dealt with in more detail in Chapter 4.
- 2.11 The NPPF advises that each local planning authority (LPA) should produce an aspirational but realistic plan for its area. LPAs invest significantly in the preparation of these plans, including engaging with all sections of the community in their development.
- 2.12 The essential test for the Local Plan is whether it meets the tests of 'soundness'. These are clearly defined in the NPPF. NPPF (paragraph 35) makes clear that a sound plan is one which is positively prepared, justified, effective and consistent with national policy.
- 2.13 To meet the test of being 'justified', the Local Plan needs to set out 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.' The plan strategy has been developed as a result of reviewing the adopted plan strategy and the updated evidence base, and testing the emerging plan at each stage through the sustainability appraisal process. The issues and options consultation in 2017 explored alternative growth scenarios jointly

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<sup>1</sup> *National Planning Policy Framework, paragraph 23, p. 9*

with Suffolk Coastal District Council (now East Suffolk Council) and ways in which growth could be delivered. The preferred options draft Local Plan published in January 2019 set out the proposed strategy for meeting development needs in the Borough which is largely carried through to the Final Draft Local Plan.

- 2.14 Ipswich Borough has a tightly drawn administrative boundary, which constrains the practical options for meeting needs for development, taking as the starting point the national policy requirement for the Borough should meet its own needs if possible. However, the plan seeks to address the objectively assessed needs both for employment and housing and is informed by agreements from other neighbouring authorities through the Ipswich Strategic Planning Area (ISPA) Board. A Statement of Common Ground has been agreed by the members representing the constituent authorities who sit on the ISPA Board.
- 2.15 The spatial strategy is for continued urban regeneration in central Ipswich. This continues a well established approach that has seen a transformation of the Waterfront, and the beginnings of change to a more vibrant mixed use area in the Portman Quarter (formerly Ipswich Village). Alongside the focus on the central area, a sustainable urban extension is allocated on greenfield land at the Ipswich Garden Suburb and a cross-boundary allocation for future development for housing, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, is also identified in north-east Ipswich at the northern end of Humber Doucy Lane.

## CHAPTER 3: The Local Enterprise Partnership

- 3.1 The New Anglia Local Enterprise Partnership (NALEP) was established in 2011 along with 38 other local enterprise partnerships in England. The NALEP area covers both Suffolk and Norfolk and is identified on Map 1 in this document. NALEP are focused on developing business sectors in this area to grow jobs in the region and remove barriers to business growth.
- 3.2 Policy CS13 of this Core Strategy supports the business sectors identified by NALEP and the Council. By cooperating with the County Council and the other Suffolk districts on the Suffolk Growth Strategy, the Council can support the development of jobs on sites in the Borough, identified in the Growth Strategy.
- 3.3 The NALEP Economic Strategy 2017 identifies nine key sectors for the East Anglian region, which have the potential to grow rapidly in terms of jobs and productivity. They include: advanced manufacturing and engineering; energy; information and communication technology, tech and digital creative; financial services and insurance; advanced agriculture food and drink; transport, freight and logistics; life sciences and biotech; visitor economy (tourism and culture); and construction and development. Other Sectors which are particularly well represented in Ipswich are: information and communication technology, finance and insurance, transport/ port and logistics, tourism and creative and cultural industries.

## CHAPTER 4: The Duty to Co-operate

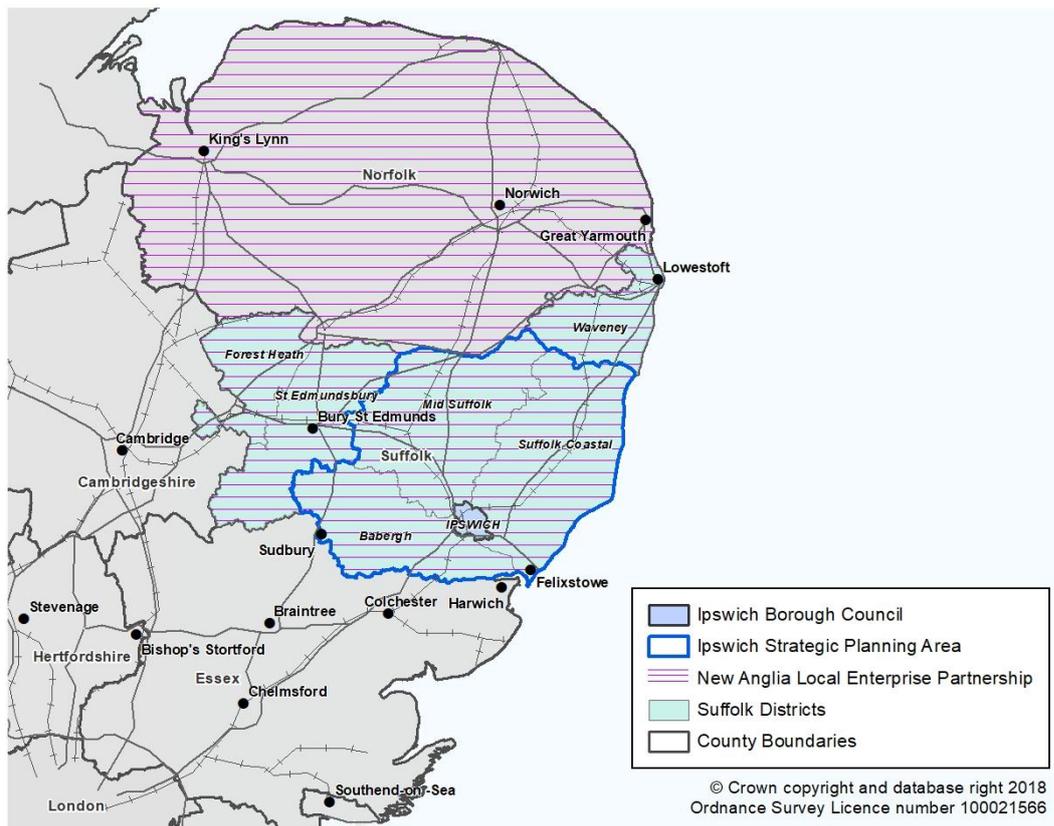
- 4.1 The Localism Act 2011 imposed on public bodies a 'Duty to Co-operate' on planning issues that cross administrative boundaries. It particularly applies in relation to strategic, cross-boundary issues, such as the provision of jobs and homes, retail, leisure and commercial development, the provision of infrastructure including transport and water, health and other community and cultural facilities, climate change mitigation and the conservation and enhancement of the natural and historic environment.
- 4.2 Local planning authorities must demonstrate at the Local Plan examination how they have complied with the Duty to Co-operate. If another authority or partner agency will not co-operate, it does not mean a plan cannot be submitted for examination. However, it does mean that strong evidence would be needed of the efforts made to engage and reach agreement with that authority. The Duty to Co-operate should be reflected in strategic policy outcomes and not simply be a process of consultation.
- 4.3 Other bodies as prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012 are also covered by the Duty to Co-operate. They are as follows:
- Environment Agency
  - Historic England
  - Natural England
  - Civil Aviation Authority
  - Homes England
  - Clinical commissioning groups established under section 14D of the National Health Service Act 2006
  - National Health Service Commissioning Board
  - Office of Rail Regulation
  - Highway Authority
  - Marine Management Organisation.
- 4.4 For the Ipswich Local Plan, a Duty to Co-operate Statement has been prepared alongside the draft Core Strategy Review and the draft Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. The Council is actively engaged with Suffolk County Council and the neighbouring councils of East Suffolk, (formerly known as Suffolk Coastal / Waveney Councils) and Babergh / Mid Suffolk on strategic growth matters, through the Ipswich Strategic Planning Area Board (ISPA). The Ipswich Strategic Planning Area is an area that has long been used for strategic planning purposes around Ipswich and consists of the Borough Council area plus a number of surrounding parishes. A map showing the area covered by the ISPA Board is included in Chapter 8.
- 4.5 Work being undertaken through the Ipswich Strategic Planning Area Board includes joint evidence gathering and agreement on joint approaches to the scale and distribution of future growth, cross-boundary green infrastructure and strategic transport matters. Policies ISPA 1 – 4 of the Core Strategy Review sets out the Council's policy approach to the Ipswich Strategic Planning Area.

## CHAPTER 5: Ipswich - The Place

### 5.1 Ipswich in context

- 5.2 Ipswich is the county town of Suffolk and a major centre of population, economic activity and growth in the Eastern Region. It is a key centre in the New Anglia Local Enterprise Partnership region covering Norfolk and Suffolk. Map 1 below shows Ipswich in context.
- 5.3 The town performs a regional role in delivering growth and performing as a major employment, shopping and service centre, and a focus for transportation. There is in Ipswich also an ongoing need for regeneration to address pockets of deprivation in some of the disadvantaged and physically more run down areas of the town.
- 5.4 Deprivation issues are the result of different combinations of factors that may include higher than average proportions of elderly residents, high unemployment; lower-than average skill level; income deprivation or crime. For example unemployment in Ipswich is higher than that for the eastern region as a whole and the national average, while areas with higher than average pensioner households have implications for the future distribution of health and social care.

**MAP 1: Ipswich in its sub-regional context**



### 5.5 Ipswich the town

- 5.6 As an engine of growth for the East of England, Ipswich has a thriving commercial sector, ICT sector linked to Adastral Park, business and financial services sector and a significant port. It is a centre for education, including the University of Suffolk on the Waterfront, which offers a programme of teaching and research in key sectors. Ipswich also provides a wide range of cultural, sporting and retail provision, which serves the needs of the sub-region. The town has a diverse and multicultural population, and is one of the fastest growing urban centres in the UK.

- 5.7 Ipswich is developing dynamically and prosperously and has strong prospects for growth. Finance, IT and business activities account for one quarter of the workforce, with a similar proportion for distribution, hotels and restaurants, the latter demonstrating the role of Ipswich in sub-regional tourism and the strong night-time economy. This growth is supported at a central, sub-regional and local government level, enabling Ipswich to develop while acknowledging the sense of place established by many historic buildings and areas and its large landscaped parks. Partners have agreed a Greater Ipswich City Deal with the Government with a focus on tackling skills levels and low wages.
- 5.8 The town is well connected in the transport network. Train services provide access to London in just over an hour and links to Norwich, Cambridge and Peterborough, but the network also serves the East Coast and Felixstowe, all essential routes for containerised freight. Ipswich is also closely connected to the trunk road network with the A12 giving access to London, the M25 and Stansted Airport and the A14 linking the Midlands and the Port of Felixstowe. Nevertheless, there are congestion and capacity issues.
- 5.9 Table 1 below sets out some of the town's vital statistics:

**Table 1 – Ipswich Statistics**

Population	117,200 (2001) 133,384 (2011) 136,400 (2014) 137,500 (2018) (Nomis)	
Number of Economically Active People	70,900 (79.6%) (April 2016 – March 2017) 71,900 (81.8%) (April 2018 – March 2019) (Nomis)	
Number of Employed People	67,600 (75.7%) (April 2016 – March 2017) 69,700 (79.4%) (April 2018 – March 2019) (Nomis)	
Employment Sectors (employee jobs) (Nomis 2017)	Mining and Quarrying	0 (0.0%)
	Manufacturing	2,050 (3.5%)
	Electricity, Gas, Steam and Air Conditioning Supply	1,500 (2.1%)
	Water Supply	200 (0.3%)
	Construction	3,000 (4.2%)
	Wholesale and Retail	11,000 (15.5%)
	Transportation and Storage	4,500 (6.3%)
	Accommodation and Food Service activities	4,000 (5.6%)
	Information and Communication	2,000 (2.8%)
	Financial and Insurance Activities	5,000 (7.0%)
	Real Estate Activities	900 (1.3%)
	Professional, Scientific and Technical Activities	3,500 (4.9%)
	Administrative and Support Service Activities	7,000 (9.9%)
	Public Administration and Defence	5,000 (7%)

	Education	5,000 (7.0%)
	Human Health and Social Work Activities	12,000 (16.9%)
	Arts, Entertainment and Recreation	2,250 (3.2%)
	Other Service Activities	1,250 (1.8%)
Number of Self-Employed People	8,400 (9.5%) (East 11.2%) (Great Britain 10.6%) (April 2016 – March 2017) 9,200 (10.5%) (East 11.4%) (Great Britain 10.7%) (April 2018 – March 2019) (Nomis)	
Unemployment	3,600 (5%) (East 3.5%) (Great Britain 4.7%) (April 2016 – March 2017) 3,000 (4.1%) (East 3.4%) (Great Britain 4.1%) (April 2018 – March 2019) Nomis	
Number of Businesses (enterprises)	3,865 (2016) 4,070 (2018) Nomis	
Ethnic group (non-white British)	11% (2011) Census	
Heritage	Over 600 listed buildings, 15 conservation areas, 8 scheduled monuments and 3 registered parks, gardens and cemeteries.	
Average Annual House Building (2014 to 2019)	317.2 dwellings per annum (including assisted living units)	
Average percentage of housing built on previously development land (2014 to 2019)	82.3%	

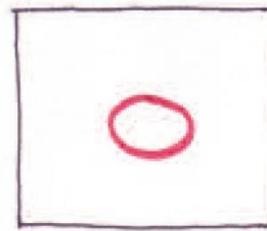
- 5.10 Much of the recent development in the town has been focused around four key central areas: the Waterfront, Portman Quarter, town centre and Education Quarter.
- 5.11 **Ipswich Waterfront** in the 19<sup>th</sup> Century was briefly the largest wet dock in England. Today it is the location for the largest single regeneration project in the East of England and the focus of huge commercial, cultural and institutional investment such as the regional home for Dance East and the University of Suffolk. New buildings benefit from being immediately south of the town centre and connected to it by attractive historic streets. This investment has assisted in the provision of jobs, new housing and educational opportunities.
- 5.12 Progressive regeneration is creating space for a vibrant new cultural, residential, business and leisure area, complementing the existing marina facilities. Along the northern and eastern quays in particular former industrial uses and tall storage silos are being replaced with new architecture in a variety of styles and materials. Generally the new buildings reflect a similar scale and do not detract from those parts of the historic core that extend down to the Waterfront. These strikingly scaled new buildings have largely created their own special character.
- 5.13 The large scale regeneration of Ipswich Waterfront has also encouraged new interest from businesses. On the western bank of the river, Felaw Maltings and the IP-City business centre are both now in demand for their top quality business space, providing facilities for over 800 workers. On the Waterfront itself, one of the town's largest legal practices has chosen to relocate its offices into one of the converted 19<sup>th</sup> Century industrial buildings adjacent to the historic Old Custom House.

- 5.14 To the south-west of the central area, **Portman Quarter** offers a further choice of employment and residential sites. This is already the location of headquarters for Ipswich Borough Council, Babergh and Mid Suffolk District Councils and Suffolk County Council as well as Suffolk Life, Ipswich Crown Courts, Ipswich Town Football Club, Birketts LLP and AXA Insurance among others. This location is well placed for further commercial and institutional uses because of its close proximity to the town centre, the Waterfront and Ipswich railway station.
- 5.15 In April 2007 a **town centre** Business Improvement District (BID) was established, called Ipswich Central. The company has been established to manage the town centre in a new way and bring investment into the retail heart of Ipswich to benefit businesses, residents and visitors. Ipswich Central has the twin aims of promoting and managing the town centre. Through the Ipswich Vision partnership project, it aims to work with stakeholders to create a successful county town centre.
- 5.16 A particularly exciting development for Ipswich was the establishment in September 2007 of a new **Education Quarter** for the University Campus Suffolk, established on and closely related to the Waterfront. This area is the focus of more than £150m investment which brought a brand new campus to the centre of Ipswich in an innovative partnership between the University of Essex and University of East Anglia. Its landmark building on the Waterfront opened in 2008 followed by Athena Hall, a student accommodation block in 2010 and the James Hehir building in 2011. In August 2016 the University gained independence as the University of Suffolk.
- 5.17 The development of this new higher education establishment has also enabled the complete rebuilding of Ipswich's further education facility - Suffolk College. A £59m development of the Suffolk New College was completed in 2009. Both these new education facilities are key to improving and increasing the opportunities and choices for Ipswich. It is anticipated that these will spark further commercial, cultural and academic developments.
- 5.18 The Physical Development of Ipswich**
- 5.19 Ipswich is a large town of great historic and archaeological importance, with origins in the 7<sup>th</sup> Century. The town centre, by an accident of topography, retains the physical character of a much smaller market town. This is partly because the prevailing scale of the town centre is still predominantly that of its medieval and earlier origins - rarely exceeding four-storeys in height - and partly because the town centre sits in a shallow drainage basin of the River Gipping with well landscaped Victorian developments and large parks which disguise the extent of modern development which extends beyond it, especially to the east.
- 5.20 Although recent redevelopment of tall, late 19<sup>th</sup> and 20<sup>th</sup> Century industrial buildings around the Waterfront has emulated the height of these buildings, this has principally been confined to the area of the northern quays to the south of the historic core of the town centre.

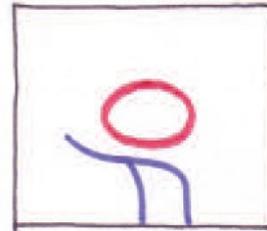
5.21 Historically, drainage constraints have inhibited development to the north of Ipswich and the character of the surrounding countryside infiltrates into the built-up area where Christchurch Park extends southward to the northern edge of the medieval core of the town. The former tidal basin that became the 19<sup>th</sup> Century Wet Dock also constrained the development of Ipswich with houses fanning out westward along the Gipping valley and over a largely flat plateau to the east.

5.22 These physical constraints and historical form of Ipswich have significant consequences for modern day traffic movement, particularly the location of Christchurch Park to the north of the medieval core and the Wet Dock and river to the south. All of these features are important to the character of Ipswich and as conservation areas are also major protected heritage assets. They in effect confine traffic to only three 'crossing-points': Colchester Road north of the park; Crown Street north of the core; and Star Lane - College St/Key Street north of the dock. Opportunities to radically change the traffic patterns within Ipswich are therefore significantly restricted by existing development and physical features.

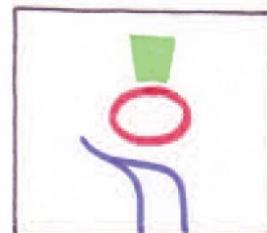
5.23 Beyond the inner Victorian suburbs, Ipswich has developed in the 20<sup>th</sup> Century through large scale, almost entirely two-storey inter-war and post war suburban development. Whilst there are some notable exceptions, much of it is of indifferent architectural quality and lacks the landscaping and open space that would have helped establish a strong localised sense of place.



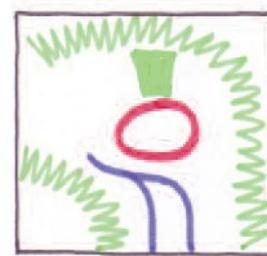
**Historic core**



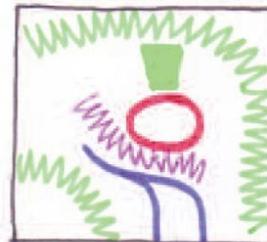
**River**



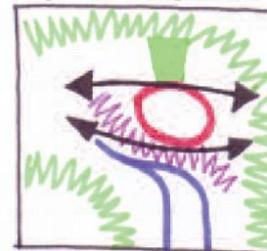
**Christchurch Park**



**Wooded Bowl**



**High Buildings Clusters**



**Constrained Cross Town Movement**

## 5.24 Key challenges for Ipswich over the Plan Period

5.25 Over the plan period to 2036 the issues and challenges mainly stem from how Ipswich can manage and gain best advantage from the significant growth that is taking place:

- accommodating growth in a way that enhances Ipswich's character and unique sense of place, residents' quality of life and the town's biodiversity;
- strengthening the role of Ipswich town centre in response to ongoing changes to the way in which it serves Ipswich's residents and visitors;
- using regeneration opportunities to address deprivation, make places safer and create opportunities for all;
- managing the additional travel demands that growth will generate and guiding as many trips as possible to sustainable modes for the good of the environment, economy and health;
- maintaining accessibility to goods and services in Ipswich including to those living outside its boundary;
- retaining skilled workers and improving skills levels amongst the workforce;
- protecting and supporting appropriately located industrial and business activity;
- managing flood risk, increasing resilience and adapting to a changing climate;
- ensuring that infrastructure provision keeps pace with growth and addressing gaps in access to fast broadband; and
- supporting the completion of key regeneration priorities at the Waterfront.

5.26 Table 2 below identifies a series of key issues which the Ipswich final draft Local Plan will seek to address where practicable as identified through the Sustainability Appraisal Scoping Report.

**Table 2 – Key Issues raised in the Sustainability Appraisal Scoping Report**

<b>Key SA issue across Ipswich and Suffolk Coastal</b>		<b>Ipswich Borough Specific Issues</b>
<b>Population</b>	<i>The need to reduce inequality and social exclusion</i>	<ul style="list-style-type: none"> <li>• Ipswich scores worse than the Suffolk average against every indicator the 'Index of Multiple Deprivation Score' except, barriers to housing and services.</li> <li>• One in five children in Ipswich lives in poverty.</li> <li>• High comparative level of teenage pregnancy</li> </ul>
	<i>Impact of changing demographics and migration trends</i>	<ul style="list-style-type: none"> <li>• The Borough, compared to the rest of the county has a higher number of children, a higher population of working age because of the availability of job opportunities.</li> <li>• Although there is an aging population, there is a trend to retire out to rural areas.</li> <li>• Ipswich expects to see more births than deaths across the decade, 2014-2024</li> </ul>

<b>Housing</b>	<i>The need to ensure the delivery of a sustainable supply of housing</i>	<ul style="list-style-type: none"> <li>• Limited land availability and large areas of protected land.</li> <li>• Over the last two years house sales have fallen by 50% in Ipswich.</li> </ul>
	<i>Ensuring the delivery of mix of housing types and tenures (including affordable housing)</i>	<ul style="list-style-type: none"> <li>• Low comparative level of owner occupiers with no mortgage, higher socially rented stock and higher private rental sector.</li> <li>• Ipswich has the lowest house price to income ratio in the IHMA. Homes cost on average 6.44 times average income. However prices have risen significantly in the last few years and Ipswich has the highest affordable housing need.</li> <li>• Need to deliver a more diverse range of housing types.</li> <li>• The impact of a changing population on housing supply. Increased demand for specialist housing including student accommodation.</li> </ul>
<b>Health and Wellbeing</b>	<i>The need to ensure the delivery of health and social care provision in line with growth</i>	<ul style="list-style-type: none"> <li>• Population is younger than the county, regional and national averages.</li> <li>• Requirement to retain and improve existing community health facilities and services and ensure the timely delivery of new facilities to meet needs arising from new development</li> </ul>
	<i>The need to address health inequalities and public health</i>	<ul style="list-style-type: none"> <li>• Gypsies and Travellers experience some of the worst health in all BME groups.</li> <li>• Ipswich has proportionally more 0-5 year olds than other districts</li> </ul>
	<i>Promoting healthy lifestyles</i>	<ul style="list-style-type: none"> <li>• Ipswich has the lowest levels of physical activity in the region</li> </ul>
	<i>Crime rates and anti-social behaviour</i>	<ul style="list-style-type: none"> <li>• Ipswich had the highest number of criminal offences committed in the IHMA.</li> <li>• Addressing fear of crime.</li> </ul>

<b>Education</b>	<i>The need to ensure the delivery of education provision in line with growth</i>	<ul style="list-style-type: none"> <li>• <i>Insufficient primary and secondary capacity in some areas of the Borough</i></li> </ul>
	<i>The need to ensure appropriate skills to match future employment needs</i>	<ul style="list-style-type: none"> <li>• <i>Overall in comparison with the rest of the region and Britain, Ipswich had lower levels of qualified people at all levels in 2015</i></li> </ul>
<b>Water</b>	<i>Managing water resources and water quality</i>	<ul style="list-style-type: none"> <li>• <i>There are a number of Groundwater Source Protection Zones in Ipswich.</i></li> <li>• <i>High number of existing groundwater and surface water Nitrate Vulnerable Zones.</i></li> </ul>
	<i>The timely provision of new water services infrastructure in line with growth</i>	<ul style="list-style-type: none"> <li>• <i>The timely provision of new water services infrastructure in line with growth</i></li> </ul>
<b>Air</b>	<i>Improving air quality</i>	<ul style="list-style-type: none"> <li>• <i>Congestion at various locations in the town centre and associated air quality issues</i></li> <li>• <i>There are currently four Air Quality Management Areas in Ipswich</i></li> </ul>
	<i>The requirement for clean vehicle infrastructure to encourage uptake of technologies</i>	<ul style="list-style-type: none"> <li>• <i>The requirement for clean vehicle infrastructure to encourage uptake of technologies</i></li> </ul>
<b>Material Assets (including soil and waste)</b>	<i>The need to maintain and/or enhance soil quality</i>	<ul style="list-style-type: none"> <li>• <i>The need to remediate contaminated sites and avoid contamination.</i></li> <li>• <i>Very little high quality agricultural land remaining.</i></li> </ul>
	<i>The need to manage waste arisings in accordance with the waste hierarchy</i>	<ul style="list-style-type: none"> <li>• <i>The need to manage waste arisings in accordance with the waste hierarchy</i></li> </ul>
	<i>The need to encourage development on previously developed land and/or make use of existing buildings and infrastructure</i>	<ul style="list-style-type: none"> <li>• <i>The average percentage of housing built on previously developed land in Ipswich from 2001/02 to 2013/14 was 92.9%. In 2017/18, this had increased to 96.5%.</i></li> </ul>
	<i>The need to protect and enhance sites designated for their geological interest</i>	<ul style="list-style-type: none"> <li>• <i>The need to protect and enhance sites designated for their geological interest</i></li> </ul>
<b>Climatic Change, Flooding and the Coast and Estuaries</b>	<i>The need to ensure that the built environment adapts to the impact of climate change and extreme weather events</i>	<ul style="list-style-type: none"> <li>• <i>The need to increase renewable energy provision and deliver carbon neutral development.</i></li> <li>• <i>The need to ensure sustainable construction techniques and green</i></li> </ul>

		<i>infrastructure are employed to mitigate climate change and address fuel poverty.</i>
	<i>The need to address pluvial, fluvial and coastal flood risk</i>	<ul style="list-style-type: none"> <li>• Ipswich has a Flood Defence Management Strategy including a tidal surge barrier which has been built</li> <li>• In addition, as part of the final draft Local Plan, a refresh is being prepared of the Ipswich Strategic Flood Risk Assessment (SFRA)</li> </ul>
	<i>The need to manage pressure on protected sites</i>	<ul style="list-style-type: none"> <li>• Large areas protected for species and habitat value which come under pressure from increased recreational and tourist activity</li> </ul>
<b>Biodiversity</b>	<i>The need to conserve and enhance biodiversity (including sites designated for their nature conservation value)</i>	<ul style="list-style-type: none"> <li>• Numerous protected species, habitats and sites across the borough and pressures on climate biodiversity arising from climate change and urban development.</li> <li>• Need to extend and enhance the green infrastructure network across the whole IHMA.</li> </ul>
	<i>The need to halt biodiversity net loss</i>	<ul style="list-style-type: none"> <li>• High biodiversity value.</li> </ul>
<b>Cultural Heritage</b>	<i>Maintaining and enhancing designated and non-designated heritage and cultural assets</i>	<ul style="list-style-type: none"> <li>• High number of heritage assets</li> </ul>
<b>Landscape</b>	<i>The need to ensure the protection and enhancement of local distinctiveness and character</i>	<ul style="list-style-type: none"> <li>• Managing development while protecting significant areas of environmental protection.</li> <li>• Delivering high quality design that respects local character.</li> </ul>
	<i>The need to manage pressure from new development on the AONB</i>	<ul style="list-style-type: none"> <li>• Some AONB areas in Ipswich</li> </ul>
<b>Economy</b>	<i>The need to support and maintain a sustainable local economy</i>	<ul style="list-style-type: none"> <li>• Competition for land from housing.</li> <li>• Full-time female workers earn a third less than full-time male workers in Ipswich.</li> <li>• Promoting growth in key employment sectors.</li> </ul>
	<i>Enhancing town and service centres and their role</i>	<ul style="list-style-type: none"> <li>• Changing nature of the high street, local and district centres and changing shopping habits.</li> </ul>

<b>Transport and connectivity</b>	<i>Reducing the need to travel</i>	<ul style="list-style-type: none"> <li>• <i>Co-location of services</i></li> </ul>
	<i>Encouraging the use of sustainable transport modes</i>	<ul style="list-style-type: none"> <li>• <i>Improving the walking and cycling environment, lack of integrated public transport and relatively cheap car parking.</i></li> <li>• <i>Provision of adequate public transport infrastructure</i></li> </ul>
<b>Digital Infrastructure</b>	<i>The need to realise opportunities for social inclusion through the provision of improved online services</i>	<ul style="list-style-type: none"> <li>• <i>Access to fast broadband and wifi across the town.</i></li> <li>• <i>Unreliable mobile phone coverage in some areas</i></li> </ul>
	<i>The need to support the growth of the digital economy</i>	<ul style="list-style-type: none"> <li>• <i>Access to fast broadband and wifi across the town.</i></li> </ul>

# Part B: The Strategy

## CHAPTER 6: Vision and Objectives

### 6.1 Introduction

- 6.2 It is vital that the Ipswich Local Plan is led by a vision and a series of objectives that link appropriately to wider aims for the Borough and beyond.
- 6.3 It is also important that the vision and objectives are specific to Ipswich and are not entirely bland statements that would be suitable for any urban area in the country.
- 6.4 The Core Strategy is central to this process and should provide a strategic vision and strategic objectives that the rest of this document and others within the Local Plan should be in conformity with. Part D sets some targets for measuring the success of the suggested objectives.
- 6.5 The rest of this chapter is divided into three sections: the Vision, the Objectives and the Spatial Strategy.
- 6.6 With regard to the Objectives there is a clear inter-relationship between them and many of the policies in Chapter 8 of this document. This inter-relationship is explained where appropriate within Chapter 8.

## THE VISION

- 6.7 Our Vision is to improve the quality of life, health and well-being for all who live in, work in, learn in, play in and visit Ipswich, by supporting growth and ensuring that development happens in a sustainable manner so that the amenities enjoyed by local people are not harmed and the town is enhanced.

By 2036, Ipswich town centre will embrace a greater mix of uses providing opportunities for shopping, leisure and cultural activities, learning, working and living. The town centre, Waterfront and Portman Quarter will provide a range and choice of higher density homes to meet needs including on a redeveloped Island Site, whilst recognising that not everyone wishes to live in a flat. The Princes Street corridor will be a busy office quarter providing modern, flexible Grade A floorspace. Movement around the town centre will be easiest by foot and cycle, using an integrated network of safe, convenient and attractive routes, supported by a high-quality public transport network. The town centre will be inclusive, addressing the needs of the less mobile within a high quality public realm.

Outside central Ipswich, thriving district and local centres will provide local shopping, leisure and services close to people's homes and be at the hub of strong and cohesive communities. Three new neighbourhoods will be completed at Ipswich Garden Suburb with housing delivered alongside a country park and highway, water, energy, education, green and health infrastructure.

By 2036, a range of new homes will be provided across the Borough and within the Housing Market Area to meet needs. The Ipswich economy will have grown hand in hand with the skills and knowledge of the local workforce, providing opportunities for all as part of a strong and prosperous Ipswich Functional Economic Area supported by a successful university. Growth will be supported by modern, fit for purpose infrastructure, and Ipswich will be well connected and offer a range of sustainable transport modes to all its users. Future development will be adaptable to the implications of climate change impact.

The distinctive network of beautiful parks and open spaces, green infrastructure and open water will be protected and enhanced, to support their use by people and wildlife. The town's tree canopy will be extended and opportunities taken to enhance biodiversity and adapt to climate change. The town's built, natural and historic environments will be conserved and enhanced and growth will respect the character and distinctiveness of neighbourhoods within Ipswich.

The Ipswich of 2036 will have grown and changed in ways that respect the past and look to the future; it will be a county town that everyone in Suffolk will feel proud of.

## THE OBJECTIVES

6.8 The following twelve strategic objectives will guide the Local Plan

1. **STRATEGIC WORKING** - To work with other local authorities in the Ipswich Strategic Planning Area and with community partners to ensure a coordinated approach to planning and development.
2. **GROWTH** - At least (a) 8,010 new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2018 and 2036 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 9,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Strategic Planning Area between 2018 and 2036.
3. **THE DISTRIBUTION OF DEVELOPMENT** - The development of the Borough should be focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb, the Northern End of Humber Doucy Lane and within and adjacent to identified district centres (these areas are identified on the key diagram).
4. **SUSTAINABLE DEVELOPMENT** - Development must be sustainable, environmentally friendly and resilient to the effects of climate change.
5. **AIR QUALITY** - Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.
6. **TRANSPORT AND CONNECTIVITY** - 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 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 Portman Quarter 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, integrated cycle routes should be provided; and
  - Ipswich Borough Council aspires to an enhanced public transport system.
7. **RETAIL AND CULTURAL OFFER** – To enhance the vitality and viability of the town centre and district centres in response to changing consumer habits.
8. **DESIGN AND HERITAGE** - A high standard of design will be required in all developments. Development should conserve and enhance the historic environment of Ipswich, including historic buildings, archaeology and townscape.
9. **NATURAL ENVIRONMENT** – To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use.

10. COMMUNITY FACILITIES AND INFRASTRUCTURE – To retain and provide high quality and sustainable education, health and sports facilities and other key element of community infrastructure to meet local demand.
11. INEQUALITY – To tackle deprivation and inequalities across the town and create a safer more cohesive town.
12. DIGITAL INFRASTRUCTURE – To improve digital infrastructure provision.

## 6.9 Spatial Strategy - How will the vision and objectives be achieved?

- 6.10 The spatial approach to delivering sustainable growth in Ipswich is to pursue a strategy of urban renaissance in central Ipswich (policy CS2). This continues a well established approach in the Borough that has seen a transformation of the Ipswich Waterfront, and the beginnings of change to a more vibrant mixed use area in the Portman Quarter (formerly Ipswich Village). It offers the most sustainable way to accommodate growth in Ipswich, because:
- it makes the best use of previously developed land;
  - it places new residents in close proximity to jobs, shops, leisure and cultural facilities and public transport nodes, to support sustainable lifestyles;
  - it regenerates some of the more run down areas that surround the historic core;
  - it enhances the vitality and vibrancy of the central area, reinforcing its role as a county town and regional centre; and
  - it addresses social needs by tackling issues of social and economic deprivation.
  - It recognises the need for lower density family housing
- 6.11 The strategy also reflects Ipswich's role as the County Town, to help address issues of social and economic deprivation and in places a poor quality physical environment and social infrastructure.
- 6.12 Focusing development into central Ipswich will contribute to tackling issues of deprivation and improving social inclusion, for example through locating jobs and services where they will be most accessible. In pursuing the strategy, the Council will work with community partnerships to ensure that the benefits of growth reach deprived neighbourhoods. There are already in existence examples of such joint working, through initiatives such as ActivLives.
- 6.13 Much of the central area of Ipswich alongside the river is classified by the Environment Agency as Flood Risk Zones 2 and 3. National policy (National Planning Policy Framework) requires a sequential approach to the location of development such that Flood Zones 2 and 3 are avoided if there are viable alternatives. In exceptional circumstances 'more vulnerable' development, such as housing or education development in Flood Zones: 2 and 3 may be possible if 'within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and development is appropriately flood resilient and resistant, including safe refuge, access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems'<sup>2</sup> (the Exception Test).
- 6.14 Ipswich is constrained by its tightly drawn borough boundary. The Borough has already accommodated significant post-war growth such that there are few opportunities for further expansion at the periphery. Thus, as well as the need for urban regeneration in central Ipswich, there is no realistic alternative to locating some development in Flood Zone 3.

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<sup>2</sup> National Planning Policy Framework

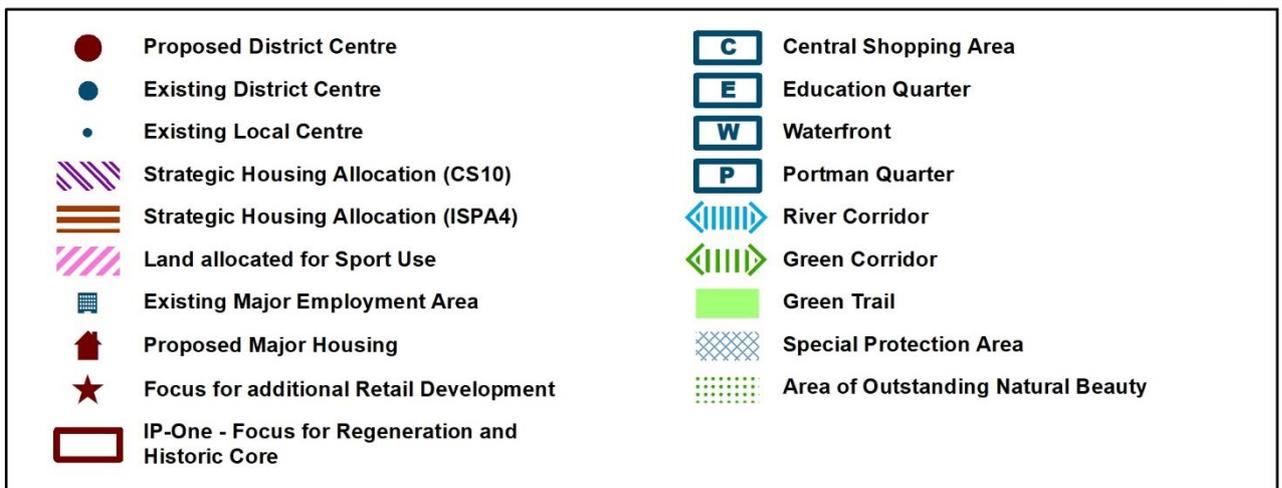
- 6.15 There is in place an agreed Ipswich Flood Defence Management Strategy and work to replace and raise the height of the floodgates in the Wet Dock lock is now complete.
- 6.16 The flood defence strategy will reduce flood risk significantly. However the residual risks resulting from the possibility of overtopping, breach or failure of gates or walls need to be considered. All development needs to be safe and when 'more vulnerable' developments need to be sited in Flood Zone 3a, they should pass the sequential and exception tests described in the NPPF. The Council's Level 2 Strategic Flood Risk Assessment (SFRA) was revised in 2019. It provides guidance on residual flood risk both for the situation before and after completion of the flood barrier. The SFRA also suggests a framework for safe development. The safety framework is detailed in the Council's Development and Flood Risk SPD (September 2013) which is in the process of being updated and includes requirements for:
- Structural safety of buildings;
  - Emergency plans for actions by emergency responders;
  - Emergency plans for evacuation and flood warning arrangements for users of buildings;
  - Temporary refuges;
  - Safe emergency access for Fire & Rescue Service;
  - Safe access/escape routes for building users;
  - Raised floor levels; and
  - Flood resilience measures.
- 6.17 Thus, a significant number of Ipswich's new homes will be provided within central Ipswich through sites that will be identified in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. As a secondary source of sites, land in the remainder of the urban area will also be identified, where possible located so as to provide ready accessibility for residents to existing local or district centres. Alongside the focus on the central area, the delivery of a significant number of homes through a sustainable urban extension on greenfield land at the Ipswich Garden Suburb will also occur during the plan period (see policy CS10). A cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, is also identified in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road. The allocation will be joint master planned with East Suffolk Council who has allocated land adjoining the Ipswich Borough boundary adjacent to the allocation within the Borough. This joint approach will help enable land within Ipswich Borough to come forward for housing.
- 6.18 Ipswich is a regional town centre. Through the Local Plan, the Council will:
- Amend the Central Shopping Area boundary to provide for improved retail offer (sites for new retail development are allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document);
  - Define the town centre boundary and identify within it employment areas and sites for offices, hotels, and commercial leisure uses (again, sites will be identified in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document);
  - Support the growth of the University of Suffolk and Suffolk New College, e.g. by protecting the Education Quarter land and buildings for linked uses; and
  - Support cultural and leisure facilities in the centre to attract visitors into the centre.

- 6.19 In July 2015 a non-statutory document entitled 'The Vision for Ipswich: East Anglia's Waterfront Town' was published by partners –the University of Suffolk, New Anglia Local Enterprise Partnership, Suffolk County Council, Ipswich Central, Ipswich Borough Council, Ben Gummer MP and the Ipswich Chamber of Commerce. 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, because they relate to matters beyond the remit of the planning system (e.g. starting works on the I-Am Project around the Museum on High Street). The two documents (the statutory 'Local Plan' and the 'Vision for Ipswich') are considered to complement each other in a helpful way.
- 6.20 Ipswich is a key economic driver in the wider sub-region. Whilst the town centre is the hub of office-based activity, retail and leisure activity, and offers the opportunity for clusters to develop around the University Campus, and Ipswich Port is a focus for storage and distribution linked to marine trade, land is needed across the Borough to enable the provision of a range of new jobs across employment growth sectors. The Core Strategy sets out an approach to protecting employment sites and employment areas across the town to meet a variety of needs. Employment land allocations themselves will be made through the site-specific development plan document (see Core Strategy policies CS13 and DM33, and Site Allocations policy SP5).
- 6.21 The Core Strategy will also provide an opportunity to attract national and regional voluntary sector organisations to form a base in Ipswich, and promote the growth of social enterprise incubator units and voluntary sector activity.
- 6.22 Although the town centre is the focus for regeneration, many of the town's existing residents live in the suburbs. The town centre improvements will benefit those who use the centre, and efforts to encourage modal shift will support accessibility around the Borough by public transport, cycling and walking. In suburban neighbourhoods benefits from growth could include additional jobs provided in the established employment areas, the provision of additional community facilities and urban greening.

## CHAPTER 7: The Key Diagram

- 7.1 A key diagram is an important part of the Core Strategy and Policies document. It diagrammatically illustrates on a not-to-scale map of the town the spatial strategy set out within Chapter 6 of the document.
- 7.2 The key diagram illustrates on a simple base map:
- (i) The IP-One Area Action Plan area and, within it, the Portman Quarter, Waterfront and Education Quarter (policy CS3);
  - (ii) Key development locations identified including IP-One, and the District and Local Centres (from policy CS2);
  - (iii) The approach to Ipswich Garden Suburb as the location of development to 2036 (from policy CS10);
  - (iv) The cross-border allocation for future development, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, proposed at the northern end of Humber Doucy Lane through policy ISPA4; and
  - (v) The ecological network, green corridor and green trail approach to strategic green infrastructure (policy CS16).

DIAGRAM 3: The Ipswich Key Diagram



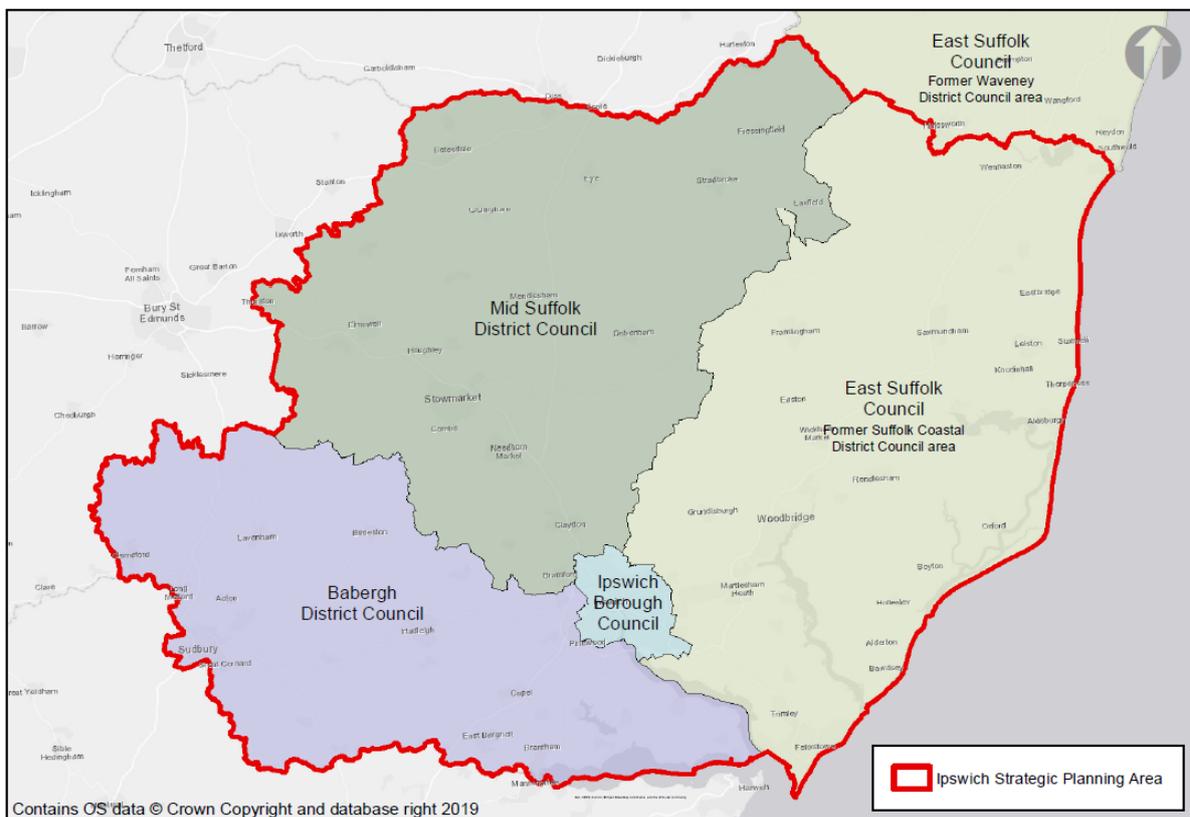
## CHAPTER 8: The Spatial Strategy

- 8.1 The development of a spatial strategy is a vital component of this document and is central to the Council's Local Plan. It will form the basic framework that will guide the contents of the rest of the Local Plan.
- 8.2 This chapter is divided into seven sections. The first provides **the sub-regional context for the planning of Ipswich**, based on an approach across the Ipswich Strategic Planning Area. Following this is a **strategic spatial approach to the development of the town**; the next four relate to the components of **'live, work, learn and play'**, and the final section relates to **infrastructure** to support growth and development.

### The Ipswich Strategic Planning Area

- 8.3 Through this Local Plan, the ambition for Ipswich is to boost economic growth and housing delivery, to meet needs, unlock potential and support cohesive communities. However, Ipswich as the county town sits within a wider area, which demonstrates strong functional relationships. This wider area includes Mid Suffolk and Babergh Districts and the former Suffolk Coastal District element of East Suffolk Council, which all border Ipswich. Evidence produced as part of the production of the Local Plan demonstrates that the four authorities together form the Ipswich Housing Market Area and the Ipswich Functional Economic Area. The area has strong connections in terms of travel to work patterns and housing and commercial markets. The area is shown on the map below.
- 8.4 The four authorities, along with Suffolk County Council, have a history of working together on strategic planning issues through the former Ipswich Policy Area Board (now the Ipswich Strategic Planning Area Board or ISPA Board). The ISPA Board provides a mechanism for the five authorities to develop, promote and deliver a vision for the Ipswich Strategic Planning Area and to co-operate on the preparation and monitoring of Local Plans and to share relevant evidence. This joint working is a fundamental part of planning in the area.

Map 2 Ipswich Strategic Planning Area



- 8.5 The Councils have worked together on evidence relating to housing and employment needs and landscape sensitivity and all authorities have recently published evidence relating to retail and commercial leisure needs.
- 8.6 Under the 2011 Localism Act, local planning authorities are required to co-operate on strategic planning matters. The strategic planning matters within the Ipswich Strategic Planning Area cover a range of issues including housing need and distribution, provision of land to support economic growth and delivering green infrastructure. In recognition of these interdependencies, the authorities have closely aligned their timetables for the production of Local Plans. The policies in this section are based upon the recognised common strategic matters, and establish Ipswich Borough Council's commitment to joint working.
- 8.7 Joint or aligned approaches are also necessary to help Ipswich Borough meet future development needs, as the Borough is under-bounded. This means that choices about directions for growth at the edge of the town within the Borough boundary are limited. A cross boundary approach is the starting point to ensure that development required to meet local needs is provided in a planned and coordinated way, in the right locations, and creates successful places.
- 8.8 The five ISPA authorities, in reflection of the changes to the National Planning Policy Framework, are working together on the production of a Statement of Common Ground to document the joint working and agreements in relation to strategic matters, which will evolve over the course of production of Local Plans.

### **Scale and location of growth**

- 8.9 On 24<sup>th</sup> July 2018, the Government published the revised National Planning Policy Framework. It introduces a standard method for calculating housing need based on the latest published household projections and applying an uplift based upon published ratios of median house prices to median workplace earnings (the 'affordability ratio'). This has since been updated in the February 2019 NPPF and the subsequent Planning Practice Guidance (PPG), 'Housing and Economic Needs Assessment (22 July 2019) which provides detailed workings of the Government preferred method. However, using the current standard method and based on the household projections published by the Government in September 2019 and the affordability ratio published by the Office for National Statistics in April 2019, the current figures equate to a need for 35,334 dwellings across the Housing Market Area to reflect the housing figures as calculated using the 2014-based household projections and the 2018 affordability ratio published in March 2019. Table 8.1 below shows the figures and, for comparison purposes, the housing need as identified through the Government's Right Homes, Right Places consultation in 2017.
- 8.10 The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-

Table 8.1 – Objectively Assessed Housing Need across the Ipswich Housing Market Area based on the standard method

	SHMA annual	SHMA total (2014-2036)	Standard method annual (Sept 2017)	Standard method total (2016 – 2036)	Standard method annual (2016-based)	Standard method total (2016-based) (2018-2036)	Standard method annual (2014-based)	Standard method total (2014-based) (2018-2036)	Standard method annual (2014 based, 2018 ratios)	Standard method total (2014 based, 2018 ratios, 2018 – 36)
<b>Babergh</b>	355	7,820	439	8,780	420	7,560	420	7,560	420	7,560
<b>Ipswich</b>	519	11,420	442	8,840	479	8,622	445	8,010	445	8,010
<b>Mid Suffolk</b>	452	9,951	573	11,460	590	10,620	585	10,530	556	10,008
<b>Suffolk Coastal</b>	460	10,111	495	9,900	582	10,476	515	9,270	542	9,756
<b>Total</b>	1,786	39,302	1,949	38,980	2,071	37,278	1,965	35,370	1,963	35,334

Note: the Babergh figure of 420 p.a. includes the application of a cap on the uplift, as allowed for by the methodology.

- 8.11 The standard method forms an appropriate starting point for identifying a housing requirement. The starting point for each authority will be to meet their own needs within their own boundary. Policy CS7 sets out the housing requirement identified for Ipswich Borough and how it will be met. The ISPA Statement of Common Ground identifies circumstances that would trigger a Local Plan review in relation to any ISPA authority's ability to meet its own housing need.
- 8.12 The authorities also jointly commissioned a Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) which identified needs for Gypsy and Traveller provision as follows:

Table 8.2 – Needs for Gypsy and Traveller accommodation in the IHMA

	Needs for permanent Gypsy and Traveller pitches <sup>3</sup> (2016 – 2036)
Babergh	1
Ipswich	27
Mid Suffolk	9 – 30
Suffolk Coastal	15
IHMA	52 – 73

- 8.13 The starting point for each authority will be to meet the needs within their own areas.
- 8.14 The authorities jointly commissioned the production of the Employment Land Needs Assessment, and the subsequent Economic Area Sector Needs Assessment, to identify the needs of the different employment sectors and the associated land requirements. This evidence demonstrates that the area functions as one Functional Economic Area and that there are distinct economic geographies within the area namely:

<sup>3</sup> A pitch is an area on a site developed for a family unit to live.

- Felixstowe / A14 corridor
- Wider Ipswich Market Area
- A140 corridor
- Rural and agricultural

8.15 The baseline jobs growth and employment land requirements are as shown in Table 8.3 below. They have been adjusted from the study figures to update to a 2018 baseline for the Local Plan Review. It should be noted that the baseline jobs growth for Ipswich has been re-adjusted to reflect the 2017 East of England Forecasting Model (EEFM), contrary to the 2016 EEFM used in the Preferred Options Local Plan and as adopted by the other IFEA authorities. This is because the 2017 EEFM identified a forecast jobs requirement of 9,318 jobs between 2018 – 2036, equivalent to a 40% reduction compared to the 2016 EEFM jobs forecast of 15,577 jobs. In contrast, the forecast jobs growth for the other authorities in the IFEA are not significantly affected by this update to the evidence base.

Table 8.3 – Baseline jobs growth and employment land requirements in the ISPA

	Baseline jobs growth (2018-2036)	Minimum employment land requirements (B1, B2 and B8 uses) (2018 – 2036)
Babergh	2,970	2.3ha
Ipswich	9,500	23.2ha
Mid Suffolk	5,270	7.7ha
Suffolk Coastal	6,500	11.7ha
IFEA	24,060	44.9ha

8.16 Evidence of needs for retail and commercial leisure has been produced for Ipswich and Suffolk Coastal, and for Babergh and Mid Suffolk. This evidence supports the continuing role of Ipswich as the county town and provides quantitative requirements for comparison shopping (non-food) and convenience shopping (food) over the plan period. Ipswich Borough Council has commissioned an update of the retail element of this evidence base, the results of which will inform Policy CS14.

**Policy ISPA1 Growth in the Ipswich Strategic Planning Area**

**Ipswich will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area (ISPA), whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Ipswich Borough Council Local Plan will contribute to:**

- a) The creation of at least 9,500 jobs through the provision of at least 23.2ha of employment land within Ipswich to contribute towards the Ipswich Functional Economic Area;**
- b) The collective delivery of at least 35,334 dwellings across the Ipswich Housing Market Area 2018-36; and**
- c) Supporting the continued role of Ipswich as County Town.**

**The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.**

Infrastructure

8.17 Within the Ipswich Strategic Planning Area there are aspirations towards the delivery of a number of key infrastructure projects, and in addition, there will be cross boundary infrastructure that is required as a result of growth planned within Local Plans.

8.18 The provision of new and improved infrastructure is essential to ensure that the growth planned across the area is sustainable. Planning for infrastructure across the area will include schools, sustainable transport measures, improvements to the A12 and A14, improvements to other parts of the road networks and the railways. In addition to infrastructure requirements directly linked to

planned growth, there are other cross-boundary projects that would help to grow and improve the economy and quality of life for the area.

- 8.19 In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the longer term. The route would improve connectivity between the A14 and A12, reducing pressure on the A14 and improving network resilience, especially near the Orwell Bridge and Copdock interchange. Suffolk County Council consulted on Ipswich Northern Route Options between July to September 2019, which assessed three indicative broad routes. Ipswich Borough Council resolved at the Executive Committee meeting of 3 September 2019 to indicate a general support to the project from the Borough Council and to suggest a strong preference for the inner route. The Council fully supports the ongoing work of Suffolk County Council in considering potential options for routes, and it is expected that the next review of the Ipswich Local Plan (along with other Local Plans in the Ipswich Strategic Planning Area) will consider the implications of any decisions made about routes in more detail, including the extent to which the options might support potential future scenarios for housing and employment growth beyond that which is being planned for within this Local Plan.

#### **Policy ISPA2 Strategic Infrastructure Priorities**

**The Council will work with partners such as the other local planning authorities in the ISPA, Suffolk County Council, Clinical Commissioning Groups, utilities companies, Highways England and Network Rail in supporting and enabling the delivery of key strategic infrastructure, and in particular the timely delivery of:**

- a) A12 improvements;**
- b) A14 improvements;**
- c) Sustainable transport measures in Ipswich;**
- d) Improved cycle and walking routes;**
- e) Appropriate education provision to meet needs resulting from growth;**
- f) Appropriate health and leisure provision to meet needs resulting from growth;**
- g) Improvements to water supply, foul sewerage and sewage treatment capacity; and**
- h) Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses.**

**The Council also supports work to investigate the feasibility of an Ipswich Northern Route and the provision of increased capacity on railway lines for freight and passenger traffic, but these are not measures needed to enable the delivery of growth proposed through this Local Plan.**

#### Protection of the environment

- 8.20 Suffolk contains extensive areas of nationally and internationally protected landscapes and habitats. A particular issue is the need to ensure that new development does not result in harm to the integrity of internationally designated Special Protection Areas, Special Areas of Conservation, Ramsar sites and the Suffolk Coasts and Heaths AONB. Strategic projects may require joint working by public bodies to ensure the requirements of the Birds and Habitats Directive are met.
- 8.21 Local authorities in the ISPA have been working collectively on the Recreational Avoidance and Mitigation Strategy (RAMS) to mitigate the pressure caused by new developments on these designated sites. The partnership work, supported by Natural England, has established a strategy to mitigate the impacts and is due to be supported by a Supplementary Planning Document that will provide further details in respect of cost implications and subsequent implementation.
- 8.22 Many of the European designated sites cross administrative boundaries and experience visitor pressure from residents and visitors. The collaborative approach is therefore required to ensure that green infrastructure requirements are considered across the wider area in a consistent manner.

**Policy ISPA3: Cross-boundary mitigation of effects on Protected Habitats and Species**

The Council will continue to work with other authorities to address the requirements of the Recreational Avoidance and Mitigation Strategy and implementation of mitigation measures for the benefit of the European protected sites across the Ipswich Strategic Planning Area.

The Council will continue to work with other authorities over the plan period to ensure that the strategy and mitigation measures are kept under review in partnership with Natural England and other stakeholders.

Delivering development at the Borough boundary

- 8.23 The under-bounded nature of Ipswich Borough means that there is little open countryside remaining on the edge of the town. The Council has reviewed these areas in order to comply with the NPPF and the commitment above to meet its own development needs as far as possible. A Strategic Housing and Employment Land Availability Assessment is available alongside this draft revised Local Plan which identifies all land the Council has reviewed for potential development.

**Policy ISPA4: Cross Boundary Working to Deliver Sites**

Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner. In order to meet housing needs within the Borough boundary as far as possible, the Council identifies a cross-border allocation for future development of 23.62ha of land within Ipswich Borough in 4 parcels forming ISPA4.1 for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. The allocation is shown on the accompanying site sheet for this policy. Development here will need to be appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure.

It will require land and infrastructure works and green infrastructure (including Suitable Accessible Natural Greenspace) on both sides of the Borough boundary in order to come forward. Development would be planned and delivered comprehensively, and would be master planned jointly with land within East Suffolk Council as identified through the Suffolk Coastal Local Plan. Development will include at least 30% affordable housing provision. The percentage and mix will be determined through the master planning process, having regard to policies CS8 and CS12 and the Suffolk Coastal Area Local Plan affordable housing requirement applied to the portion of the site falling within East Suffolk. New homes would be limited to south of the railway line and adjacent to the urban area. The design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings. Infrastructure requirements would include the following but may include other infrastructure which will be determined as part of the joint master planning process:

- a. Primary school places to meet the need created by the development;
- b. Replacement sports facilities if needed to comply with policy DM5;
- c. A layout and design that incorporates a 'green trail' walking and cycling route around the edge of Ipswich which also contributes positively to the enhancement of strategic green infrastructure to deliver benefits to both people and biodiversity and to help new developments deliver biodiversity net gain; and
- d. Transport measures including highway and junction improvements on Humber Doucy Lane and Tuddenham Road, walking and cycling infrastructure to link to key destinations including the town centre, and public transport enhancements.

- 8.24 One area where a cross-border allocation for future development has been identified is the northern end of Humber Doucy Lane adjacent to Tuddenham Road, where land was promoted through the previous Local Plan Review and again through the call for sites process in 2017. The indicative development capacity of the land within the boundary of Ipswich Borough Council is 496 dwellings. The site sheet ISPA4.1 in Appendix 3 of the Site Allocations DPD provides further information on this indicative capacity. In addition, the Suffolk Coastal Local Plan has allocated a site on the East Suffolk side of the Ipswich boundary. It is essential that the two authorities work together to provide a comprehensive approach to the land as planned development. Policy ISPA 4 identifies the likely impacts of the development which would have to be mitigated in relation to demand arising from potential residents such as transport infrastructure and sustainable transport initiatives to create potential for a substantial modal shift change and green infrastructure. As part of the master plan work, mitigation measures required that arise from demand created by the development will be reconsidered, including possibly the need for healthcare facilities.
- 8.25 The site is in close proximity to the Ipswich Garden Suburb (Policy CS10), a strategic allocation which is anticipated to deliver approximately 3,500 dwellings and other uses, including three new primary schools, largely over the course of the Local Plan period. Primary school capacity is a current constraint on development at Humber Doucy Lane coming forward, and it is anticipated that additional capacity can be provided through the planned new provision at the Ipswich Garden Suburb to ensure there is adequate provision for this development. This is anticipated to affect the timing of development coming forward.
- 8.26 Development in this allocation for future development will be required to deliver high quality design, which sensitively addresses adjacent countryside, biodiversity and existing dwellings. The development should also seek to preserve the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable.
- 8.27 A concentration of housing in this location is likely to require a bespoke Suitable Accessible Natural Greenspace (SANG) in addition to contributions towards the Recreation Avoidance Mitigation Strategy, to function as an alternative to the coast. As proposals for the site progress, consideration should be given to how the nearby SANG being delivered as part of the Ipswich Garden Suburb and wider footpath network, may be linked to any new SANG provision.'
- 8.28 The site allocation at the northern end of Humber Doucy Lane is located at the edge of Ipswich approximately 3.5km from the town centre. Sustainable transport connections will be key to providing linkage to employment and other opportunities. In addition, it is acknowledged that the transport mitigation measures required for the development of the site are challenging and it is essential that significant modal shift is delivered through strong travel plans and other sustainable measures.
- 8.29 The Council will outline expected infrastructure provision of both green infrastructure and built infrastructure required as part of the joint agreed master- planning process to the cross-border Humber Doucy Lane sites. The Whole Plan Viability Assessment for the Local Plan identifies that this area of land falls within a high value zone and indicates that approximately 30% affordable housing could be achieved on a greenfield development. This level of affordable housing also broadly aligns with the Suffolk Coastal Local Plan affordable housing requirement of 33%.
- 8.30 The above policies ISPA1 to ISPA4 replace the previous policy CS6 The Ipswich Policy Area.

## **A STRATEGIC SPATIAL APPROACH TO THE DEVELOPMENT OF THE TOWN**

8.31 This section sets out five strategic issues that will form the central component of the Ipswich spatial strategy - i.e. how and where growth is to be accommodated in order to deliver the Ipswich vision. These issues strongly influence the development of the content of the themed (live, work, learn and play) components of this Core Strategy and from there all the other components of the Local Plan

8.32 Five issues are addressed below. They are:

POLICY CS1:  
Sustainable Development

POLICY CS2:  
The Location and Nature of Development

POLICY CS3:  
IP-One Area Action Plan

POLICY CS4:  
Protecting our Assets

POLICY CS5:  
Improving Accessibility

POLICY CS6:  
The Ipswich Policy Area (policy deleted)

### **8.33 Sustainable Development**

8.34 Achieving more genuinely sustainable development in delivering growth is the key policy thrust of the plan. Sustainability considerations are diverse and need to be prioritised in all decisions relating to the location, form and design of development.

8.35 In the following policies, policy CS1 Sustainable Development covers the key areas of climate change and the presumption in favour of sustainable development; and policy CS4 Protecting our Assets covers the conservation of the built and natural environment and the use of natural resources.

8.36 Policies CS2 The Location and Nature of Development and CS5 Improving Accessibility set out the approach to locating development so as to maximise sustainable travel opportunities and to use land efficiently, taking into account existing and future flood risks.

8.37 The social and economic objectives of sustainable development are covered in subsequent policies relating to housing provision (see the 'Live' section) and employment provision (see the 'Work' section).

## POLICY CS1: Sustainable Development

- 8.38 Achieving sustainable development is the fundamental purpose of the planning system as defined through the National Planning Policy Framework and lies at the heart of the vision and objectives set out earlier in this plan. Sustainable development means meeting economic, social and environmental objectives in mutually supportive ways. The starting point for considering sustainable development is tackling climate change, because of the scale of the threat and the potential severity of its effects on ecosystems and human existence. It is required by national policy and it is also in the direct interests of a town with a central area situated on low-lying land on an estuary subject to tidal flooding.
- 8.39 The Council will plan positively for growth to meet objectively assessed needs and provide a flexible framework which can respond to rapid change.

### **POLICY CS1: SUSTAINABLE DEVELOPMENT**

**In Ipswich a comprehensive approach will be taken to tackling climate change and its implications through the policies of this plan.**

**When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively and jointly with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.**

**Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.**

- 8.40 The NPPF sets out the Government's approach to achieving sustainable development. Within it, paragraph 11 sets out the presumption in favour of sustainable development. The plan complies with the NPPF by setting out a framework of policies and proposals which plan positively for growth to meet the town's objectively assessed needs, whilst protecting areas and assets of particular importance. When considering development proposals, the Council will take a positive approach, supporting the presumption in favour of sustainable development except where proposals would compromise that presumption, as contained within the policies of the Local Plan and the National Planning Policy Framework.
- 8.41 The Local Plan needs to plan positively for development within the context of a changing climate. The NPPF requires the planning system to support the transition to a low carbon future and take a proactive approach to mitigating and adapting to climate change. There are many ways in which the Ipswich Local Plan can help to tackle climate change and ensure that Ipswich in 2036 will be more resilient to its effects. The current UK Climate Projections (UKCP18) forecast that the UK will continue to warm in future and more so in the summer than winter. The modelling shows an increased chance of milder, wetter winters and hotter, drier summers, along with an increase in the frequency and intensity of extremes. Sea level rise in London by 2100 is predicted to be 0.29-0.70m under a low emission scenario, and 0.53-1.15m under a high emission scenario. Planning responses include reducing greenhouse emissions from travel and buildings, addressing flood risk in locating and designing development, supporting the development of renewable and low carbon energy capacity, requiring sustainable drainage where appropriate and greening the town to provide shade and intercept heavy rainfall.

- 8.42 Policy DM1 in Part C of this document provides more detail as to how sustainable buildings can be delivered in Ipswich through the standards for energy and water use for residential development, and BREEAM ratings for non-residential development. The Plan is not prescriptive about how developers should achieve these targets. There is a significant amount of existing advice available about sustainable construction<sup>4</sup>.
- 8.43 The Planning and Energy Act 2008 allows local planning authorities to adopt policies which require developers to meet a proportion of their energy requirements from renewable or low carbon sources, and this is taken forward through policy DM2. The National Planning Policy Framework requires local planning authorities to support the move to a low carbon future and when setting any local requirements for a building's sustainability, to do so in a way consistent with the Government's zero carbon buildings policy and adopted nationally described standards.
- 8.44 Many buildings in Ipswich are at risk of flooding, some from tidal surges and many from heavy rain. This risk will continue to grow as a result of rising sea levels and increasingly heavy rainstorms that can overwhelm drainage systems and cause localised flooding unless mitigation measures are implemented. At the strategic scale, tidal flood risk has been addressed through the effective completion of the Ipswich Flood Defence scheme. However, developments located within the flood plain will still need to address residual risk in accordance with the National Planning Policy Framework (e.g. the risk of defences failing). Managing surface water run-off is also important. SuDS, rainwater harvesting, storage and where appropriate the use of green roofs or water from local land drainage will be required wherever practical. Such approaches shall be particularly mindful of relevant ecological networks. New buildings need to be more adaptable and resilient to climate change effects in future. This is taken forward through policy DM4.
- 8.45 Ipswich Borough Council and Suffolk Coastal District Council (now East Suffolk Council) published a cross boundary Water Cycle Study in January 2019. The study provides a high level assessment of water resources and supply infrastructure; waste water treatment, water quality and sewage; and flood risk. Ipswich is within an area of serious water stress and water companies will need to address a forecast deficit in the supply demand balance in the long term. In the medium to long term, Anglian Water has accounted for sufficient growth so as not to constrain development. In the short term, the phasing of new development needs to be appropriate so that it can be accommodated within the forecast supply demand balance and ties in with infrastructure upgrade timescales. Local Plans also need to support water efficient design. The study does not identify a need for additional wastewater recycling centre capacity in Ipswich. On flood risk, it concludes that an updated Strategic Flood Risk Assessment is needed to model the boundaries of Flood Zones 3a and b; drainage strategies should be prepared for all sites; and the sequential and exception tests need to be applied to all sites in flood zones 2 and 3. The Council's Strategic Flood Risk Assessment 2011 has been updated. The approach to flood risk and water infrastructure is addressed through policies CS17 and CS18, and DM4. Further guidance is contained in the Development and Flood Risk Supplementary Planning Document 2016.
- 8.46 The Ipswich Surface Water Management Plan was produced in 2012 and is currently under review. The action plan includes measures to reduce flooding, manage the consequences of flooding, or prevent increased flooding – e.g. by preventing obstruction of flood paths. It focuses on four catchments: London Road to Lavenham Road and Hadleigh Road, Ancaster Road/ Burrell Road, Lovetofts Drive to Lagonda Drive, and Worsley Close/ Ellenbrook Green. The resulting action plan proposes measures for alleviating flooding in these four areas and suggests ways to reduce the effects of 'urban creep' (paving of gardens, small extensions, etc.). Actions included the implementation of retrofit sustainable drainage systems, and maintenance such as gully clearing. Policy DM4

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<sup>4</sup> Examples include *By Design*, *CABE Building for Life*

addresses drainage within new developments and includes a requirement not to increase the risk of all forms of flooding.

- 8.47 Trees, woods and canopy cover as a whole can provide part of the solution to limiting climate change, and to helping society to adapt to the changes that we all face. On a global scale, we must protect and manage the canopy cover we already have as well as planting new canopy cover to “mitigate” climate change. CABE Space - ‘The benefits of urban trees’ states a 10% increase in green cover can potentially eliminate the effects of climate change on increasing surface temperatures. Forestry commission scientists also state a 4% increase of UK land planted with new woodlands over 40 years could be locking up 10% of the nation’s predicted greenhouse gas emissions by the 2050s.
- 8.48 There can be a multitude of benefits: for the climate, for people and for wildlife. Wood is a smart choice - timber is renewable and can replace other materials that require much larger fossil fuel inputs for their production. It can also replace fossil fuels directly in the form of renewable energy, or wood fuel. Trees can help Ipswich to adapt to a changing climate by intercepting rain in heavy rainstorms and to help alleviate flooding, moderate local microclimates – urban areas with trees are cooler in summer and warmer in winter, and help tackle the urban heat island effect, as well as creating a valuable wildlife habitat. Ipswich’s canopy cover and health care needs is changing. The Council aims to help the Borough’s canopy cover to adapt and become resilient to the changing climate. Canopy cover and arboriculture can be an important and attractive part of the solution in Ipswich and this is taken forward through policy DM9.
- 8.49 Trees are important in helping to keep rivers cool and therefore improving the state of the river for biodiversity. By providing shade, trees are able to moderate the extremes in water temperature which can be detrimental to fish spawning. Their underwater root systems provide valuable habitat to fish and invertebrates whilst stabilising the banks. Shading can also be helpful in the control of aquatic vegetation and well as bringing benefits for people. This is taken forward through policy DM10 Green Corridors.
- 8.50 Green spaces and functioning ecosystems help in adapting to the extremes of climate change. Green areas in the Borough have less of a heat island effect than built-up areas providing opportunities for people to keep cool in hot weather. Green spaces also improve air quality contributing to reduced ground-level ozone, fine particulates and respiratory irritants. Functional ecosystem can also mitigate the risks associated with downstream flooding from extreme rainfall events. In recent years there is also an upsurge in 'growing your own' food on allotments that helps reduce the miles food travels. From mitigating the effects of climate change to improving health, parks and green spaces play a vital part in Ipswich. Blue corridors in Ipswich, such as the River Gipping corridor, also support climate change resilience. Setting back urban development from watercourses, overland flow paths and ponding areas can create a mosaic of urban corridors designed to facilitate natural hydrological processes whilst minimising urban flooding, enhancing biodiversity and improving access to recreation. Open space protection and provision is taken forward through policies CS16, DM5 and DM6.
- 8.51 It is also inherently sustainable to keep historic buildings in use. Policy DM13 sets out the policy for proposals affecting built heritage.

8.52 This policy implements plan objectives 1 and 2.

## **POLICY CS2: The Location and Nature of Development**

- 8.53 The second vital element of sustainable development is meeting the need for development in locations where people can easily access the jobs, goods and services they want and need, by the most sustainable modes of travel. This benefits individuals by encouraging cycling and walking, which are cheap and healthy ways to get around. It benefits communities by enabling facilities to be accessed by as many people as possible and providing opportunities for people to meet. It benefits the environment and health by reducing vehicular emissions, and the economy by reducing congestion.

### **POLICY CS2: THE LOCATION AND NATURE OF DEVELOPMENT**

**The regeneration and sustainable growth of Ipswich will be achieved through:**

- a. Focusing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter (formerly Ipswich Village), and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development;**
- b. Allocating sites for future development at the northern end of Humber Doucy Lane for housing and associated infrastructure, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4);**
- c. Working with neighbouring authorities to address housing need and delivery within the Ipswich housing market area;**
- d. Focusing major new retail development into the Central Shopping Area with smaller sites identified in district centres;**
- e. Focusing new office, hotel, cultural and leisure development into Ipswich town centre;**
- f. Directing other employment uses (B1 (except office), B2 and B8) to employment areas distributed in the outer parts of the Borough, and there will be a town centre first approach to the location of offices;**
- g. Dispersing open space based (non-commercial) leisure uses throughout the town with preferred linkage to ecological networks and/or green and blue corridors, and protecting the countryside from inappropriate development; and**
- h. Development demonstrating principles of high quality architecture and urban design and which enhances the public realm, ensures the security and safety of residents and is resilient to climate change.**

**A sustainable urban extension to north Ipswich will be delivered subject to the provision of suitable infrastructure (see policy CS10 – Ipswich Garden Suburb).**

**Major developments within the town centre, Portman Quarter, Waterfront and district centres should incorporate a mix of uses to help achieve integrated, vibrant and sustainable communities. Major developments (for the purposes of this policy) are defined as commercial developments of 1,000 sq. m or more or residential developments of 10 dwellings or more. Exceptions may be made for large offices or education buildings for a known end user, or for residential use**

**where this would itself diversify the land use mix provided by surrounding buildings and complies with other policies of the plan.**

**In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise heritage assets and the historic character of Ipswich.**

- 8.54 This approach to the location of development is centred on the town centre (which includes the Portman Quarter – formerly called Ipswich Village - and the Waterfront), Ipswich Garden Suburb, the northern part of Humber Doucy Lane in the longer term and on the town's district centres. The strategy is illustrated in the key diagram. The exact boundaries of these areas will be defined on the policies map through the policies of this plan and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. The town centre, Portman Quarter and Waterfront will receive the highest densities of development in the town - including high-density housing developments. Medium-density and locally focused facilities would then be provided elsewhere in IP-One and within and around district centres, with lower density development elsewhere. Developments at higher densities will require special attention being paid to their urban design and greening qualities. Residential densities are defined in policy DM23.
- 8.55 This approach to the location of development enables multiple objectives to be achieved.
- It will maximise opportunities to re-use previously developed land within central Ipswich.
  - It will ensure that new housing is provided close to local shops and facilities that can be accessed by non-car modes, which contributes to reducing carbon emissions and supporting communities.
  - It will support the ongoing regeneration of central Ipswich and particularly of the Waterfront and town centre.
  - It will help to ensure the effective and efficient use of land through developing at appropriate densities according to the accessibility of the location.
  - It will create a sustainable Garden Suburb to help meet the housing needs of the Borough.
  - As development draws to a conclusion at Ipswich Garden Suburb, it will enable lower density housing development to be master planned jointly with East Suffolk Council at the northern end of Humber Doucy Lane, which will maintain and ensure separation between Ipswich and surrounding settlements.
- 8.56 This policy therefore implements objectives 4, 6 and 9.
- 8.57 The central urban focus to the location of development also reflects the sequential approach to site selection required by the National Planning Policy Framework (which encourages the use of previously developed land) and maximises the chances of making central Ipswich an increasingly vibrant and dynamic place. Chapter 6 of the plan sets out flood risk considerations.
- 8.58 Later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough's objectively assessed housing need.

- 8.59 The approach to locating employment uses focuses office activity into the town centre, in accordance with the National Planning Policy Framework, to support its vitality and viability. It directs other employment uses, particularly B2 and B8 uses, which tend to be more extensive and less suited to central locations, to the town's outlying employment areas. These are accessible from residential areas, yet sufficiently segregated from them to minimise the possibility of conflicts between residential uses and potentially noisy or odorous industrial activities. The boundaries of employment areas are delineated on the policies map.
- 8.60 Major developments within Ipswich town centre, Portman Quarter, the Waterfront and District Centres are required to include a mix of uses to help create more diverse neighbourhoods that can in turn contribute to the vibrancy of the town and district centres and reinforce a sense of place and distinctiveness. For example, including some residential uses within office areas helps to keep the areas populated after office hours. This in turn can encourage more shops and community uses to locate there creating truly mixed-use neighbourhoods. Living over shops is also a way to make more efficient use of buildings. Careful consideration is needed of mixed use developments, to ensure that housing is not juxtaposed inappropriately with other land uses. However, where development is for the use of a known, single large user, an exception may be made if it is demonstrated that mixed use would harm the viability of the scheme. This mixed-use approach will not apply in the identified employment areas of the town centre unless specified in site allocations.
- 8.61 The district centres referred to in the policy and identified in the key diagram are as follows (with reference numbers for cross reference to the policies map):
- Meredith Road (3)
  - Norwich Road (1-91, 2-110) / Bramford Road (7)
  - Hawthorn Drive (9)
  - Stoke Park (11)
  - Wherstead Road (13)
  - Cauldwell Hall Road / Woodbridge Road (418-785) (18)
  - Felixstowe Road (55-201, 120-190) (23)
  - Nacton Road (270-374) (28)
  - Ravenswood (47)
  - Woodbridge Road East (27-53) / Heath Road (17)
  - Sproughton Road / (to be developed)
  - Duke Street (48)
- 8.62 Ipswich Garden Suburb (see policy CS10) will also contain a district centre that would join the above list.
- 8.63 Within a 400m straight line distance from district centres, the Council would support the provision of identified community facilities (see Appendix 2). Within a wider zone of 800m, the Council would support in principle medium density housing provision to try to increase the proportion of people living near to shops and community facilities.
- 8.64 It should be noted that many of the centres above already have some of the community facilities mentioned within 400m of their centres. Zonal maps of the above centres are shown on Plan 1.
- 8.65 In dispersing open space across the Borough, where possible provision should be in low-lying areas needed for flood storage or conveyance.
- 8.66 Delivering high quality change, which safeguards the best of the town's urban character and neighbourhoods and secures positive improvements, is not just confined to the IP-One Area and Conservation Areas. The NPPF advises that sustainable development 'involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life'. To facilitate this, an Urban Character Study supplementary planning document has been adopted to define the environmental

characteristics of the Borough as a whole. Policy DM12 Design and Character addresses character and other key aspects of design and public realm, including urban greening, designing out crime, sustainable movement and accessible homes.

- 8.67 In expecting high quality architecture and urban design, it is important that new development ensures the impacts of climate change are mitigated and that, where appropriate, Secured by Design principles are adopted. Where deemed necessary, anti-terrorism measures for strategic sites should be incorporated.

## **POLICY CS3: IP-One Area Action Plan**

- 8.68 The spatial strategy for Ipswich continues to focus development to a significant degree on central Ipswich and particularly on the areas that ring the historic core and this is where many sites which need redevelopment are located. Therefore, the Council is retaining the area action plan for the area - known as IP-One - to guide its delivery. The Area Action Plan is incorporated into the Site Allocations and Policies Development Plan Document (DPD). The IP-One area has been defined by the Council. It is slightly larger than the town centre and includes the central shopping area, Portman Quarter (formerly Ipswich Village), the Waterfront and the Education Quarter. The IP-One area is indicated broadly on the key diagram. It is defined on the policies map.

### **POLICY CS3: IP-ONE AREA ACTION PLAN**

**The Council will prepare and implement an IP-One Area Action Plan incorporated in the Site Allocations and Policies Development Plan Document, to plan for significant change in central Ipswich and help to deliver the Ipswich Vision. The Area Action Plan will include policies which:**

- a. Define the extent of the Waterfront and the Portman Quarter (formerly Ipswich Village) and set out policy for development within them;**
- b. Allocate sites for development in IP-One;**
- c. Set down development principles which will be applied to new development within the Opportunity Areas identified on the IP-One Area inset policies map, unless evidence submitted with applications indicates that a different approach better delivers the plan objectives;**
- d. Define and safeguard the Education Quarter to support the development of the University of Suffolk and Suffolk New College;**
- e. Identify heritage assets which development proposals will need to have regard to and integrate new development with the existing townscape;**
- f. Define the Central Car Parking Core within which parking controls will apply;**
- g. Identify where new community facilities and open space should be provided within IP-One;**
- h. Provide a framework for the delivery of regeneration in IP-One and address the need for infrastructure, including the need for an additional access to the Island Site; and**
- i. Provide tree-planting and urban greening schemes, mindful of the ecological network, to improve the street scene and permeability for wildlife throughout the town centre.**

**Sites and designated areas within the IP-One area will be identified on a revision of the policies map to be prepared alongside the Development Plan Document.**

Area action plans are intended as a tool to guide development in areas where change is expected and/or conservation policies apply. IP-One includes both types of area, encompassing as it does the medieval core of the town, which now forms the focus for the Central Shopping Area; the Waterfront and Portman Quarter where regeneration activities are focused at present; and the Education Quarter where the University of Suffolk is located. The IP-One Area Action Plan builds on earlier work that resulted in the

publication of a non-statutory area action plan in 2003. The Opportunity Area development principles are identified through Chapter 6 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.

## **POLICY CS4: Protecting our Assets**

- 8.69 Ipswich has a rich and varied heritage of built, historic and natural assets, including more square miles of park per thousand population than anywhere else in the UK. The Borough contains:
- Over 600 listed buildings and structures;
  - 15 conservation areas;
  - A Ramsar Site and Special Protection Area for Birds (part of the Stour and Orwell Estuaries site);
  - 4 Sites of Special Scientific Interest – three for wildlife (two are different parts of the same area) and one for geology;
  - 20 County Wildlife Sites;
  - 8 scheduled monuments;
  - 3 County Geodiversity Sites
  - 2 Regionally Important Geological Sites
  - An ancient woodland;
  - An area of archaeological importance for remains of all periods in the historic core, particularly Anglo-Saxon deposits; and
  - 3 registered parks and gardens and 518 hectares of parks and open spaces.
- 8.70 There is also a list of Suffolk Priority Species and Habitats, which identifies species and habitats of particular importance to the county and Ipswich. A small part of the south-east of the Borough lies within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.
- 8.71 These assets help to make Ipswich the place it is and they make an important contribution to people's quality of life in the Borough. They may also have a wider national and international value and interest and, in the case of wildlife, play an important role in the function of complex ecosystems. Therefore, these valuable elements of the Ipswich asset base must be protected, enhanced and integrated sensitively with new development.
- 8.72 The Ipswich asset base also includes all the finite natural resources that the Borough depends on, such as minerals used in construction, land and soil itself. The National Planning Policy Framework recognises the prudent use of natural resources as a core objective of sustainable development. We therefore need to take opportunities to use natural resources more sparingly and efficiently, to re-use and recycle materials and to source materials locally where possible.

### **POLICY CS4: PROTECTING OUR ASSETS**

**The Council is committed to conserving and enhancing the Borough's built, heritage, natural and geological assets.**

**The Council will conserve, and promote the enjoyment of, the historic environment. To this end, it will:**

- i) conserve and enhance the character and appearance of conservation areas, by preparing and reviewing where necessary character appraisals and using them to guide decisions about development;**
- ii) review the extent of conservation areas and designate any new areas or amend boundaries as appropriate;**
- iii) conserve and enhance heritage assets within the Borough through the development management policies in this plan, the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of heritage assets of local importance, such as buildings or parks, and taking steps to reduce the number of heritage assets at risk;**

- iv) **Promote local distinctiveness and heritage assets through the publication and review of Supplementary Planning Documents (SPDs) including the Ipswich Urban Character SPD and the Development and Archaeology SPD; and**
- v) **Recognise the wider role heritage can play in regeneration, as a cultural, educational, economic and social resource.**

**The Council will also seek to protect and enhance local biodiversity, trees and soils in accordance with the National Planning Policy Framework and national legislation by:**

- a. **Applying full protection to international, national and local designated sites and protected and priority species;**
- b. **Requiring new development to incorporate provision for protecting and enhancing geodiversity interest and provide biodiversity net gain that is proportion to the scale and nature of the proposal. Reference should be made to the information and recommendations of the Wildlife Audit in relation to any proposals on, or that may affect, sites identified within it;**
- c. **Avoiding the loss of ancient woodland and ancient or veteran trees in accordance with national policy, and requiring new development to plant the veteran trees of the future using appropriate native species of local provenance;**
- d. **Supporting and securely funding the Greenways Project;**
- e. **Designating additional Local Nature Reserves where appropriate;**
- f. **Preparing and implementing management plans for Council owned wildlife sites;**
- g. **Identifying an ecological network across Ipswich and linking into adjacent areas, and protecting and enhancing it in accordance with policy DM8 to maximise the benefits of ecosystem services and provide net gains for biodiversity to enable delivery through development proportion to the scale of that development;**
- h. **Conserving and enhancing the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and requiring development to respond to local landscape sensitivity;**
- i. **Preventing the spread of non-native invasive species by ensuring that an appropriate biosecurity proposal is adopted; and**
- j. **Protecting and enhancing valued soils**

**The Council will encourage the use of local reclaimed, renewable, recycled and low environmental impact materials in construction, in order to conserve finite natural resources and minimise environmental impacts. New development will also be required to minimise the amount of waste generated during construction and through the lifetime of the building.**

8.73 Most of the built, heritage and natural assets are protected by one or more pieces of legislation, policy documents or circulars, including:

- EU Habitats Directive;
- EU Birds Directive 2009;
- Conservation of Habitats and Species Regulations 2017, as amended;
- Wildlife and Countryside Act 1981;
- National Parks and Access to the Countryside Act 1949;
- Countryside and Rights of Way Act 2000;
- Ramsar Convention on Wetlands;
- Hedgerows Regulation 1997;

- Plant Health Act 1967 and orders;
- Forestry Act 1981;
- Natural Environment and Rural Communities Act 2006;
- The Town and Country Planning Act 1990;
- Planning (Listed Buildings and Conservation Areas) Act 1990;
- Ancient Monuments and Archaeological Areas Act 1979;
- National Heritage Act 1983;
- The National Planning Policy Framework (2019) and Planning Practice Guidance (2014 and as updated);
- The Localism Act 2011; and
- Water Framework Directive.

8.74 This framework of legislation, guidance and policy currently provides comprehensive protection for the assets. The Council will take the following approach to heritage assets:

- Conserve and enhance the significance of the Borough's heritage assets, their setting and wider townscape in accordance with policy DM13;
- Require new development to contribute to local distinctiveness, built form and scale of heritage assets through the use of appropriate design and materials;
- Require regeneration proposals to demonstrate a clear understanding of the significance of the asset and its wider context, and the potential impact of the development on the heritage asset and its context;
- Keep under review potential buildings and structures for statutory protection; and
- Prepare and review entries for the joint Suffolk LPA Buildings at Risk register.

8.75 Local policy is also provided through policy DM13 Heritage Assets and Conservation. The National Planning Policy Framework sets out the Government's planning policies for England. This is supported by the National Planning Practice Guidance which is a web based resource published by Government, and also by the Good Practice Advice Notes (GPA) produced by Historic England in collaboration with the Historic Environment Forum. Historic England also publish Historic England Advice Notes on specific topic matters providing advice to those engaged in planning matters. The Council is preparing a supplementary planning document to protect the special local distinctiveness of Ipswich heritage assets (the Urban Character Supplementary Planning Document).

8.76 Conservation areas differ from listed buildings in that they are locally designated. Their designation is based on the particular character of the area and local planning authorities are encouraged to prepare character area appraisals and management plans for conservation areas as a tool to guide development management decisions. Therefore the policy will apply in conservation areas.

8.77 All conservation areas have been the subject of detailed Conservation Area Character Appraisals. Those for areas designated by 1994 were the subject of public consultation and Council approval during 1994-95. Subsequently four additional conservation areas were declared in 1995, 2003, 2005 and 2015, for which appraisals were also prepared. Periodic reviews of all conservation areas are required by heritage legislation and these have been undertaken at approximately five yearly intervals since 1994 involving a review of boundaries, the descriptive content of the appraisals and the area specific policies and proposals. The Local Plan anticipates major change in or adjacent to parts of the Central Conservation Area but this is not expected or proposed to the same extent for the remainder of conservation areas. Promoting heritage assets through development could, for example, include provision of heritage information around a site whilst archaeological assessments are underway.

8.78 The Orwell Estuary provides an important ecological network and landscape setting for Ipswich and helps define its history. It is characterised by its broad expanse of water and its gently rolling, wooded banks. Outside Ipswich Borough, much of the land on the banks of the river falls within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The transition between the built-up character of Ipswich and open countryside is

quite sharply defined around most of the present Borough boundary, with the transition from urban to rural appearance and uses being clearly appreciable. The Orwell Estuary will be covered by the South East Inshore Marine Plan when it is completed (consultation took place early in 2018). This will set out priorities and directions for future development within the plan area, inform sustainable use of marine resources, and help marine users understand the best locations for their activities, including where new developments may be appropriate. An South East Inshore and South East Offshore Marine Plan was adopted on 2<sup>nd</sup> April 2014 which covers an area adjacent to the Suffolk Coast north of the River Orwell. Early consultation with the Marine Management Organisation will be required where any work requiring consideration under the Marine Works (Environmental Impact Assessment) Regulations 2007 is to be undertaken. Proposals for development at the edge of the urban area should be informed by the Settlement Sensitivity Assessment (2018) which analyses the sensitivity of settlement fringes, their capacity to accommodate future development and priorities for the enhancement, protection, management and conservation of landscape areas.

- 8.79 For wildlife habitats, an ecological network approach has been adopted in accordance with the National Planning Policy Framework. Ecological networks are an effective way to conserve wildlife and biodiversity where habitats have become fragmented. They support its resilience to pressures such as urban development and climate change. The network includes internationally, nationally and local designated sites which are protected in accordance with the National Planning Policy Framework. Development in the vicinity of areas with nature / wildlife and geological designations must take into account the wider effects on those sites. The Council also recognises its biodiversity responsibility under the Natural Environment and Rural Communities Act 2006. This Act introduced the requirement for public bodies, in exercising their functions, 'to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. The Anglian River Basin Management Plan sets out measures which aim to achieve the water body status objectives and wider objectives of the European Water Framework Directive no deterioration of waterbodies and ultimately improving all water bodies to a good standard by 2027. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 require all public bodies, in exercising their functions so far as affecting a river basin district, have regard to the river basin management plan for that district.
- 8.80 Ipswich will see significant new building over the plan period. It is therefore essential that opportunities be taken through development to provide net gains in biodiversity and green infrastructure. Proposals should demonstrate how the development would contribute towards new green infrastructure opportunities or enhance the existing green infrastructure network as part of the development. New development must also secure ecological enhancements as part of its design and implementation, and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal. This could include green roofs or walls for insects and birds, wood piles for beetles, integrated nest boxes for birds, and in ecological networks can increase permeability of wildlife in new development through biodiversity enhancements. Therefore the policy will apply to all new developments in the Borough. Development at the Ipswich Garden Suburb will provide an opportunity to contribute to biodiversity. Reference should be made to the information and recommendations of the Wildlife Audit in relation to any proposals on, or that may affect, sites identified within it.
- 8.81 The Stour and Orwell Estuary Special Protection Area is protected under the Birds Directive due its importance for bird populations. The plan has been subject to an Appropriate Assessment under the Habitats Directive. This concluded that visitor numbers to the Orwell Estuary will increase as a result of growth in the Ipswich Strategic Planning Area and could adversely affect the Estuary's Special Protection Area for birds. Measures to avoid and mitigate any such potential impacts are included in the plan. There are also large areas of Inshore Marine Special Protection Area extending eastwards from the Suffolk and Essex Coast, which form part of the marine protected area identified in the South East Inshore and South East Offshore Marine Plan.

- 8.82 Scheduled Monuments are designated by the Secretary of State for Digital, Culture, Media and Sport under the Ancient Monuments and Archaeological Areas Act, 1979. Historic England administers and manages the scheduling and Scheduled Monument Consent process and advises the Secretary of State in making decisions. Scheduled monuments can be found on the National Heritage List for England, which is searchable online. Proposals affecting designated and non-designated Ipswich heritage assets should be informed by the Historic Environment Record for Suffolk maintained by the County Council which is also consulted on planning applications that could affect archaeology. Ipswich's archaeological legacy is important in helping to tell the town's story and will therefore be protected and managed in accordance with the NPPF and policies CS4 and DM14. Central Ipswich is an Area of Archaeological Importance, for which a development management approach is set out in policy DM14. An Urban Archaeological Database for Ipswich has been prepared and the Council has prepared a Development and Archaeology supplementary planning document to summarise information from the Ipswich Urban Archaeological Database and set out archaeological considerations for new developments.
- 8.83 Living ancient monuments such as veteran and near veteran trees in the ancient stage of their life are of interest biologically, aesthetically and culturally because of their age. Ancient and semi-natural woodlands and veteran trees are irreplaceable habitats of high biodiversity value and must be protected from development that would result in damage to or loss of any of these features.
- 8.84 Historic England also has a role registering historic parks and gardens. Whilst registration offers no additional statutory protection, they are designated heritage assets of considerable significance and an important material consideration in development management. Decisions about proposed development which would harm the significance of a designated heritage asset will be taken having regard to the NPPF.
- 8.85 In addition to protected Listed historic buildings, there are many heritage assets of local townscape interest (on 'local lists') that are not just confined to conservation areas but are located throughout Ipswich. Some of these heritage assets may be the main architectural landmarks of distinction in the local area. Many such heritage assets were designed during the 19<sup>th</sup> and 20<sup>th</sup> Centuries by local architects. Local authorities are encouraged to prepare inventories of such heritage assets and add these to the Historic Environment Record. It is government policy that these non-designated heritage assets should be taken into account when determining planning applications to ensure their retention so as to help maintain local distinctiveness and a sense of place. An Ipswich Local List dating from 1977 has been updated and adopted as a supplementary planning document in September 2013
- 8.86 All the designated sites or areas will be listed in the Site Allocations and Policies (incorporating IP-One Area Action Plan) plan document and will be identified on the policies map.
- 8.87 The Council acknowledges the important social and economic role that the historic environment can play, both for existing communities through heritage led regeneration and as part of new development proposals. It is important that the significance of the Borough's heritage assets is taken into account as part of any future regeneration and opportunities are sought, wherever possible to enhance the heritage assets.
- 8.88 Soils play an important role in both urban and rural areas. In line with the National Planning Policy Framework, the Council will protect and enhance valued soils because soil is an essential finite resource that provides important ecosystem services.
- 8.89 The Council will encourage the conservation and efficient use of natural resources in order to work towards sustainable 'one planet' living in Ipswich. This will be implemented through the development management policy DM1 in Part C of this document. Historic England

publishes advice on the application of Part L of the Building Regulations to historic and traditionally constructed buildings. In addition, new development will be required to minimise waste generated.

8.90 Policies for the protection of assets through the development management process are set out within Part C of this document.

8.91 This policy supports plan objective 1.

## **POLICY CS5: Improving Accessibility**

- 8.92 Ipswich is planning for growth and ways therefore need to be found to optimise the accessibility of new developments without increasing congestion. The town benefits from being relatively compact, which lends itself to cycling and walking and the provision of full fibre (to the premises) broadband (FTTP).
- 8.93 In addition, the transport sector is a significant source of carbon dioxide emissions, which need to be reduced as part of a comprehensive approach to tackling climate change. It is also responsible for the pollution in the Ipswich Air Quality Management Areas and therefore there are also potential health benefits to tackling vehicular emissions through a comprehensive approach to mobility and access. Therefore the following policy will be applied to all development.

### **POLICY CS5: IMPROVING ACCESSIBILITY**

**Development should be located and designed to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport (bus and rail). This will encourage greater use of these modes. The Council will work with the Highway Authority including through the Local Transport Plan and the Suffolk County Council Transport Mitigation Strategy, to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network.**

**The Council will support the expansion of electronic communications networks throughout the plan area as a means to support economic growth and enable home working, and thus reduce the need to travel.**

**The Council also recognises that some journeys will need to be made by car. The vitality and viability of the town centre depends on people being able to access it by a variety of modes. This will be managed through policies for car parking.**

**The Council will work with partners to promote the inclusive and age-friendly design of buildings, public spaces, highways and transport infrastructure.**

- 8.94 If people are to be encouraged to walk, cycle and use public transport, to help the town achieve environmental and health objectives, then developments must be located and designed such that these modes rival the car for cost and convenience. It is also important to ensure that routes are more pleasant in their surroundings such as along avenues or ecological networks, and that cycle and pedestrian routes are safe. Policy CS2 sets out the strategy for the location of development and refers to mixed uses in larger development proposals.
- 8.95 A package of sustainable travel measures known as Travel Ipswich has been completed in Ipswich, delivering the expansion and improvement of bus facilities; an Urban Traffic Management and Control system; a Real Time Passenger Information system; and a detailed programme of improvements to walk/cycle routes and crossings in and around the town centre. However, air quality, congestion and obesity continue to be issues within Ipswich and therefore efforts to increase and support sustainable travel choices, and reduce the need to travel, for example by home working, need to be sustained.
- 8.96 The Local Transport Plan is under review and provides the opportunity for the next package of sustainable travel measures to be identified and implemented. This will occur through the Ipswich Transport Strategy, the preparation of which has been identified by the County Council as a priority. Traffic modelling undertaken to inform the Local Plan Review has

supported the identification of measures needed across the Ipswich Strategic Planning Area to mitigate the traffic and air quality impacts of planned growth. These measures are included as appropriate in policy CS20. The development management policies in Part C of the plan ensure that accessibility is considered, and measures incorporated, in the context of new developments.

- 8.97 The Council is also developing a parking strategy which will address the quantity and quality of car and cycle parking provision in the town. The National Planning Policy Framework requires Councils to prioritise full fibre broadband connections to new and existing developments.
- 8.98 This policy is also aimed at ensuring the accessibility of the town centre and individual buildings and developments by everyone, including older people, people whose mobility is impaired and people with dementia. Planning can have a significant impact on the accessibility and inclusiveness of the built environment through the design of buildings and the public realm. The Planning Practice Guidance states that inclusive design can help older and disabled people live more independently, and benefit people with dementia (Inclusive Design section, June 2019). Policy DM12 provides the detailed policy for inclusive and accessible buildings and public spaces.

**POLICY CS6:  
The Ipswich Area Policy deleted**

## Live

8.99 The strategic planning of new homes is a key part of the Local Plan. This section addresses the strategic issues associated with delivering new homes.

8.100 It is divided into the following five policies:

POLICY CS7:  
The Amount of New Housing Required

POLICY CS8  
Housing Type and Tenure

POLICY CS9  
(policy deleted)

POLICY CS10  
Ipswich Garden Suburb (formerly Ipswich Northern Fringe)

POLICY CS11  
Gypsy and Traveller Accommodation

POLICY CS12  
Affordable Housing

8.101 These are addressed in turn below:

### **POLICY CS7: The Amount of Housing Required**

8.102 The Inspector's Report published in January 2017 after the examination of the last Ipswich Local Plan required the Council to undertake an urgent review, with neighbouring local planning authorities, of the amount of housing needed. The Council committed to this through the adopted 2017 Ipswich Local Plan, and the authorities jointly undertook a Strategic Housing Market Assessment. However, the Government has subsequently published a standard methodology for calculating housing need.

8.103 Joint working is taking place through the production of aligned local plans by Ipswich Borough Council, Babergh/ Mid Suffolk District Councils and East Suffolk Council for the Suffolk Coastal Local Plan area. This joint working has the support of the Ipswich Strategic Planning Area Board. A Statement of Common Ground has been published alongside this formal draft of the Ipswich Local Plan Review. Work is also ongoing on a Suffolk Framework for Growth, which the Council resolved on 6th March 2018 (report reference E/17/74) future versions of the Ipswich Local Plan would have regard to.

8.104 In July 2018, the Government published the revised National Planning Policy Framework (NPPF), which requires local planning authorities to use a standard method to quantify local housing need. The NPPF was further revised in February 2019 along with updated planning practice guidance. This advised that local planning authorities use the 2014-based household projections in their housing need assessments. The effect of this has been to reduce the housing need figure to 445 dwellings per annum 2018 to 2036, or 8,010 dwellings for the eighteen year period, as a starting point. Table 3 below sets out the

housing land supply and minimum requirement figures as at April 2019, looking forward to 2036.

**TABLE 3 HOUSING LAND SUPPLY AND MINIMUM REQUIREMENT AT 1<sup>st</sup> APRIL 2019**

		<b>Number of dwellings</b>	<b>Discounted Numbers</b>	<b>Cumulative Numbers</b>
1	Completions 1 <sup>st</sup> April 2018 to 31 <sup>st</sup> March 2019	223	-	223
2	Dwellings under construction	544	-	767
3	Dwellings with planning permission	846	761	1,528
4	Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	424	382	1,910
5	Number of dwellings required on new site allocations and on windfall sites to 2036	6,100		8,010

**TABLE NOTES**

The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.

*Line 2: Dwellings under construction at 31<sup>st</sup> March 2019 - assumed that all will be completed over the plan period.*

*Line 3: Other dwellings with planning permission at 31<sup>st</sup> March 2019 - assumed that 10% of these will not be completed.*

*Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31<sup>st</sup> March 2019 - assumed that 10% of these will not be completed.*

*Line 5: To reach the minimum requirement of 8,010 dwellings by 2036, together with windfall sites, further land will need to be allocated within the Borough for at least 6,100 new homes.*

- 8.105 The revised Planning Practice Guidance is clear that the need figure generated by the standard method should be considered as the minimum starting point in establishing a need figure for the purposes of plan production. There could be circumstances in which it is appropriate to consider whether actual housing need is higher than the standard method indicates, for example, where growth strategies are in place or strategic level infrastructure improvements are planned which could drive an increase in housing need.
- 8.106 The Council does not consider that it should plan for a higher level of housing need than the standard method suggests.
- 8.107 National guidance in the NPPF is that Local Planning Authorities should set out their policies and strategies for delivering the amount and variety of housing land, to support the Government’s objective of significantly boosting the supply of homes, and address the needs of groups with specific housing requirements.
- 8.108 This should include identifying a supply of specific, deliverable sites for years 1-5 from adoption with an appropriate buffer, and specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15. Where it is not possible to identify specific sites for years 6-10 and 11-15, broad locations for future growth should be indicated. Windfall sites will also contribute to the housing supply and these are defined in the National Planning Policy Framework as sites not specifically identified in the Local Plan. They normally comprise previously-developed sites that have unexpectedly become available.

**POLICY CS7: THE AMOUNT OF NEW HOUSING REQUIRED**

- a. **The Council has a housing requirement of at least 8,010 dwellings for the period 2018 – 2036. This equates to an annual average of at least 445 dwellings. The Council will, with its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area.**
- b. **The Council will secure the delivery of at least 445 dwellings per year as an average across the plan period to meet need arising from Ipswich. At 1st April 2019 223 dwellings have been completed since the start of the plan period, and 1,687 dwellings (discounted figure) are under construction, have planning permission or have a resolution to grant planning permission subject to a s106 agreement within the Borough.**

**The Council will additionally allocate land to provide for at least 6,100 dwellings (net) in the Borough. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period. Sites are identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb and the northern end of Humber Doucy Lane. 700 dwellings are expected to be delivered on small windfall sites between 2022 and 2036 at a rate of 50 per year. The housing land supply for the plan period will consist of:**

**Housing Land Supply**

<b>Ipswich Garden Suburb (3,500 minus 232 completions expected late 2036)</b>	<b>3,268</b>
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<b>Northern end of Humber Doucy Lane allocated through policy ISPA4</b>	<b>496</b>
<b>Site Allocations through policy SP2 of the Site Allocations Plan</b>	<b>2,750</b>
<b>Sub-total</b>	<b>6,514</b>
<b>Windfall sites 2022 – 2036 @ 50 p.a.</b>	<b>700</b>
<b>Total</b>	<b>7,214</b>

**c. In accordance with the Planning Practice Guidance, the housing requirement will be stepped to reflect the period when delivery at the strategic site of Ipswich Garden Suburb is expected to take place. From 2024 to 2036, completions at Ipswich Garden Suburb will meet a significant proportion of the annual housing requirement. Delivery will also take place at the northern end of Humber Doucy Lane, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure. The housing requirement will be stepped as follows:  
April 2018 – March 2024 300 p.a. x 6 years = 1800  
April 2024 – March 2036 518 p.a. x 12 years = 6216**

**In order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement of 8010 dwellings. This excludes the Opportunity Sites identified through policy SP4.**

- 8.109 Due to the constrained nature of the Borough boundary, the Council has a limited capacity for future development. The Council is actively working with neighbouring authorities to identify housing need across the Ipswich Housing Market Area and prepare aligned Local Plans to deliver it. The Council considers that the Ipswich housing need identified above can be met within the Borough. Housing delivery will be closely monitored across the Ipswich Strategic Planning Area. Ipswich Borough Council has published a Housing Delivery Action Plan to support delivery within the Borough.
- 8.110 Within the Borough, sites are allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document, having regard to the strategy set out within this document, in CS10 and CS2. The Council has undertaken an update to the 2010 Strategic Housing Land Availability Assessment, which now includes employment land also as a Strategic Housing and Employment Land Availability Assessment (SHELAA) and is satisfied that sites within the Borough are capable of being delivered. The SHELAA will be periodically updated.
- 8.111 The phasing of housing sites will be informed by the findings of the SHELAA, infrastructure delivery and the preparation of master plans. The SHELAA informs the Council’s housing trajectory. It is based on recent contact with developers and landowners. It is from this potential supply that site allocations are drawn. Within the tightly drawn boundary of Ipswich, options for the housing land supply are inevitably limited. Table 4 below provides a breakdown of the housing land supply. Delivery will be monitored closely through the Council's Authority Monitoring Report.
- 8.112 In working with neighbouring authorities to address housing need, consideration will need to be given to avoiding or minimising effects in these areas including environmental

designations, landscape, townscape and historic assets. This policy supports plan objective 3.

**TABLE 4 ESTIMATED HOUSING DELIVERY FOR 2019-2036 EXCLUDING CURRENT PERMISSIONS AS AT 1<sup>ST</sup> APRIL 2019**

Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings 2019-2036
IP-One	100%	2,034
Rest of built up area	83%	716 (PDL:594)
Ipswich Garden Suburb (see policy CS10)	0%	3,268
Northern end of Humber Doucy Lane (see Policy ISPA4)	0%	496
<b>Total 2019-2036 (excluding windfall)</b>	<b>40.3%</b>	<b>6,514 (PDL: 2,628)</b>
Windfall sites 2022 – 2036	90%	700 (PDL: 630)
<b>Total 2019-2036</b>	<b>45.2%</b>	<b>7,214 (PDL: 3,258)</b>

## **POLICY CS8: Housing Type and Tenure**

8.113 National policy in the National Planning Policy Framework calls for a range of homes to be provided in terms of tenure, type and size in order to support the creation of strong, vibrant and healthy communities. The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This demands an understanding of the existing dwelling stock, and the nature and needs of existing and projected future households. It also requires some understanding of the Ipswich housing market. A Strategic Housing Market Assessment (SHMA) Part 2 report of the Ipswich housing market area (HMA) was published in May 2017 (updated September 2017 and January 2019) and provides evidence to support policy preparation on this matter.

### **POLICY CS8: HOUSING TYPE AND TENURE**

**The Council will plan for a mix of dwelling types to be provided, in order to achieve strong, vibrant and healthy communities. All major schemes of 10 dwellings or more will be expected to provide a mix of dwelling types and sizes.**

**Exceptions to this approach will only be considered where:**

- a. A different approach is demonstrated to better meet housing needs in the area; or**
- b. The site location, characteristics or sustainable design justify a different approach; or**
- c. A different approach would expedite the delivery of housing needed to meet targets and is acceptable in other planning terms.**

**In considering the most appropriate mix of homes by size and type for major residential development proposals, the Council will take a flexible approach having regard to the needs identified through the Ipswich Strategic Housing Market Assessment, where it remains up to date, any other evidence of local needs supported by the Council and the policies of this plan.**

**Over the plan period, the Council will seek to secure a diverse range of housing tenures in the market and affordable sectors, to support the creation of mixed and balanced communities. Overall provision should meet the needs identified through the Ipswich Strategic Housing Market Assessment, where it remains up to date, and any other evidence of local needs supported by the Council. Affordable housing provision within market housing schemes will be made in accordance with policy CS12.**

**For affordable housing provision, the most appropriate type, size and mix for each development will be guided by the Council's Affordable Housing Position Statement, where it remains up to date, and the particular characteristics of the site.**

**The Council will support Self Build, Custom Build and Co-Housing developments for residential accommodation in appropriate locations, in the interests of supporting high quality homes which meet the identified needs of the Borough. In considering major development applications, the Council will consider the currently applicable Self Build Register and whether provision should be included within the development.**

8.114 A range of types, sizes and tenures of properties is needed across the plan period, rather than a significant majority of one type at one time. The approach set out in this policy will

help to ensure a variety of provision. The Strategic Housing Market Assessment (SHMA) is reviewed approximately every three years. It analyses forecast household growth by characteristics such as age and size, and considers the existing housing stock. Whether it is up to date will be considered in relation to when it was prepared and any significant changes in the market since its preparation.

- 8.115 The NPPF (paragraph 61) requires Councils to plan for the size, type and tenure of housing needed for different groups in the community. The policy above addresses the needs of households of different sizes, including families with children and single person households, and those wishing to build their own homes. Policy DM12 addresses the need for homes suitable for people with disabilities. Affordable housing is addressed through policy CS12 (and CS10 at Ipswich Garden Suburb) and the needs of Gypsies and travellers are addressed through policy CS11.
- 8.116 Ipswich has a higher than average student population. Between 2001 and 2011, this population grew more quickly than in the Eastern Region or England. The SHMA reports over 4,500 full and part-time students studying at the University of Suffolk, equating to a full-time equivalent of 3,200 students. Just over 15% of students require accommodation, with 573 resident in on-campus halls of residence, 137 living in off-campus halls of residence and 37 in the local private rented sector. Some 70% of the student population are from the local area and the majority of these are thought to be living at their parents' home whilst studying. The private rented accommodation occupied by students is located within one mile of the waterfront campus and there are no notable problems with students in relation to housing currently. The influence on the local housing market of the student population is not expected to alter over the plan period with any growth in numbers likely to be accommodated by the private rent sector.
- 8.117 The proportion of older person households, in which everyone is aged over 65 is lower in Ipswich at 19.1% than in the HMA as a whole (24.5%), the Eastern Region (22.3%) and England (20.5%). However, the SHMA forecasts that, over the plan period, this population will increase by 57.8% across the HMA. In terms of specialist dwellings for older persons (Class C3b), the SHMA identifies that there is likely to be a surplus of 185 sheltered and extra care housing units by 2036 in Ipswich, such that it may be necessary to convert some of this housing into mainstream accommodation. Therefore, policy CS8 does not include specific provision for specialist homes for older persons. Where applications are made for assisted living and residential care provision, early discussion will be required between the applicant and the National Health Service (NHS) to ensure that impacts of residential care provision on the NHS are considered appropriately.
- 8.118 The mix of new housing that would best address the needs of the local population by tenure for Ipswich by 2036 is: 20.5% of housing to be affordable rented, 63.5% market housing including private rent, and 16.1% affordable home ownership (including shared ownership and Starter Homes). However, these figures do not take into account the funding that will be available to help provide subsidised housing and viability and therefore this profile is set out as a guide to the overall mix of accommodation needed.
- 8.119 Table 5 below uses data from the Ipswich SHMA Part 2 Update January 2019 (Appendix 4) to prioritise the size of additional homes needed across the Local Plan period, by tenure.

The Council will have regard to this table in determining the appropriate mix of dwelling sizes in major residential developments. Whilst there will be a need for dwellings of all the sizes shown, the Council will expect proposals to include some dwellings that meet the high priorities, where practicable.

**Table 5 - Size Priorities by Tenure for the Provision of New Dwellings**

	<b>1-bedroom</b>	<b>2-bedroom</b>	<b>3-bedroom</b>	<b>4 or more bedrooms</b>
Market homes	lower	medium	high	high
Affordable home ownership	medium	high	high	lower
Private rent	medium	high	high	high
Affordable/social rent	medium	high	medium	high

- 8.120 The approach to mix on major sites reflects the fact that larger schemes can best integrate a variety of housing types and can do so whilst still achieving appropriate densities, according to their location.
- 8.121 This policy links closely with policy CS2, which sets out a locational approach to development density, policy CS7 in setting out the housing requirement, and policy DM23 which covers housing density. Density is inextricably linked with the dwelling types and sizes that a development can incorporate together with the amount of land needed to meet the housing requirement. Central sites should be high-density developments (containing a higher proportion of flats); sites in or close to district centres should be medium-density developments (a mix of flats and houses or town houses); and sites elsewhere should be low-density developments (containing a higher proportion of houses).
- 8.122 It is important to strike an appropriate balance between providing freedom and flexibility for the housing market to operate and ensuring that a range of sites are available for different areas of the housing market. The exceptions in this policy allow a degree of flexibility in controlled conditions. For example it may be appropriate in certain circumstances for some sites to deliver more market housing in response to viability constraints. Additionally, where the market is failing to provide an appropriate level of affordable housing to meet the identified need, the Council may deliver up to 100% of a site for affordable housing within the context of the wider needs of the community.
- 8.123 Self Build or Custom Build is defined through the National Planning Policy Framework as housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. It is seen to support the individual self-builder, or community group for the delivery of low cost sustainable housing on small scale infill or windfall sites, or as part of large-scale planned development, for example at the Ipswich Garden Suburb, and will help in the delivery of a wide choice of high quality homes. Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building (which may or may not be meeting affordable housing need). They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough

suitable development permissions to meet the identified demand. At September 2018, the Ipswich self build register contains 70 names.

8.124 The Council will check the mix of housing being provided on large sites through the Authority Monitoring Report.

8.125 This policy supports plan objectives 3 and 4.

**POLICY CS9:  
Previously Developed Land**

**This policy has been deleted.**

## POLICY CS10: Ipswich Garden Suburb

- 8.126 The presumption in favour of sustainable development requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing. Paragraph 72 of the National Planning Policy Framework states that the supply of large number of new homes can often be best achieved through planning for larger scale development, such as extensions to existing towns, provided they are well located and designed and supported by the necessary infrastructure and facilities.
- 8.127 Urban regeneration objectives have led the Council to focus development into central Ipswich over recent years. This has supported the successful regeneration of the Waterfront and Portman Quarter, introducing a greater range of uses into each, thereby adding to their diversity and vibrancy. This strategy has seen significant redevelopment of previously developed sites within the town (including 93% of all housing between 2001 and 2014). It has benefited from rationalisation and restructuring in the employment sector away from more land intensive activities such as manufacturing, so that sites such as that on Ranelagh Road (formerly Compair Reavell) have come forward for mixed use redevelopment. However, the manufacturing sector has shrunk significantly and therefore it raises the question as to how far into the future the rationalisation of land uses in the centre of Ipswich will sustain a supply of brownfield sites.
- 8.128 The tight urban boundary to Ipswich Borough means that there is only one area of extensive greenfield land still available on the periphery of the town and within the Borough. The land is located on the northern edge of the urban area and is known as the Northern Fringe. Development of the Northern Fringe following garden suburb principles would represent a major urban extension to the town and, therefore, it is a strategic proposal to be planned through the Core Strategy.

### **POLICY CS10: IPSWICH GARDEN SUBURB**

**Land at the northern fringe of Ipswich, which is referred to as Ipswich Garden Suburb, will form a key component of the supply of housing land in Ipswich during the plan period.**

**The site, identified on the policies map, consists of 195ha of land which will be developed comprehensively as a garden suburb of three neighbourhoods: Henley Gate neighbourhood (east of Henley Road and north of the railway line), Fonnereau neighbourhood (west of Westerfield Road and south of the railway line) and Red House neighbourhood (east of Westerfield Road). Over the plan period, the site will deliver land uses as set out below:**

<b>Land use</b>	<b>Approximate area in hectares</b>
<b>Public Open space, sport and recreation facilities including dual use playing fields</b>	<b>40</b>
<b>A Country Park (additional to the public open space above)</b>	<b>24.5</b>
<b>Residential development of approximately 3,500 dwellings</b>	<b>100</b>

**A District Centre located within Fonnereau Neighbourhood, providing: 3.5**

- i. A maximum of 2,000 sq m net of convenience shopping, to include a medium/large supermarket between 1,000 and 1,700 sq m net;
- ii. Up to 1,220 sq m net of comparison shopping;
- iii. Up to 1,320 sq m net of services uses including non-retail Use Class A1, plus A2 to A5 uses;
- iv. Healthcare provision;
- v. A library;
- vi. A police office;
- vii. A multi-use community centre; and
- viii. Residential accommodation in the form of appropriately designed and located upper floor apartments.

**Two Local Centres located in Henley Gate and Red House neighbourhoods, together providing:**

- i. Up to 500 sq m net of convenience retail floorspace
- ii. Up to 600 sq m net of comparison retail floorspace; and
- iii. Up to 500 sq m net of service uses including non-retail Use Class A1, plus Classes A2 to A5; and
- iv. Community Centre use (which could include Country Park Visitor Centre use) located in Henley Gate

1.5 including 0.5ha per local centre in the Henley Gate and Red House neighbourhoods and 0.5ha within the Henley Gate neighbourhood for the country park visitor centre and community centre.

**A secondary school within the Red House neighbourhood with access from Westerfield Road 9**

**Three primary schools (one in each neighbourhood) 6**

The broad distribution of land uses is indicated on the policies map. The detailed strategic and neighbourhood infrastructure requirements for the development are included in Table 8B in Chapter 10. Triggers for their delivery will be identified through the Ipswich Garden Suburb Infrastructure Delivery Plan.

Future planning applications for the site shall be supported by an Infrastructure Delivery Plan based on the identified infrastructure requirements set out in Table 8B. The Infrastructure Delivery Plan shall set out in detail how the proposed development and identified strategic and neighbourhood infrastructure will be sequenced and delivered within the proposed schemes.

Overall, the Council will seek 31% affordable housing at Ipswich Garden Suburb. For each individual application, the level of affordable housing should be the maximum compatible with achieving the overall target and achieving viability, as demonstrated by an up to date viability assessment which has been subject to independent review. The re-testing of the viability will occur pre-implementation

of individual applications within each neighbourhood. Each phase of development will be subject to a cap of 35% affordable housing. The Council will seek a mix of affordable dwelling types, sizes and tenures in accordance with policies CS8 and CS12.

An Ipswich Garden Suburb supplementary planning document (SPD) has been adopted, which will:

- a. guide the development of the whole Ipswich Garden Suburb area;
- b. amplify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration;
- c. identify the detailed location of a district and two local centres and other supporting infrastructure; and
- d. provide guidance on the sequencing of housing and infrastructure delivery required for the development.

Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD.

Any development will maintain an appropriate physical separation of Westerfield village from Ipswich and include green walking and cycling links to Westerfield station, and provide the opportunity for the provision of a country park as envisaged by CS16 and is more particularly identified in the SPD.

The land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields necessary to enable development of the Ipswich School playing field site as part of the Garden Suburb development.

8.129 The indicative capacity at the Northern Fringe (Ipswich Garden Suburb) identified in the Strategic Housing Land Availability Assessment: has been reduced to 3,500 dwellings following early capacity work on the Ipswich Garden Suburb supplementary planning document. The Council has identified a need for 8,010 dwellings between 2018 and 2036, and the Garden Suburb forms a key component of meeting this need. The Council will work with Babergh, Mid Suffolk and Suffolk Coastal District Councils to ensure optimum sustainable distribution of housing within the Ipswich Strategic Planning Area, bearing in mind the amenity and ecological value of the countryside outside the Borough boundary as well as within it, and the increased congestion effects of any development outside the Borough boundary.

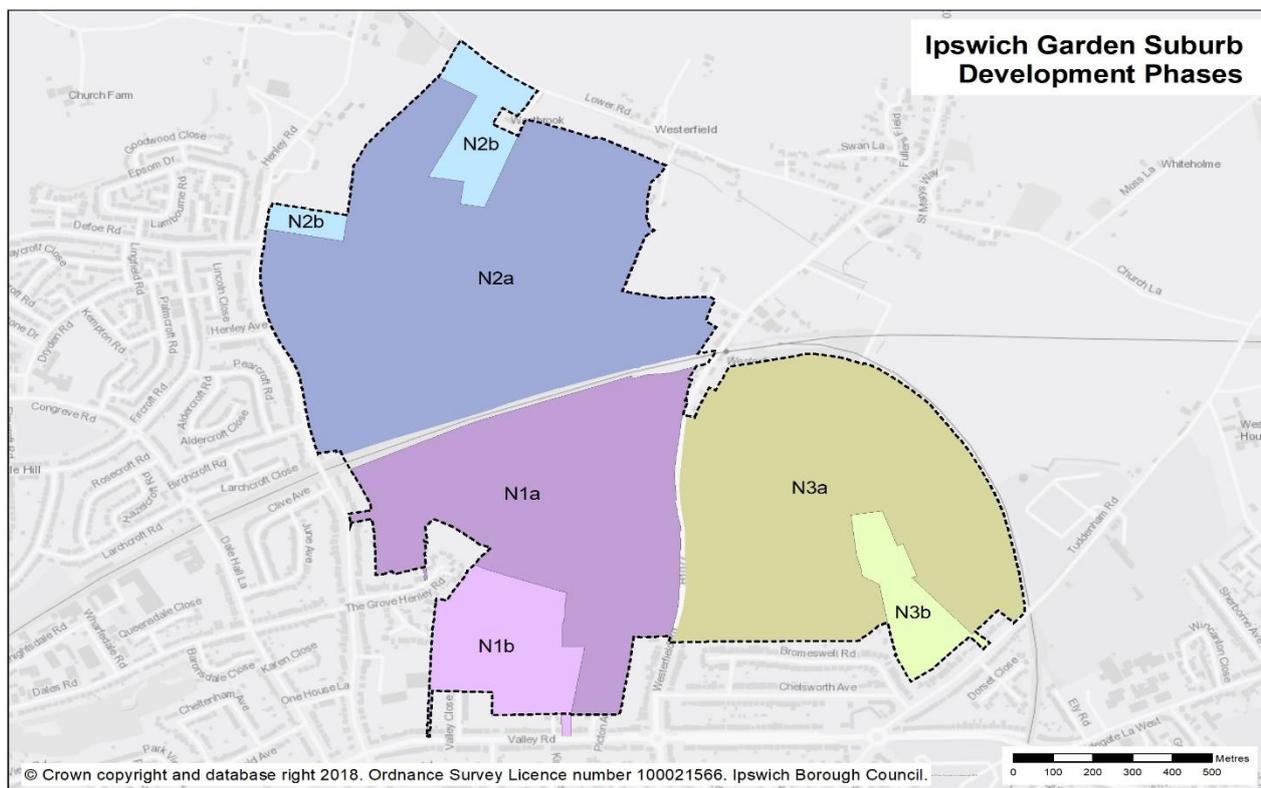
8.130 The policy provides for residential led development at the Ipswich Garden Suburb. The County Council's Structure Plan in 2001 concluded that of all major greenfield sites around the edge of Ipswich, the north Ipswich area was the most appropriate next one to build on. This conclusion was reached following an independent examination of various options.

- 8.131 In practical terms there are no other areas within the Borough boundary that the Council could realistically identify as having the potential as a location of future growth across the plan period.
- 8.132 The infrastructure requirements at the Garden Suburb will be significant and include new roads ecological networks and green corridors, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities. This infrastructure can also deliver benefits to the existing communities in the area and help to sustain them. A comprehensive and coordinated approach to the development of the Garden Suburb is required to ensure the proper planning and delivery of this infrastructure. The Council will consider using its compulsory purchase powers, where necessary, to enable comprehensive development and infrastructure delivery to take place.
- 8.133 The detailed infrastructure requirements of the development of approximately 3,500 dwellings at the Garden Suburb are identified in Table 8B in Chapter 10 of the Core Strategy. All infrastructure items identified through this policy and Table 8B have been identified by the Council and relevant providers as necessary to make the development acceptable in planning terms for various reasons related to ensuring sustainable development, mitigating transport impacts, meeting Habitat Regulations 2017 (as amended) requirements and ensuring future residents are well served by the necessary educational and social facilities essential to any successful residential development of this nature and scale. Each Ipswich Garden Suburb planning application will comply with the Community Infrastructure Levy Regulations tests. Table 8B divides the infrastructure into two categories:
1. Strategic Infrastructure, which is required to mitigate the cumulative impact of, and serve the whole of, the Garden Suburb development.
  2. Neighbourhood Infrastructure, which refers to local infrastructure required primarily to serve the needs of the residents of the neighbourhood in which it is located.
- 8.134 The purpose of Table 8B is to set a clear steer on what infrastructure should be provided. The trigger points for the delivery of the infrastructure items identified through Table 8B will be determined as part of the preparation of the Infrastructure Delivery Plan. This is intended to provide assurance as to how the development of the Ipswich Garden Suburb will be appropriately sequenced and supported by the necessary infrastructure. The triggers will be guided by:
- Advice from key stakeholders in light of available evidence concerning existing capacity, likely impact and mitigation required, for example through the Transport Assessment;
  - The likely sequencing and management of development identified through Strategic Phasing Plan documents;
  - The desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development;
  - Ensuring that the development is viable and deliverable; and
  - The availability of appropriate land.
- 8.135 Prior to development on the Ipswich School Playing Fields site, replacement sports facilities will be required to be first provided in accordance with policy DM5. The site for

replacement playing fields is allocated to the west of Tuddenham Road and north of the railway line.

- 8.136 The total number of dwellings likely to be accommodated within the Garden Suburb is approximately 3,500. In order to ensure that any development proposed for this area conforms to a coherent plan, work on the supplementary planning document commenced in early 2012 following the adoption of the Core Strategy in December 2011. Any planning application for the development of the area will be required to have regard to the content of the Supplementary Planning Document, which was adopted in March 2017. This is to ensure the proper long term planning of the Ipswich Garden Suburb area to deliver sustainable, integrated development. Key conclusions about infrastructure provision at the Garden Suburb from the Secretary of State's dismissal of the appeal by Mersea Homes in September 2010 are reflected in the policy above.
- 8.137 The Council has undertaken extensive viability work with input from the various development promoters at Ipswich Garden Suburb. This concludes that 31% affordable housing calculated as a percentage of dwellings is deliverable across the whole scheme. The Council will seek to secure 31% affordable housing across the scheme which would equate to 1,085 affordable houses in a total scheme of 3,500 homes. It is further recognised that the investment needed in infrastructure during the early phases of development may necessitate a lower percentage of affordable housing, but the viable percentage will increase as the need for infrastructure investment decreases in the later phases to allow the overall target of 31% across the Ipswich Garden Suburb. The Council recognises that the levels of affordable housing will be subject to more detailed viability work as part of the planning application process, and for those proposals which include a significant scale of development, then pre-implementation re-testing of viability will be expected for individual applications within a proposal. In recognition of the investment and risk certain development promoters will be making in the early phases of their developments, a 35% cap on the percentage of affordable housing for each phase will be applied (i.e. phases N1(a), N1(b), N2(a), N2(b), N3(a) and N3(b) as set out in the Ipswich Garden Suburb Viability Assessment by Gerald Eve, June 2016). It may be appropriate for certain components of each phase to deliver more than 35% affordable housing in order to deliver the overall target of 31%. These provisions would be secured through the relevant planning obligations. The development phases are illustrated on the map below.
- 8.138 This policy supports plan objective 3.

Map IGS1 Phases of development at Ipswich Garden Suburb as defined through the Infrastructure Delivery Plan adopted February 2017



## **POLICY CS11: Gypsy and Traveller Accommodation**

- 8.139 Local housing authorities will continue to decide how best to undertake their duties to assess the needs of all their residents and those who resort in their area. This will be in accordance with the legal obligations in the Equality Act 2010. National planning policy for Gypsies and Travellers is set out in Planning Policy for Traveller Sites (2015) and requires planning authorities to use their evidence to plan positively to meet the needs of Gypsies & Travellers and Travelling Show People and Boat People.
- 8.140 Ipswich has 43 permanent pitches for Gypsies and Travellers at present, and the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) 2017 identifies the Borough's needs to 2036. In addition, national guidance requires the Core Strategy to include a criteria based policy to guide the siting and location of sites for Gypsies and Travellers. The accommodation needs of Gypsies and Travellers need to be considered alongside those of the 'settled' population. The revised national Planning Policy for Traveller Sites, published in August 2015, amends the definition of Gypsies and Travellers for planning purposes to exclude those who have ceased travelling permanently.
- 8.141 Work is being undertaken with neighbouring authorities, the County Council and the Gypsy community to identify possible sites to meet the need to provide additional pitches in the Ipswich Strategic Planning Area. The policy will provide the context for the ongoing provision of pitches over the plan period.

### **POLICY CS11: GYPSY AND TRAVELLER ACCOMMODATION**

**Provision will be found within the Ipswich Borough where possible for additional permanent pitches to meet the need for 27 permanent pitches to 2036, as identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment 2017. Where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision.**

**Applications for the provision of permanent pitches will be considered against the following criteria:**

- a. **The existing level of local provision and need for sites;**
- b. **The availability (or lack) of alternative accommodation for the applicants; and**
- c. **Other personal circumstances of the applicant, including the proposed occupants must meet the definition of Gypsy or Traveller.**

**Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.**

- d. **The site should be located:**
  - i. **where it would be well served by the road network; and**
  - ii. **where it would be well related to basic services including the public transport network.**
- e. **The site should be:**
  - i. **accessible safely on foot, by cycle and by vehicle;**
  - ii. **free from flood risk and significant contamination;**
  - iii. **safe and free from pollution;**

- iv. capable of being cost effectively drained and serviced, including with waste disposal and recycling facilities;
  - v. proportionate in size to any nearby settlements, to support community cohesion; and
  - vi. where possible, located on previously developed land.
- f. The site should not have a significant adverse impact on:
- i. the residential amenity of immediate or close neighbours;
  - ii. the appearance and character of the open countryside;
  - iii. sites designated to protect their nature conservation, ecological networks, geological or landscape qualities;
  - iv. heritage assets including their setting; and
  - v. the physical and social infrastructure of local settlements.

**Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.**

**The Council will work with Suffolk County Council and neighbouring authorities to develop a South Suffolk transit (short stay) site between Ipswich and Felixstowe.**

**The needs of travelling showpeople will be kept under review. Applications for new sites will be assessed against criteria a. to c. above.**

**Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.**

- 8.142 Sites for Gypsies and Travellers could be privately or publicly provided - the criteria will apply equally to both, as they are about creating safe and healthy living conditions and providing sites within a reasonable distance of basic services such as schooling. Basic services include primary school, secondary school, convenience store, health centre or GP surgery, children's play facility, pharmacy and meeting place.
- 8.143 Sites will be sought to meet the joint needs of Ipswich and neighbouring authorities for permanent pitches within the Ipswich Strategic Planning Area. Need for Ipswich and its neighbouring authorities was identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) carried out in 2017 by RRR Consultancy Ltd. The 2017 ANA identified a need for 27 pitches in Ipswich Borough to 2036, out of a need for 52 pitches across the five local authority areas included in the assessment (Ipswich, Babergh, Mid-Suffolk, Suffolk Coastal and Waveney). Of the 27 pitches needed in Ipswich, 13 are needed between 2016 and 2021, 4 between 2021 and 2026, 5 between 2026 and 2031 and 5 between 2031 and 2036. No need was identified in Ipswich for the other types of provision.
- 8.144 The Council will work with Suffolk authorities to meet the joint transit (short stay) and permanent needs and the needs of travelling showpeople. The ANA identifies a need for three short stay sites across the study area.
- 8.145 Just as affordable housing is delivered through the planning system in larger housing developments where there is a local need, so the needs of Gypsies and Travellers should be met in a more systematic manner.
- 8.146 The Council will work with the Gypsy and Traveller communities to ascertain need in particular locations, prior to the identification or allocation of sites. Pitch demand will be kept under review.

- 8.147 The existing site at West Meadows is a large one containing 41 pitches. Whilst the Council would not limit the size of new sites, anecdotal evidence of preferences in the Gypsy and Traveller community locally is for smaller sites to provide pitches for family groups.
- 8.148 Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' for flood risk as defined in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance, are not permitted in Flood Zone 3 and require the exception test in Flood Zone 2. This is because, these developments are very difficult to make safe through raised flood levels.
- 8.149 This policy supports plan objectives 3 and 10.

## **POLICY CS12: Affordable Housing**

8.150 Affordable housing is defined through the National Planning Policy Framework (NPPF) glossary as housing for sale or rent, for those whose needs are not met by the market, including housing that provides a subsidised route to home ownership or is for essential local workers. The definition continues with a detailed breakdown of four types of provision:

- affordable housing for rent, which includes Social Rent and Affordable Rent.
- Starter Homes, which are new build homes for young, first-time buyers (below 40 years) to buy with a minimum 20% discount off the market price;
- Discounted market sales housing which is sold at a discount of at least 20% below local market value; and
- Other affordable routes to home ownership including shared ownership, equity loans, other low cost homes for sale, and rent to buy.

8.151 The NPPF requires planning policies to reflect the type and tenure of affordable housing needed. The Ipswich Strategic Housing Market Assessment (SHMA) 2017 Part 2 Report identifies that the total annual affordable housing need in Ipswich is 239 households per year, which represents 47.9% of the annual projected household growth in the Borough between 2014 and 2036 identified through the SHMA and around 50% of the need identified using the standard method. Development Viability remains challenging in Ipswich and this will need to be reflected in the policy requirements.

8.152 The SHMA identifies the housing tenure mix that would best address the needs of the local population. It suggests an overall requirement for 19.5% of housing to be Affordable Rented and 14.8% affordable home ownership. This does not take into account the funding that will be available to help provide subsidised housing.

### **POLICY CS12: AFFORDABLE HOUSING**

**The Council will seek to ensure that a choice of homes is available to meet identified affordable housing needs in Ipswich. Outside the Ipswich Garden Suburb and the northern end of Humber Doucy Lane, this will be achieved by requiring major new developments of 15 dwellings or more (or on sites of 0.5ha or more) to provide for at least 15% on-site affordable housing by number of dwellings.**

**At least 60% of affordable housing provision shall consist of affordable housing for rent including social rent and the remainder affordable home ownership.**

**The Council will only consider reducing the requirement for the proportion of affordable housing on a particular development site, or amending the tenure mix to include more affordable home ownership, in accordance with national policy or where:**

- a. **Alternative provision is outlined by the applicant within a site-specific viability assessment (using a recognised toolkit) and the conclusions are accepted by the Council; or**
- b. **An accepted independent review of development viability finds that alternative provision on viability grounds is justifiable; and**
- c. **The resultant affordable housing provision would ensure that the proposed development is considered sustainable in social terms through its delivery of housing integration, with particular regard to meeting the identified need for small family dwellings where these can reasonably be integrated into the scheme.**

**The presumption will be in favour of on-site provision rather than the payment of commuted sums in lieu of provision. Affordable housing should be integrated into developments and should not be readily distinguishable from market housing.**

- 8.153 The Ipswich Strategic Housing Market Assessment Part 2 Report 2017 and updated 2019 indicates that the mix of housing that would best address the needs of the local population would be an overall requirement for 20.5% of new homes to be affordable housing for rent (including social rent) and 16.1% affordable home ownership (including Shared Ownership and Starter Homes). Thus, affordable housing need represents approximately 36% of overall housing need. However, in setting the appropriate affordable housing requirement for the plan, the Council needs to take into account the funding available to help provide subsidised housing and the viability of delivery in Ipswich. The Ipswich Whole Plan Viability Report indicates that for most types of site (greenfield or brownfield and large or small), at least 15% affordable housing provision is a realistic and deliverable requirement other than in wholly or mainly flatted developments in the lower value area. Expressing the requirement as a minimum reflects the level of need in Ipswich and provides a starting point for negotiation where development values may support higher provision.
- 8.154 The National Planning Policy Framework 2019 indicates that at least 10% of homes should be available for affordable home ownership, unless this would significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Paragraph 61 indicates that different groups can include those who require affordable housing. The SHMA shows that the affordable housing need in Ipswich is primarily for affordable housing for rent. Therefore, the tenure mix set out in the policy is considered to best meet local needs.
- 8.155 The Council will aim to supplement affordable housing provision through private developments by developing its own sites and providing in excess of 15% affordable housing by number of dwellings. This will contribute to meeting the policy requirement for affordable housing on sites outside the Ipswich Garden Suburb to comprise at least 15% of new homes over the Plan period.
- 8.156 The independent review process will require the applicant to submit its development appraisal (to include a prediction of all development costs and revenues for mixed use schemes) to a Council-appointed assessor, who will produce an alternative appraisal for comparison by the Council. The independent review shall be carried out entirely at the applicant's expense. Where little or no affordable housing would be considered viable through the appraisal exercise, the Council will balance the findings from this against the need for new developments to provide for affordable housing in the Borough. In negotiating a site-specific provision with the applicant, the Council will have regard to whether or not the development would be considered sustainable in social terms.
- 8.157 The Ipswich 2005 Key Worker Study recognised the need for appropriate housing for key workers, but also found that key workers' wage rates compared well with other pay levels in the local economy. More recently, the 2017 Ipswich Strategic Housing Market Assessment (SHMA) Part 1 Report found that Ipswich has better affordability (house prices in relation to workplace earnings) than both the rest of the Ipswich Housing Market Area and the England benchmark (SHMA Chapter 6). For this reason, we believe that current affordable home ownership arrangements (e.g. through Help to Buy) meet the needs of key workers locally. Therefore, whilst the policy does not provide specifically for

key workers, their needs would be met through the affordable housing provision this policy requires.

8.158 Policy CS17 sets out the approach to delivering infrastructure in the Borough and reiterates the legislation governing the Community Infrastructure Levy that affordable housing will remain outside the standard charge system.

8.159 The NPPF definition of affordable housing will apply in implementing this policy.

8.160 The policy implements plan objective 3.

## WORK

8.161 It is equally important that the Council plans for employment issues as well as for new housing. This section addresses the strategic issues for jobs growth within Ipswich and the Ipswich Strategic Planning Area to 2036.

8.162 It is divided into the following two Policies:

Policy CS13:  
Planning for Jobs Growth

Policy CS14:  
Retail Development and Main Town Centre Uses

8.163 These are addressed in turn below.

### **POLICY CS13: Planning for Jobs Growth**

8.164 Whilst the focus of monitoring and meeting delivery targets is generally on residential development at a national level, it is essential that housing growth in Ipswich is supported by employment growth.

#### **POLICY CS13: PLANNING FOR JOBS GROWTH**

**The Council will promote sustainable economic growth in the Ipswich Strategic Planning Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of approximately 9,500 jobs in the Borough between 2018 and 2036 by:**

- a. **allocating a range and choice of sites amounting to at least 23.2ha of land for employment development (in Use Classes B1, B2 and B8) through the Site Allocations and Policies (incorporating IP--One Area Action Plan) Development Plan Document;**
- b. **protecting land for employment uses in existing employment areas defined on the policies map, including the function and strategic role of the port to Ipswich;**
- c. **allocating land for other employment-generating uses including education, leisure, tourism and hospitality, and retail, through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document;**
- d. **supporting the continued growth of the University of Suffolk and Suffolk New College in order to raise skills and qualifications levels in the workforce; and**
- e. **taking a lead with local partners to ensure that coordinated action is taken to encourage sustainable economic growth and protect local jobs, through implementing local and sub-regional economic strategies.**

8.165 Ipswich is a key economic driver of the Ipswich Strategic Planning Area within the Suffolk Economy. Jobs are defined as the Total Employment Jobs (000s) as set out in the EEFM (August 2017).

- 8.166 The Council has updated its economic evidence through joint studies for the Ipswich Economic Area. The Economic Sector Needs Assessment (ESNA) 2017 identifies the amount of land needed for B class employment development in the Borough, and the Employment Land Supply Assessment 2018 assesses the quality of employment land within the Borough. The Employment Land Supply Assessment has informed the Strategic Housing and Employment Land Availability Assessment. As a result, some land previously allocated or protected for employment uses has been re-allocated to residential or mixed uses through the Local Plan Review. The Employment Sector Needs Assessment identifies a need for 28.3ha of employment land in Ipswich 2014 to 2036. A pro rata adjustment to update the baseline date to 2018 results in a calculation of 23.2ha.
- 8.167 The allocation and protection of employment land through the Local Plan complements the Borough's updated Economic Development Strategy 2018, which has the overarching goal to improve the economic competitiveness of Ipswich and all it has to offer. This aligns with the Industrial Strategy 'Building a Britain Fit for the Future' which aims to create an economy that boosts productivity and earning power throughout the UK. The Ipswich Economic Development Strategy is based around four Strategic Priorities. These are;
- Strategic Priority 1: Promote Ipswich as a prominent and sustainable place to invest and grow businesses.
  - Strategic Priority 2: Stimulate a successful town centre and retail experience.
  - Strategic Priority 3: Inspire Ipswich to be the best place to live, work, learn and visit.
  - Strategic Priority 4: Prioritise Ipswich's strategic Infrastructure.
- 8.168 The ESNA (2017) anticipated that between 2014-2036 Ipswich Borough Council would experience a jobs growth of 19,040 jobs. When re-calculated on an annual basis to cover the emerging Local Plan period (2018-2036) this equated to a total jobs forecast of 15,577 jobs. The above results were arrived at using the 2016 East of England Forecasting Model (EEFM) dataset. However, since the 2016 EEFM dataset was used in the 2017 ESNA, the 2017 EEFM dataset has been released. The jobs forecast for Ipswich over the Plan Period when using the 2017 EEFM dataset shows a significant reduction to 9,318 jobs (-40%) when compared to the 2016 EEFM output of 15,577 jobs. Paragraph 16 of the NPPF (2019) states that plans should be prepared positively in a way that is aspirational but deliverable and the standardised methodology for housing has shown a reduction in the amount of housing required over the plan period compared to previously identified objectively assessed needs. The effect of the 2017 EEFM dataset release on the jobs forecast for the other ISPA authorities results in a decrease as well although less significant in terms of the proportion of job changes than Ipswich. In addition, the other authorities have also allocated amounts of land for employment that are considerably higher than the baseline level established through the 2017 ESNA. Overall, due to the lower levels of housing growth set out in the standardised methodology and the significant reduction in jobs forecast in the 2017 EEFM, the Council has selected an aspirational but deliverable jobs target of approximately 9,500 jobs.
- 8.169 The Economic Strategy for Norfolk and Suffolk has been developed by the New Anglia Local Enterprise Partnership (LEP) and endorsed by the Council. The overall objective of the LEP's strategy is to generate growth across all sectors, focusing on creating high value, highly skilled jobs and industries, whilst also providing the technical skills, access to innovative techniques and support that all businesses and the wider workforce needs to succeed. Ipswich has been identified as one of six 'Priority Places' in the Economic Strategy for Norfolk and Suffolk, as evidence shows there are significant opportunities and commitment for continued growth within the town. The plan sets out key development and investment targets for Ipswich. The high level ambitions set out in the Economic Strategy for Norfolk and Suffolk are supported by the Ipswich Borough Council Economic Development Strategy. The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document will translate the overall land requirement into sites. The Council will ensure that enough land is available, including a variety of site sizes and locations to suit different employment-generating activities. Appropriate employment-generating sui generis uses are defined through policy DM33.

- 8.170 It should be noted that the jobs growth aspiration covers all sectors and not just the employment use classes of B1 business, B2 general industry and B8 warehousing and distribution.
- 8.171 In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth over the plan period as identified in the Suffolk Growth Strategy and those growth sectors identified in the New Anglia Local Enterprise Partnership Economic Strategy for Norfolk and Suffolk (2017). These include:
- advanced manufacturing and engineering;
  - energy;
  - information and communication technology, tech and digital creative;
  - financial services and insurance;
  - Advanced agriculture food and drink;
  - transport, freight and logistics;
  - life sciences and biotech;
  - visitor economy – tourism and culture; and
  - construction and development.
- 8.172 The sectors which are particularly well represented in Ipswich are: information and communication technology, tech and digital creative; financial services and insurance; and transport, freight and logistics.
- 8.173 Office uses are directed to the town centre through the approach to the location of development set out in policy CS2. This will further be reflected in site allocations to be made in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review and is in accordance with the National Planning Policy Framework, which defines offices as a town centre land use. Economic growth and home working are also supported through policy CS5 which supports the provision of full fibre broadband to new development within the Borough.
- 8.174 The tourism sector, education sector and Ipswich Port are significant sectors in Ipswich. New development should be sensitive to existing uses including those at the Port of Ipswich and avoid potential impacts which may prejudice the continued operation of the Port. Policies elsewhere in this plan and/or the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document set out the approach to arts, cultural and tourism provision in the town, the Education Quarter and employment areas including the Port. The Council will support the University of Suffolk by safeguarding the campus for uses related to its operation.
- 8.175 The Council will work with partners and the market to aid jobs delivery. Particularly important will be joint work through the Suffolk Growth Strategy and with the New Anglia Local Enterprise Partnership to deliver the infrastructure needed for jobs.
- 8.176 The Council will also work through other areas of service delivery to support jobs growth, for example through marketing, promotion and investment activity to support employment, where appropriate.

## **POLICY CS14: Retail Development and Main Town Centre Uses**

- 8.177 As the county town serving a significant rural hinterland, Ipswich is an important focus for shopping, working, sport, culture, leisure, education and civic life for Ipswich residents and a wider population.
- 8.178 Within the Ipswich Strategic Planning Area the population is forecast to grow over the plan period, which will generate new retail expenditure. However, neighbouring centres such as Colchester and Bury St Edmunds have both enjoyed more recent investment in town centre retailing. In addition, there are other pressures on the centre such as the general decline in the performance of the high street, forecast business rate increases and store closures in the near future, nearby out of town retail parks largely outside the Borough, and internet shopping. Recent evidence and government policy encourages town centres to create environments that successfully complement shopping with other uses, such as food and leisure uses, in a way that sets them apart from online shopping or out-of-town retail parks. Therefore there is no room for complacency in planning to maintain and enhance Ipswich's role as a regional centre.
- 8.179 Improving the retail offer in Ipswich is an important objective of the Council. It is recognised that this needs to be done in as sustainable a manner as possible having regard to transport issues and the importance of increasing the vitality and viability of the central area and key district centres (see policy CS2).
- 8.180 The Ipswich Central Shopping Area sits in the historic core of the town to the north of the Waterfront. It has the advantages for the user of being attractive, compact and largely pedestrianised. The area is also a focus for other town centre activities such as the New Wolsey Theatre, the Regent Theatre and the Town Hall and Corn Exchange. The Central Shopping Area is complemented by a growing specialised retail role with food and drink venues in the vicinity of the Waterfront. It is important that the Council manages the physical and functional linkages between the two areas to maintain a positive relationship and ensure that retail development at the Waterfront does not harm the vitality and viability of the town centre.

### **POLICY CS14: RETAIL DEVELOPMENT AND MAIN TOWN CENTRE USES**

**The Council will promote high quality investment and development in Ipswich Central Shopping Area, to maintain and enhance its attraction and market share, and strengthen its regional role.**

**The Council will allocate land for 10,000 sq.m net of new comparison retail floorspace up to 2031, in accordance with the national requirement to allocate suitable sites in town centres to meet likely need looking at least ten years ahead. This reflects the Ipswich Vision Strategy for the town centre, the scale of housing growth set out in the plan, latest household projections and the most up-to-date evidence and monitoring of market conditions and the changing nature of the high street. The Council will review retail need within five years to ensure that this approach best supports the success of the town centre. The need for convenience floorspace over the same period will be met by the new District Centre at Ipswich Garden Suburb allocated through policy CS10.**

**In the district centres and local centres, the Council will encourage retail development of a scale appropriate to their size, function and catchment.**

**Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document, the Council will:**

- **Amend the Central Shopping Area and frontage zones to deliver flexibility;**
- **Strengthen north-south connectivity through the Town Centre; and**

- **Allocate sites within defined centres for retail development.**

**This will enable the delivery of additional floorspace to diversify the retail offer.**

**The Council will direct other town centre uses including offices, leisure, arts, culture, tourism and hotel developments into the town centre area, with some provision being appropriate in the Central Shopping Area and Waterfront, in recognition of the area's good accessibility by public transport, cycle and foot.**

**The Council will also promote environmental enhancements and urban greening to the town centre through the Public Realm Strategy Supplementary Planning Document and improved public transport accessibility.**

8.181 The Ipswich Retail and Commercial Leisure Study 2017 identified the following needs for the Borough in 2036:

- There is no need for comparison goods (non-food) retailing floorspace in the short-term up to 2021.
- in the medium-long term there is significant capacity of at least 34,800sqm net for new town centre comparison goods (non-food) retailing to 2036;
- additional capacity of at least 1,600 sq. m net convenience goods retail floorspace;
- a need for improvements to the existing retail stock;
- limited capacity for additional convenience (food) retailing;
- town centre environmental improvements, enhancements to the linkage between the town centre and the Waterfront, and, implementation of a marketing strategy;
- limited capacity for higher brand national multiple comparison retailing;
- a need for an additional department store to anchor the town's retail offer;
- a need for improved food and drink uses within the town centre, prioritised outside the primary shopping zone;
- a need to promote existing arts and cultural activities and improving the marketing of this;
- provision of a five star hotel with a conference venue;
- boost the evening economy through considering more leisure activity within the centre; and
- a need for large and modern shop units to satisfy the needs of major retail and leisure operators.

8.182 An amended Central Shopping Area with additional retail site allocations will go some way to addressing these gaps in the offer, subject to general market conditions. Sites will be allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (policy SP10). In addition to the allocation of sites, the amount of net comparison floorspace proposed takes into account the scale of housing growth set out through policy CS7 and vacant units present in the Central Shopping Area, such as the former British Home Stores building (3,316 sq. m net). Clearly delivery will be the key to success, and the Council will work with others and through its own land holdings and as local planning authority to achieve it. In addition the Council will evaluate the practicalities of improving evening access in the principal pedestrianised streets after normal trading hours, to encourage the use of facilities in the evening.

8.183 The Council will work with Ipswich Central, landowners and other partners to develop an active strategy to bring vacant premises in the town centre back into active use or, at a minimum, to introduce a scheme to make vacant premises look more visually attractive. Environmental enhancements and urban greening in the town centre are supported but must have consideration as to the impact on CCTV provision throughout the town.

8.184 An increase in the retail offer of key district centres is likely to be supported provided the retail offer is of a scale relevant to the catchment of that centre rather than the town as whole. Enhancing the facilities available in district centres can help to provide more choice for local residents within walking distance of their homes.

- 8.185 The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document amends the Central Shopping Area south-western boundary from that shown in the 2017 Local Plan to include parts of Princes Street, and exclude the former police station site at Elm Street. Enhancing the town centre and planning for it to be multi-functional forms an important part of the strategy for urban renaissance in Ipswich over the plan period.
- 8.186 Issues associated with the uses permitted within centres are addressed within Part C of this document.
- 8.187 This policy implements plan objective 5.

## LEARN

8.188 Whilst the previous two areas of 'LIVE' and 'WORK' make up the main components of the Core Strategy along with the 'INFRASTRUCTURE' section, the Council recognises the importance of education to the development of the town. This section therefore addresses the strategic component of this issue. The more detailed elements are left to the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.

There is only one policy relevant to this topic: policy CS15: Education. This is dealt with below.

### **POLICY CS15: Education Provision**

8.189 In planning for sustainable growth, it is essential that high quality education provision is available at all levels, in order to offer people the best possible opportunities to fulfil their potential and to enhance qualification and skills levels in the workforce. This includes opportunities for retraining or other lifelong learning. Ipswich fares relatively poorly in levels of educational attainment when compared with county and regional averages. It is a key objective of the Council to improve educational attainment and skills levels and access to such opportunities.

#### **POLICY CS15: EDUCATION PROVISION**

**The Council will continue to support the development of educational facilities at Suffolk New College and the University of Suffolk. Land for the further development of these facilities will be identified and safeguarded for education use through the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.**

**The Council supports the upgrading of education facilities and will seek to ensure that community access to school facilities is maximised. Should school facilities become redundant, any application for a non-community use will need to be supported by evidence that the facility and site is no longer needed for community uses.**

**New primary school provision will be needed to meet the demands of growth. Sites for new or extended primary schools in Ipswich will be identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. Development adjacent to existing schools should not compromise the ability of schools to expand to an appropriate size in future.**

**Any additional nursery and children's centre provision will be encouraged to locate within or adjacent to District and Local Centres or co-located within schools in order to facilitate linked trips by parents. Where land is available, this would also apply to schools. The sustainable location of such facilities so that they are accessible by walking, cycling or public transport will be a requirement.**

**Education needs associated with development at the Ipswich Garden Suburb are identified, a secondary school site allocated and broad locations for primary schools safeguarded through policy CS10 of this plan and the policies map. The sports facilities associated with the secondary school will be required to be made available for dual use by the community.**

8.190 The developments at Suffolk New College and the University of Suffolk are vitally important to the future well-being and prosperity of the town. The Council has been fully supportive of these initiatives and it is important that this support continues.

- 8.191 It is not considered by the County Council that a new secondary school site is required within the Borough boundary other than at the Ipswich Garden Suburb (see policy CS10).
- 8.192 Ipswich Borough Council has worked with Suffolk County Council to identify where new or extended primary and secondary school provision, and early years provision, will be needed over the plan period, in accordance with paragraph 94 of the National Planning Policy Framework. The Council has taken a positive approach to identifying sites for such provision through policy CS10 of the Core Strategy and Policies Development Plan Document Review and policy SP7 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) development Plan Document.
- 8.193 The Council is supportive of the principle to substantially upgrade education facilities - and recognises that there is a need for substantial regeneration within existing sites. However, in some cases school facilities are not available for community use out of hours. The Council will therefore press for the community use of facilities where possible.
- 8.194 At primary level, whilst local issues will be set out within the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document, the specific growth related development pressures and the need to improve facilities are considered to necessitate new or extended primary school provision within the town. These are facilitated within the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document and are included within the list of strategic projects in Part D.
- 8.195 At pre-school level the Council recognises the importance of nursery and children's centre provision and the importance of these being located in sustainable locations.
- 8.196 Measures identified to mitigate the impact of traffic on congestion and air quality could assist in ensuring sustainable travel to educational establishments and new education development will be expected to encourage sustainable means of transport. This policy supports objectives 5 and 9.

## PLAY

- 8.197 Cultural facilities, including leisure, play and sporting provision, are important for residents and visitors to the town, as is open space.
- 8.198 The Government in the National Planning Policy Framework points out how open space, sport and recreation can support many different objectives, including making an important contribution to the health and well-being of communities. There is one key policy under this heading, which is policy CS16.

## POLICY CS16: Green Infrastructure, Sport and Recreation

- 8.199 Ipswich contains a variety of public and private open spaces, sport and recreation facilities that serve a range of different functions. The strategic spaces, ecological networks, green corridors and facilities contribute fundamentally to the character and appearance of the town, and to quality of life. Examples include: the River Gipping corridor, the importance of which is recognised through the River Strategy; Belstead Brook Park; Orwell Country Park; and the large town parks such as Christchurch Park, Holywells Park, Chantry Park and Bourne Park. There are also smaller local spaces and facilities, which are essential for sustaining communities. The Ipswich Open Space, Sport and Recreation Study 2009 (as updated in 2017) identifies all the different types of open space, sport and recreation facility. Open space provision is generally lowest in the north of the Borough, with an under-provision of parks and gardens in the North West and North East Area Forum areas, amenity green space in the North East area, and natural and semi-natural green space in the North West, Central and North East areas. Other deficits affect more of the Borough, for example there is a significant shortfall in provision for young people across the Borough (such as skateparks, kickabout areas and youth shelters).
- 8.200 As the Borough grows, it is essential to protect, enhance and extend the network of open spaces, ecological networks, canopy cover, green corridors, and sports and recreation facilities. This is important in order to: allow people access to green space and nature; strengthen ecological networks that enable wildlife to migrate more easily around the town; link inner and outer parts of the Borough by providing walking and cycling routes; provide opportunities for formal and informal recreation; and to enhance the appearance of the town. The potential benefits are many - for example improved biodiversity, health and fitness, flood attenuation and better air quality.
- 8.201 The National Planning Policy Framework states that local planning authorities should set out a strategic approach in their local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It also requires local authorities to set local standards for open space, sport and recreation facilities, based on a local assessment of needs. It states that existing sites and facilities should not be built on unless they have been shown to be surplus.

### POLICY CS16: GREEN INFRASTRUCTURE, SPORT AND RECREATION

**The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well-designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, blue corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:**

- a. **requiring all developments to contribute to the provision of open space necessary for that development according to the Borough's standards, identified strategic needs and existing deficits in an area;**

- b. requiring major new developments to include usable on-site public open spaces and wildlife habitat. On-site provision must create a network or corridor with existing green infrastructure where such an ecological network or green corridor exists beyond the site boundaries;
- c. supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities, including water and river-based activities;
- d. working with partners to prepare, implement and monitor the Recreational Disturbance Avoidance and Mitigation Strategy and other strategies and management plans for green spaces, including an Orwell Country Park management plan, that will result in a reduced impact upon birds in the Orwell Estuary;
- e. supporting the Greenways Project in working with communities and volunteers to manage green corridors in Ipswich;
- f. support the enhancement of canopy cover and ecological networks;
- g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green trail around Ipswich;
- h. working with strategic partners and developers to ensure the provision of a new country park and visitor centre within the Ipswich Garden Suburb, and an extension to Orwell Country Park;
- i. promoting improved access to existing facilities where appropriate;
- j. reviewing the town's estate of sports facilities to consider how they can best meet the needs of a growing population; and
- k. 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.

**Policies in this plan and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document identify existing, new and proposed open spaces, sport and recreation facilities, green corridors and networks and allocate sites for new open spaces and facilities.**

- 8.202 The Council considers that an integrated network of accessible open spaces, sport and recreation facilities is an essential part of the Borough's infrastructure and character. It provides opportunities for formal and informal recreation and sport, for wildlife to flourish and migrate around the area and for sustainable travel around the town on foot or by cycle. It also improves the townscape, helping to break up and soften the urban area. The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document will identify the sites and networks.
- 8.203 A development management policy in Section C of this document and Appendix 4 set out the local standards of provision of open spaces, sport and recreation facilities, based on the Ipswich PPG17 Study, which has been updated by the Council's Parks and Open Spaces team. The infrastructure plan in Section D of this document sets out the strategic green infrastructure needs. The Council recognises that it will need to work with neighbouring local authorities to implement this, as realistically parts of any such network will be outside the Borough boundary. Strategic needs were identified by the Haven Gateway Green Infrastructure Strategy and the Council will consider the recommendations in planning

future provision. In relation to the proposed 'green trail', the Council will work with neighbouring local authorities to address cross boundary green infrastructure provision and identify sites or routes later in the plan period.

- 8.204 Open spaces can perform more than one function. An important role for some open spaces will be to act as flood water storage areas or flood paths. Flood risk assessments should where possible and appropriate, identify areas in valley bottoms at risk of flooding as flood management assets and keep them open. Natural flood management can help to reduce flooding by working with natural process, reconnecting watercourses with flood plains to enhance flood storage in times of need and taking opportunities to restore watercourses to a naturalised state. This should be considered and incorporated into developments whenever opportunities arise. Such measures can provide benefits in terms of biodiversity, amenity, health and wellbeing and should be incorporate into the scheme design from the outset.
- 8.205 The Council is investigating the need for sports, cultural and leisure provision in Ipswich. This will include a review of how the Borough's sports halls and school facilities can best meet the need for additional sports provision.
- 8.206 One of the findings of the Appropriate Assessment of the Core Strategy and Policies plan was that the combined growth in Ipswich Borough and Suffolk Coastal District could harm the Special Protection Area in the Orwell Estuary, and could contribute to harm to European nature conservation sites in the Suffolk Coast and Heaths AONB. Policy CS16, particularly CS16 (d) and CS16 (h) commit the Borough Council to working with others to ensure the necessary mitigation is provided so that harm is avoided.
- 8.207 The Council, working jointly with the other local authorities in the ISPA, have been working on the Recreational Avoidance and Mitigation Strategy (RAMS) to mitigate the pressure caused by new developments on the internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites. The partnership work, supported by Natural England, has established a strategy to mitigate the impacts and is due to be supported by a Supplementary Planning Document (SPD) that will provide further details in respect of cost implications and subsequent implementation. It should be noted that there will be instances where on-site mitigation is required in addition to a financial contribution towards the RAMS, in consultation with Natural England, for example the Ipswich Garden Suburb Country Park.
- 8.208 This policy links closely to policy CS17 and, as part of the standard charge payable in association with new developments, will relate to the provision of strategic green infrastructure for the town.
- 8.209 This policy implements plan objective 8.

## INFRASTRUCTURE

8.210 For development to take place in an appropriate manner it is essential that proper consideration is given to the infrastructure needs associated with the levels of development proposed. Whilst many infrastructure issues will just relate to individual developments, the Council believes that there are four areas where there is a need for strategic consideration of relevant issues within this document. These are:

Policy CS17:  
Delivering Infrastructure

Policy CS18:  
Strategic Flood Defence

Policy CS19:  
Provision of Health Services

Policy CS20:  
Key Transport Proposals

### **POLICY CS17: Delivering Infrastructure**

8.211 It is critical that Ipswich receives the infrastructure it needs to support the delivery of both housing and jobs growth, and to ensure that existing communities can be sustained. It is important that growth should bring benefits to, and not adversely affect the quality of life of, existing communities. The development at Ravenswood has shown how a new urban community can be developed, such that housing is delivered alongside schools, shops, open space, bus services and other facilities.

8.212 There are a number of ways to ensure infrastructure delivery through the planning system. The existing system in Ipswich is that of: developer obligations secured in Section 106 Agreements, which cover on- and off-site requirements including affordable housing, open space provision, transport measures, and education provision. However, this system has not adequately picked up more strategic infrastructure impacts or needs.

8.213 Therefore the Council is considering whether it shall adopt a standard charge approach to the delivery of infrastructure alongside Section 106 Agreements, which was brought into force by the Community Infrastructure Levy (CIL) Regulations in April 2010. This would permit the Council to pool developer contributions raised through the levy and spend on infrastructure requirements for both the neighbourhood in which the development forms a part and the whole of Ipswich, although in turn would limit the use of Section 106 Agreements. A review of the best way forward with securing infrastructure funding is ongoing.

8.214 Infrastructure can take many different forms. Appendix 3 to this plan lists the types of infrastructure referred to in this policy.

#### **POLICY CS17: DELIVERING INFRASTRUCTURE**

**The Council will require all developments to meet the on- and off-site infrastructure requirements needed to support the development and mitigate the impact of the development on the existing community and environment.**

Each development will be expected to meet site related infrastructure needs. Where the provision of new, or the improvement or extension of existing, off- site infrastructure is needed to support a new development or mitigate its impacts, and it is not anticipated that the infrastructure will be provided through CIL, the development will be required to contribute proportionately through a Section 106 Agreement commuted sum, or other mechanism as agreed with the Council.

Section 106 Agreements will apply to all major developments and some minor developments but may be varied according to:

- a. the scale and nature of the development and its demonstrated viability; and
- b. whether or not a planning obligation meets all of the statutory reasons ('tests') for granting planning permission.

The broad categories of infrastructure to be secured or financed from new developments are as follows and detailed further in Appendix 3:

1. highways and transport;
2. childcare, early years and education;
3. health and emergency services;
4. environment and conservation;
5. community and cultural facilities including heritage and archaeology;
6. sport and recreation;
7. economic development; and
8. utilities.

Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy include the following (not in priority order):

- Ipswich flood defences;
- sustainable transport measures and accessibility improvements between the Central Shopping Area, Waterfront and railway station;
- measures to increase and maximise east-west capacity in the public transport system to ease congestion;
- strategic education provision of new schools;
- strategic green infrastructure including a country park;
- sports and leisure facilities serving the whole Borough;
- community facilities including GP surgeries and health centres;
- water management infrastructure;
- new primary electricity substation in Turret Lane;
- town centre environmental enhancements; and
- ultrafast broadband and the opportunity for full fibre broadband to the premises (FTTP).

There are specific requirements linked to the Ipswich Garden Suburb that are identified in the Ipswich Garden Suburb supplementary planning document that has been adopted in advance of any development taking place there.

The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Recreational Avoidance and Mitigation Strategy can be addressed and delivered, including for any measures not classified as infrastructure.

8.215 Growth requirements across the Borough will place additional pressure on existing infrastructure and will therefore require improvements to be made to existing infrastructure, and the provision of new infrastructure. A number of pressures can be relieved through site-specific provision such as open space, children's play areas and the provision of affordable housing. However, there are other infrastructure improvements

and requirements that cannot always be accommodated on-site, or that relate to strategic off-site facilities serving the whole neighbourhood or Borough. It is therefore considered appropriate to pool developer contributions towards off-site provision to help ensure its delivery. Table 8A in Chapter 10 identifies the infrastructure proposals required to support growth. Development may need to be phased to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing arrangement.

- 8.216 Responsibility for the delivery of infrastructure will be shared between developers, Ipswich Borough Council and key partners such as the New Anglia Local Enterprise Partnership, utilities companies, Highways England, Suffolk County Council, neighbouring local authorities, the Environment Agency, Homes England, Natural England and local community groups. Transport mitigation measures are identified through the Ipswich Strategic Planning Area (ISPA) Local Plan Transport Mitigation Strategy and policy CS20. They may be secured in different ways: the provision of site-specific physical transport infrastructure and sustainable travel measures, secured through section 106 and section 278 agreements as appropriate, and financial contributions towards strategic transport measures secured through section 106. A section 278 agreement is an agreement made between a developer and the highway authority under the provisions of the Highways Act 1980, which enables works to a public highway.
- 8.217 The Council is committed to securing a high quality communications infrastructure. Developers of all new sites (residential and non-residential) should engage with broadband providers to ensure new development is capable of delivering at least ultrafast broadband as part of the build process.
- 8.218 The Habitats Regulations Assessment identifies a range of measures to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough are mitigated. This relates to mitigating the cumulative effect of housing growth across Ipswich Borough, in combination with housing growth in Suffolk Coastal district. The measures include the provision of the Country Park or similar high quality provision to the north of Ipswich, delivering parts b, d, e, g and h of policy CS16, production and implementation of visitor management plans at key sites and a monitoring programme to assess visitor impact over time. The Council has, with neighbouring authorities, prepared a Recreational Avoidance and Mitigation Strategy, which specifies the measures required and how these will be delivered. The strategy will be supported by a supplementary planning document setting out the charges to be applied to development.
- 8.219 The Council has identified through its Housing Delivery Action Plan that delays in completing S106 legal agreements is hampering housing delivery in the Borough. The Council has committed to reviewing its S106 procedures and will refuse applications where the legal agreement is not actively pursued through to completion.

## **POLICY CS18: Strategic Flood Defence**

- 8.220 Much of central Ipswich lies within the tidal floodplain of the River Orwell. Existing flood defences are subject to a continuing schedule of improvements to make the defences fit to resist rising sea levels in the future.
- 8.221 The Environment Agency, DEFRA and Ipswich Borough Council have agreed a Strategic Flood Defence Management Plan for Ipswich, which is in the process of being implemented. Its implementation has occurred in three phases:
- a. raising the lock gates at the entrance to the Wet Dock - this was done in December 2008;
  - b. raising the river walls on the east and west banks to the south of the Island Site - completed July 2014; and
  - c. installing a tidal flood barrier in the New Cut at the southern end of the Island Site – completed February 2019.
- 8.222 The Strategic Flood Defence Management Plan for Ipswich is part of a long term (100 year) plan and will include repairs to existing tidal and fluvial defences upstream of the barrier. The strategy is being planned to avoid the need to raise the level of these defences.

### **POLICY CS18: STRATEGIC FLOOD DEFENCE**

**The Council will continue 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.**

- 8.223 The need for and importance of the Ipswich Flood Defence Strategy is central to the Core Strategy document. This is reflected within the objectives set out in Chapter 6. As such it should continue to be recognised as one of the key pieces of infrastructure for which funding from the standard charges (policy CS17) could be used as matched funding to help secure national flood defence funding.
- 8.224 The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document will need to have particular regard to the flooding issues. The DPD will identify those sites at risk and the Ipswich Strategic Flood Risk Assessment (SFRA) Level 2 will inform allocations in this area and identify any residual risks following completion of the flood barrier.
- 8.225 Part C of this document includes policies relating to flooding to reflect the NPPF and the detailed findings of the Ipswich Strategic Flood Risk Assessment.
- 8.226 The Council will continue to work with the partner organisations to ensure the remaining elements of the Strategic Flood Defence Management Plan for Ipswich are completed. In the interim period it is recognised that the Council needs to work with its partners to put in place better arrangements to cope with emergency planning scenarios associated with flooding.
- 8.227 This policy implements objective 7.

## **POLICY CS19: Provision of Health Services**

8.228 It is important for the health and well-being of the Ipswich community that there is adequate provision of health infrastructure, be that GP surgeries, clinics, health centres or hospitals.

### **POLICY CS19: PROVISION OF HEALTH SERVICES**

**The Council safeguards the site of the Heath Road Hospital Campus, which is defined on the policies map, for healthcare and ancillary uses. Ancillary uses may include:**

- **Staff accommodation;**
- **Residential care home;**
- **Intermediate facilities;**
- **Education and teaching centre; or**
- **Therapies centre.**

**Proposals for new and improved healthcare and ancillary facilities at the Heath Road site will be supported, provided that they would not compromise the future delivery of health services at the site. This would be demonstrated through proposals being accompanied by a detailed master plan and a medium to long term strategy for healthcare provision at the site that includes a satisfactory travel plan and measures to address associated local car parking issues.**

**Proposals to develop additional, new, extended or relocated local health facilities such as GP surgeries will be supported provided that they are located in or adjacent to the town centre or a district or local centre. Exceptions will only be permitted where the applicant can demonstrate to the Council's satisfaction that the location would be fully accessible by sustainable modes of transport, and would serve the patients or fill a gap in existing provision more effectively than any other better located and realistically available site.**

8.229 The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. Decisions on changes to acute care provision need to be considered in the context of their health impact, in particular the community's ability to access services appropriately and in a timely fashion.

8.230 It is also essential that the travel implications are fully considered and measures put in place to encourage the use of sustainable modes where possible by staff, out-patients, and visitors. In particular, measures should tackle existing parking issues in surrounding residential areas associated with Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving effective.

8.231 Where other healthcare sites become available for re-use, the Council will wish to be satisfied that they are not needed for other community uses before considering non-community uses. This is because it is difficult to find sites for such uses and once they are lost they are extremely difficult to replace.

8.232 With a growing population in Ipswich, several of the GP practices are currently looking to relocate, merge, expand or even all three. This process of adaptation could continue over the plan period. Allocations that include healthcare facilities will be made in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document to deal with known needs now. For needs that emerge later in the plan period, the Council will seek to direct such uses to the town centre and district and local centres

as these are the most accessible locations. Such locations are likely to result in less potential disturbance than in an entirely residential area and the centres could benefit from linked trips. Healthcare provision may include a range of different facilities, such as pharmacies, dental surgeries and clinics.

8.233 This policy supports plan objectives 9 and 10.

## **POLICY CS20: Key Transport Proposals**

- 8.234 Strategic and local transport measures are important in enhancing the connectivity of Ipswich to other places and enabling people to move around within the town. An Integrated Transport Strategy for Norfolk and Suffolk was adopted by the New Anglia LEP board and partners in summer 2018 and sets out high level goals for transport. At a county level, the Suffolk Local Transport Plan is currently under review.
- 8.235 At a local level, a key objective of the Council is to improve the pedestrian and cycle accessibility between key nodes in the central area, two of which are the Central Shopping Area and the Waterfront. It is recognised that better pedestrian crossings and other measures could improve the linkages between the shopping area and the Waterfront, and a number of such crossings are already planned.
- 8.236 Public transport is an important part of the current and future transport packages. More details on these proposals will be included in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.

### **POLICY CS20: KEY TRANSPORT PROPOSALS**

**The Council supports key transport proposals needed to mitigate the traffic impacts within Ipswich of planned growth within the Ipswich Strategic Planning Area. These may include:**

- a. Measures to increase bus usage such as a quality bus partnership or demand responsive transport;**
- b. Promoting ‘Smarter Choices’ and requiring travel planning for larger new developments;**
- c. The use of new and emerging technologies and the delivery of more electric vehicle charging points;**
- d. Reviewing park and ride provision, with an ambition to re-establish the Bury Road Park and Ride service and site and exploring the feasibility of a new park and ride facility at Nacton Road;**
- e. Adopting an Ipswich town centre parking plan;**
- f. Enhancing cycling and walking infrastructure;**
- g. Infrastructure improvements where necessary; and**
- h. Exploring longer term legislative measures to help improve air quality.**

**The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the Highways England capital funding programme and bidding for other relevant funds.**

**The Council will support further measures to facilitate cycling and walking in the Borough, including crossings of the river and railway lines to improve connectivity between residential communities and jobs, services or facilities and transport hubs, and to prioritise pedestrians and cyclists in Ipswich town centre. The Council will also support ongoing work to examine the feasibility of a Wet Dock Crossing, which may consist of Bridges B and C of the Upper Orwell Crossings project and, notwithstanding the results, measures to enable the redevelopment of the Island Site (site IP037).**

**Land allocations or safeguarding for transport facilities are detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document and policy CS10/Table 8B for Ipswich Garden Suburb.**

- 8.237 The Council supports the thrust of current national and local policy on transport which is on travel demand management and offering a genuine choice of transport modes. It also supports the key transport improvements identified through the policy. Strategic transport proposals, which extend beyond the Borough boundary and the ISPA area but form the context for this Local Plan, are set out through policy ISPA2.
  
- 8.238 To understand the cumulative impact on the highway network of the combined growth proposed through the draft updated Local Plans for Ipswich, Suffolk Coastal Area, Babergh and Mid Suffolk to 2036, assessments have been undertaken using the Suffolk County Transport Model (SCTM). A modelling report published in January 2019 identified that ‘... the built up area of the Ipswich network comes under particular strain, [and] that in a number of locations the ability to deliver road capacity improvements is highly constrained by available space and could also move the problem ‘further down the road’<sup>5</sup>.
  
- 8.239 In response, Suffolk County Council has drafted a Transport Mitigation Strategy for the Ipswich Strategic Planning Area. It recognises that the impacts on Ipswich are cumulative and consequently apports costs for the mitigation measures according to the trips in and out of Ipswich by district and borough. Table 6 below shows that 45% of all journeys in Ipswich begin and end in Ipswich. Mitigation measures may consist of town-wide measures or improvements to junctions within Ipswich.

**Table 6 – Ipswich Strategic Planning Area – Trip Destinations in Ipswich**

<b>LPA</b>	<b>% trips</b>
Ipswich Borough Council	45
Suffolk Coastal Local Plan area	28
Babergh District Council	14
Mid Suffolk District Council	13

- 8.240 Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board.
  
- 8.241 There are particular concerns about highway capacity within the Star Lane area of Ipswich Town Centre, as this impacts on east-west vehicle movements and pedestrian connectivity between the central shopping area and the Waterfront. These capacity implications are closely linked to issues associated with the wider transport network – including the A14 and the Orwell Bridge. There are, in addition, five Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic. Air Quality Management Areas are designated in areas where poor air quality may have an effect on people’s health.
  
- 8.242 Historically, the Council and partners commissioned a study to advise on the Gyratory, which reported in 2007 (the Ipswich Waterfront Study). The consultants advised that the two lanes of traffic should be reduced to one in both an easterly and westerly direction.
  
- 8.243 In the longer term, and to assist with addressing issues in the Star Lane gyratory, the Council also supports the provision of significant alternative east-west transport capacity. To this end, it will, where it can be justified, continue to make a case for a package of measures

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<sup>5</sup> SCC Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019, paragraph 1.1.4

including a Wet Dock Crossing and traffic management schemes to be included within each version of the Local Transport Plan, in order to:

- a. enable improvements to pedestrian and cycle routes between the Waterfront and the historic core of the town by subsequently reducing capacity on the Star Lane gyratory;
- b. enable the development of the Island Site for which access improvements, but not necessarily a Wet Dock Crossing, would be a prerequisite;
- c. enable the linking of high quality walking and cycling routes around the entire Waterfront area; and
- d. provide an alternative route for east-west movements which, along with appropriate traffic management schemes, would help to relieve congestion and air quality issues in the Gyratory, which in turn will support the town's economy and health.

8.244 Detailed proposals, including those for additional infrastructure for pedestrians and cyclists, are included in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. A Cycling Strategy Supplementary Planning Document has been adopted by the Council. The Council is also producing a Low Emission Strategy Supplementary Planning Document and an Air Quality Action Plan.

8.245 The delivery of a Wet Dock crossing (i.e. a new road linking Holywells Road/Duke Street with Hawes Street the subject of ongoing work. In March 2015 the New Anglia Local Enterprise Partnership obtained funding in order to carry out a feasibility study for the Wet Dock Crossing. The feasibility work was done for a scheme consisting of three potential crossings entitled the 'Upper Orwell Crossings' and funding towards its delivery was secured from the Government. The County Council cancelled the Upper Orwell Crossings project in January 2019, because of a financial shortfall. It has made a commitment 'to work with partners to deliver crossings B and C in the Waterfront area' and continues to underwrite a maximum of £10.8 million to enable the project to go ahead.

8.246 The Island site in the Wet Dock is a key site in relation to the Waterfront regeneration. However, access to the Island is limited and therefore some form of additional access would be needed to bring the site forward for redevelopment.

8.247 At a minimum, a road bridge from the west bank to the Island site and a pedestrian and cycle bridge across the Wet Dock lock gates to the east bank will be required to enable any significant development on the Island.

8.248 In any event, the Council would resist any significant reduction of road capacity on the gyratory without the prior provision of either some alternative capacity (e.g. the Wet Dock Crossing) or significant and successful travel demand management measures.

8.249 This alternative capacity could also be provided via a northern bypass or a link road to the north of the town. The Council supports the work of key partners to investigate the possibility of a northern bypass, to address the issue of:

- i. central east-west movement;
- ii. movements within and around the north of Ipswich; and
- iii. the capacity of the A14, particularly around the Orwell Bridge.

8.250 The Council will work with neighbouring authorities and Suffolk County Council to ensure that the merits and delivery options for some form of northern bypass are fully investigated. It is recognised that any such route would be within the East Suffolk Council and Mid Suffolk District Council areas (i.e. not between the Ipswich Garden Suburb - policy CS10 - and Westerfield village) and therefore it is not practical to include such a route within this Strategy. However, the Council will encourage those authorities, together with Suffolk

County Council and other interested parties, to actively investigate such a route, and would be prepared to contribute to any such investigation. Public consultation into possible routes for such a road has taken place.

- 8.251 A further issue is that of access by heavy vehicles to Ipswich Port, which is essential for its ongoing viability. At present vehicles often approach from the A14 via Nacton Road and Landseer Road and this causes disturbance problems for local residents living along the roads. In the First Deposit Draft Local Plan in 2001, the Council proposed a new link road from the port to a new junction with the A14. This attracted significant objection. The Council considers that this East Bank Link Road is unlikely to be deliverable over the plan period because public funding is not available and the Highways England is opposed to additional junctions on the A14. Therefore the Council does not propose to allocate a New East Bank Link Road within the Plan.
- 8.252 The Local Transport Plan (LTP) is a programme of transport works prepared by the Highway Authority. It is used to set out a strategic overview of transportation needs, and an implementation plan. The current LTP covers the period 2011 to 2031 and is under review.
- 8.253 This policy supports objective 6 of the plan.

# Part C: Development Management Policies

# CHAPTER 9: Development Management Policies

This chapter sets out borough wide development management policies. Site specific policies are set out in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.

In setting out the development management policies below, the Council has been particularly mindful of the following three factors:

- the clear government guidance that development management policies should not just repeat what is already contained within national policy (and in some cases legislation) - i.e. policies should be distinctive to Ipswich;
- the policies set out within the Ipswich Local Plan 2017; and
- the comments received during the previous round of consultation.

## SUSTAINABLE DEVELOPMENT

### POLICY DM1:

### Sustainable Construction

**New residential development will be required to meet a high standard of environmental sustainability.**

**The following standards should be achieved as a minimum unless, in exceptional circumstances, it can be clearly demonstrated that this is either not feasible or not viable:**

- CO2 emissions of 19% below the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations (Part L); and**
- The water efficiency standards of 110 litres/person/day as set out in Requirement G2, Part G of Schedule 1 and regulation 36 to the Building Regulations 2010, as amended.**

**Development will also be expected to incorporate sustainable drainage and water efficiency measures as required by DM4. Surface water should be managed as close to its source as possible. This will mean the use of Sustainable Urban Drainage systems including measures such as green or blue roofs, soakaways and permeable paving.**

**The Council will also encourage non-residential development of 500 sq m and above to achieve a minimum of BREEAM Very Good standard or equivalent.**

- 9.1.1 New development in Ipswich has the potential to increase carbon dioxide emissions in the borough. If we are to achieve national carbon dioxide reduction targets, it is crucial that planning policy limits carbon dioxide emissions from new development and supports sensitive energy efficiency improvements to existing buildings. In an effort to further reduce the need to travel the introduction of a communications network infrastructure, capable of delivering at least superfast broadband, is supported as part of the build process.
- 9.1.2 The East of England is particularly vulnerable to the effects of climate change, which, considered in combination with the high level of planned development here with its potential contribution to emissions and water use, means that adapting and addressing climate change is a particularly urgent and challenging issue for the region.
- 9.1.3 The National Planning Policy Framework sets out how local planning can best support the achievement of sustainable development. Specifically it requires that local planning authorities

plan with a presumption in favour of sustainable development. The aim of local planning authorities should be to adopt proactive strategies to mitigate and adapt to climate change and a move towards a low carbon future.

- 9.1.4 Under the 2008 Planning and Energy Act local planning authorities may require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In accordance with the provisions of the March 2015 Ministerial Statement<sup>6</sup>, the Council will expect new build residential development to achieve a 19% improvement in energy efficiency over the 2013 Target Emission Rate.
- 9.1.5 The East Anglian area is identified as an area of 'severe water stress'. Lowering water demand is identified as one of a range of measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. In light of this the Council will require new residential development to meet water efficiency standards of 110 litres/person/day (as provided for in the Requirement G2 and Reg36 from Part G of Schedule 1 and regulation 36 to the Building Regulations 2010, as amended - rather than the Building Regulations requirements of 125 litres/person/day.) This conforms to the Anglian Water standard which Anglian Water is currently extending to local authorities as a supply target.
- 9.1.6 Climate change predictions suggest that Ipswich may experience increased instances of flooding risks, during hotter drier summers and warmer wetter winters. Green and blue roofs\* are key measures in the delivery of effective sustainable drainage systems. They help to reduce the amounts of storm water run-off and attenuate the peak flow during a storm. Living roofs can also reduce the negative effects of climate change, for example by improving a building's energy balance and reducing carbon emissions. Further benefits of green roofs include supporting biodiversity and town centre habitat and they should be considered an important part of a well-designed scheme. [\*please see glossary.]
- 9.1.7 The policy provides for some flexibility in exceptional circumstances where it can be clearly demonstrated that achieving the required standard for the type and scale of development in question would either be not feasible or not viable in the light of such considerations as heritage assets, site constraints, other planning and building regulations requirements, other development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to lower energy efficiency standards being achieved having regard to other merits of the scheme in terms of sustainability and urban design. Development will still need to meet the requirements of the Building Regulations in force at the time.
- 9.1.8 In relation to the achievement of BREEAM standards, developers will be encouraged to submit Design Stage Assessments and Post Construction Reviews, carried out by a qualified BREEAM assessor (as appropriate), for all planning applications for qualifying development. It will be expected that planning applications also be accompanied by a sustainability statement that explains and illustrates how sustainability considerations have influenced scheme design.
- 9.1.9 The Building Research Establishment is introducing a Home Quality Mark which is five star rating demonstrating a home's performance in terms of a number of factors including energy use, running costs, air quality, noise, accessibility to amenities, fast and secure internet access and the ease of use of the home by the occupants. The Council encourages applicants to consider achieving a high rating under the Housing Quality Mark (five star).
- 9.1.10 As part of sustainable construction adoption, developers should meet the highest standards of internal insulation to assist in minimising energy consumption. This is particularly important for applications involving the sub-division of dwellings.

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<sup>6</sup> Planning Update March 2015 (Ministerial Statement)

## **POLICY DM2: Decentralised Renewable or Low Carbon Energy**

**All new build development of 10 or more dwellings or in excess of 1,000 sq. m of other residential or non-residential floorspace shall provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources. Only if it can be clearly demonstrated that this would not be technically feasible or financially viable, then the alternative of reduced provision and/or equivalent carbon reduction in the form of additional energy efficiency measures will be required. The design of development should allow for the development of feed in tariffs.**

- 9.2.1 This policy gives effect to Core Strategy policy CS1. It builds on national policy in the National Planning Policy Framework which states that planning plays a key role in supporting the delivery of renewable and low carbon energy.
- 9.2.2 Given the acknowledged vulnerability of the region to the effects of climate change and the projected levels of development Ipswich will be required to accommodate, the Council considers it reasonable to require new developments above the given threshold to provide a minimum of 15% of energy demand from renewable or low carbon sources. The Planning and Energy Act 2008 allows planning authorities to require a proportion of energy used in development in their area to be energy from renewable or low carbon sources in the locality of the development.
- 9.2.3 The policy is worded to permit a reasonable degree of flexibility to developers as to how the requirement may be met. In this regard, energy from either renewable or low-carbon technologies and from sources that are either on- site or off-site in the locality of the proposed development, could be considered acceptable. The design of such developments should allow for the export of electricity back to the grid (i.e. 'feed in').
- 9.2.4 The policy also provides for some flexibility where it can be clearly demonstrated that achieving the required percentage provision of renewable or low-carbon energy would not be either technically feasible or financially viable in the light of such considerations as site constraints, other planning requirements, development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower percentage provision being achieved where the introduction of additional energy efficiency measures (i.e. additional to those required under policy DM1 such as passive house design or other inbuilt energy efficiency measures) to achieve an equivalent reduction in carbon emissions.
- 9.2.5 The Council will support proposals for low and zero carbon technologies where they are complementary to the existing environment without causing any significant adverse impacts, particularly relating to the residential amenity, landscape and visual impact, transport, flora and fauna, noise and air quality, unless those impacts can be appropriately mitigated.

## **POLICY DM3: Air Quality**

**The Council will ensure that the impact of development on air quality is mitigated and ensure that proposals do not negatively impact on existing air quality levels in the Borough.**

**The Council will take into account the impact of air quality when assessing development proposals, through consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.**

**Development proposals should not:**

- a) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;**
- b) reduce air quality benefits that result from the Borough Council's activities to improve air quality; and**
- c) create unacceptable risk of exposure to high levels of poor air quality, for example, through having a negative impact on an existing AQMA.**

**An Air Quality Assessment (AQA) will be required where development proposals are likely to expose residents to unacceptable levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.**

**Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.**

**Development should be consistent with the actions identified in the Council's Air Quality Action Plan, where appropriate.**

- 9.3.1 The focus of Policy DM3 is to mitigate the impact of development on air quality and to ensure exposure to poor air quality is reduced in the Borough.
- 9.3.2 Ipswich has 5 Air Quality Management Areas (AQMA) and therefore developers must give careful consideration to the air quality impacts of their proposed development. Plan 7 identifies the 5 AQMA in Ipswich.
- 9.3.3 The Council produces an Air Quality Action Plan every 5 years identifying actions and mitigation measures to be implemented by the Council and partners to reduce emissions. The Annual Status Report (ASR) which monitors progress on actions is produced annually and is regularly monitored through a Steering Group of officers across the Council. The Council is also preparing a Low Emissions Strategy Supplementary Planning Document (SPD) which will be a material planning consideration in taking decisions on planning applications.

9.3.4 The Council will require Air Quality Assessments (AQA) where the development would:

- Significantly affect traffic in the immediate vicinity of the proposed development site or further afield. This could be by generating or increasing traffic congestion; significantly changing traffic volumes, vehicle speed or both; or significantly altering the traffic composition on local roads.
- Introduce new point sources of air pollution;
- Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in existing designated or proposed AQMA's
- Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations;
- Affect biodiversity. In particular, is it likely to result in deposition or concentration of pollutants that significantly affect a European-designated wildlife site, and is not directly connected with or necessary to the management of the site, or does it otherwise affect biodiversity, particularly designated wildlife sites.

9.3.5 The AQA must outline the baseline predicted and forecast pollutant concentrations at the proposed development and the planned mitigation measures. The AQA should also consider wider cumulative impacts on air quality arising from a number of smaller developments.

9.3.6 Where an AQA shows that development would cause harm to air quality, planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels. Mitigation measures should be provided on-site, however where this is impractical the AQA should demonstrate that it is possible to include measures in the local area which have equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement where appropriate.

9.3.7 Examples of mitigation include:

- the design and layout of development to increase separation distances from sources of air pollution;
- using green infrastructure, in particular trees, to absorb dust and other pollutants;
- means of ventilation;
- promoting infrastructure to promote modes of transport with low impact on air quality
- controlling dust and emissions from construction, operation and demolition; and
- contributing funding to measures, including those identified in air quality action plan, designed to offset the impact on air quality arising from new development.

## **POLICY DM4: Development and Flood Risk**

**Development will only be approved where it can be demonstrated that the proposal satisfies all the following criteria:**

- a. it does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development and wherever practicable appropriate application of Sustainable Drainage Systems (SuDS);**
- b. that no surface water connections are made to the foul system and connections to the combined or surface water system is only made in exceptional circumstances where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments);**
- c. that adequate sewage treatment capacity and foul drainage already exists or can be provided in time to serve the development;**
- d. it will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy;**
- e. it is and will remain safe for people for the lifetime of the development; and**
- f. it includes water efficiency measures such as water re-use, stormwater or rainwater harvesting, or use of local land drainage water where practicable; and**
- g. It does not have any adverse effect on European and Nationally designated sites in terms of surface water disposal.**

9.4.1 It is recognised that the need to reduce flood risk in Ipswich is essential to ensure accordance with guidelines set out in national government policy on development and flood risk, the National Planning Policy Framework. This includes planning for the effects of increasing rainfall intensities and sea levels. As a result of the Pitt Review and the Flood and Water Management Act 2010, much more emphasis will be placed on planning for flooding in future than previously.

9.4.2 The Council will apply the NPPF hierarchy for managing flood risk i.e.:

**TABLE 7**

<b>HIERARCHY</b>	<b>EXPLANATION</b>
1. Assess	Strategic Flood Risk Assessment (SFRA) and site-specific Flood Risk Assessment (FRA).
2. Avoid	Layout should be designed so that the most vulnerable uses are restricted to higher ground at lower risk of flooding, with more flood-compatible development (parking, open space etc.) in the highest risk areas. Use Sustainable Drainage Systems (SuDS) at source.
3. Substitute	Apply the sequential approach to locate more vulnerable development in lowest risk areas.
4. Control	Use SuDS and implement Surface Water Management Plans (SWMP) to manage and reduce risk.

- 9.4.3 Flood risk management should be considered in all developments before site layouts are planned. It is necessary to locate development away from a risk of flooding and sequentially preferable sites will be those in Flood Zone 1 suitable for the development proposed, with planning permission and/or allocated for residential development in planning policy, and which are genuinely available. Highly vulnerable, more vulnerable and less vulnerable development will not be permitted in Flood Zone 3b (functional flood plain). Highly vulnerable development will not be permitted in Flood Zone 3a. Flood Zones 2 and 3 are shown on Plan 2.
- 9.4.4 The Ipswich Level 2 SFRA provides the necessary information to help facilitate the sequential approach as outlined in the NPPF. Site-specific Flood Risk Assessments (FRAs) are required for all development in Flood Zones 2 and 3, and for all sites over 1ha in size. The SFRA also provides additional guidance and information for locations where site-specific Flood Risk Assessments (FRAs) will be required as part of the development process. This includes certain sites in Flood Zone 1, which may be less than 1 ha. The SFRA also considers the effects of development on local flooding and minor watercourses and identifies mitigation measures including SuDS.
- 9.4.5 SuDS are an important method of reducing flood risk associated with development and are an essential element of any development in the Borough wherever practicable. Layout and form of buildings and roads must be designed around SuDS bearing in mind SuDS should be sited in lower areas, but preferably close to source, making use of topography. SuDS on contaminated land should be lined and designed to attenuate water on or near the surface.

- 9.4.6 The preferred method of surface water disposal is through the use of SuDS. In new development and redevelopment, surface water connections to the foul system and to the combined or surface water system should only be made in exceptional circumstances where it can be adequately demonstrated that there are no feasible alternatives. It is also important that there is existing sewage treatment capacity and foul drainage exists or that it is capable of being included in time to serve standards where practicable. This will be agreed in consultation with the relevant water and sewerage undertakers
- 9.4.7 The SFRA also identifies key surface water flood paths and watercourses (flow routes) and areas at risk of flooding. These are to be safeguarded for the future by protecting them from development and other obstruction. Development proposals should design for key flow routes. Surface water management plans will be able to facilitate this.
- 9.4.8 Site-specific FRAs may therefore be required to consider such issues, most likely aiming to identify the extent of the flow route, water levels and frequency so that appropriate site layouts and floor levels can be planned. In the future SWMP and the SFRA may provide much of this information.
- 9.4.9 SuDS standards and policies are currently set out in the Council's Drainage and Flood Defence Policy as referred to in the Development and Flood Risk SPD. In terms of surface water flooding and drainage, the adopted standards specified in criterion b are the minimum standards set out in the Suffolk Flood Risk Management Strategy (Appendix A). The adopted standards for fluvial and tidal flooding as set out in the Development and Flood Risk SPD will also need to be met. In the future it is expected that National Standards will be followed.
- 9.4.10 The Council's Level 2 SFRA provides information relevant to both the existing tidal/fluvial defences at 2011 and also to the completed defences, with the proposed barrier in place. In each case the SFRA provides data on residual risks taking account of flood depth and the velocity of floodwater. The preparation of many site-specific FRAs can make use of mapped risks from the new SFRA. However in some instances, site-specific FRAs will still need to include detailed flood modelling to ascertain the flood risk
- 9.4.11 FRAs for proposals in Zones 2 and 3 need to clearly state the frequency of flooding in and around the site and will need to ensure that they include the impact of the implementation of the EA's flood defence barrier.
- 9.4.12 More vulnerable and less vulnerable development sited in Flood Zones 2 and 3a, as defined in the NPPF, may be acceptable. However FRAs will be required to demonstrate that such developments will be 'safe' in accordance with the Development and Flood Risk SPD and consider flood risk from other sources. The assessment will follow the NPPF and its supporting technical guidance note. Planning permission will not be granted if submitted details do not comply with the Safety Framework. In addition, permissions should not be granted if emergency responders are concerned about their capabilities/plans.
- 9.4.13 Basements or lowered ground levels around buildings will increase flood risk to people contrary to the aims of the NPPF. Basements are particularly vulnerable to all types of flooding. Basement dwellings will not be permitted where the floor level is below 0.1% AEP tide level in 100 years' time. Basement dwellings will not be permitted in 'Areas Susceptible to Surface Water flooding'. Basements in Flood Zone 1 will only be permitted subject to adequate FRAs, which must address groundwater, sewer and overland flood sources.

- 9.4.14 FRAs will be required for any land raising including impacts on Surface Water flood risk. No raising of ground levels should be permitted around the Wet Dock that would impede Surface Water flood paths from Bridge Street, Key Street, Fore Street and Coprolite Street to the Wet Dock.
- 9.4.15 The Anglian River Basin Management Plan sets a requirement for Local Government to consider the impact on hydromorphology when preparing spatial plans. Ipswich also has sites of International and National Importance wholly or partly within its boundary. Consequently, it is imperative that development does not have any adverse effect on European and Nationally designated sites in terms of how surface water is disposed of.

## **POLICY DM5: Protection of Open Spaces, Sport and Recreation**

**Development involving the loss of open space, sports or recreation facilities will only be permitted if:**

- a) the site or facility is surplus in terms of all the functions an open space can perform, and is of low value, poor quality and there is no longer a local demand for this type of open space or facility, as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) and subsequent update; or**
- b) alternative and improved provision would be made in a location well related to the users of the existing facility; or**
- c) the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.**

- 9.5.1 Open spaces and sports and recreation facilities are essential to the quality of life of Ipswich people and the quality of the town's environment. They can deliver social, economic and environmental values – public health and well-being, health and fitness, air quality, water flood management, help tackle climate change, regeneration, the image of the town, ecology nature and biodiversity, green transport and community cohesion, for example.
- 9.5.2 The Council will therefore protect them from development unless the particular circumstances set out in the policy apply. This accords with the National Planning Policy Framework (NPPF), which states that existing sites and facilities should not be built on unless an up to date assessment has clearly shown them to be surplus to requirements. Developers would be expected to engage with Sport England to ensure that the loss of the open space, sports or recreation facility will be acceptable, and this evidence would be expected to be presented at pre-application discussions and as part of any eventual application.
- 9.5.3 Developments involving the loss of open space, sports or recreation facilities that have been purposefully neglected to artificially lower their demand could, if otherwise well-maintained, be capable of meeting local need. In these circumstances, applications will need to demonstrate that there is no longer a local demand for this type of provision or other form of related use. The local demand catchment will depend on the amount and quality of alternative provision available in the wider area.
- 9.5.4 The Council has carried out an open space, sport and recreation facility audit and needs assessment, as required by the NPPF. This identifies the typology of open spaces, sport and recreation facilities, assesses the quantity and quality of provision in Ipswich and sets out standards for the quantity, quality and accessibility of provision. The typology, together with the quantity and accessibility standards, is reproduced in Appendix 4. Quality standards can be found in the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) and subsequent update as a result of the Council's Open Space and Biodiversity policy. The need for formal sports provision is identified through the 2009 Open Space, Sport and Recreation Study, and is being updated by the production of the Indoor Sports Facility Strategy and the Playing Pitch Strategy. This will inform consideration of whether a facility is surplus and where/what alternative provision may be appropriate.
- 9.5.5 The Study examines provision by type in each of the Area Committee areas of Ipswich. Although provision in Ipswich is generally good, there are existing deficits in some areas.

## **POLICY DM6: Provision of New Open Spaces, Sport and Recreation Facilities**

**In all new residential developments of 10 dwellings or more (or on sites of 0.5ha or more), the Council will require provision of high-quality open spaces, sport and recreation facilities to meet the needs of their occupiers. The types and required standards of these spaces and facilities are identified in Appendix 4.**

**There will be a preference for on-site provision where practicable, however off-site contributions may be appropriate depending on the size of the site and the level of existing provision within its walking catchment. If there are deficits of certain types of open spaces or facilities within the walking catchment of the development site, meeting these needs should be prioritised. Standards for children's and young people's facilities will be not be applied to elderly persons' accommodation and nursing homes.**

**The design and layout of spaces and facilities should be delivered in accordance with the detailed design criteria set out in the Public Open Spaces Supplementary Planning Document (SPD) (2017) and the most up-to-date guidance in Secured By Design. The delivery of open space provision will not be a substitute for high-quality landscaping within new development. New open spaces, sport and recreation facilities should provide ecological enhancements as part of their design and implementation.**

**There may be circumstances where development would more suitably accommodate greater provision of one typology at the expense of another. Such circumstances will be considered on their merits.**

**The effect of on-site provision and/or off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.**

**For non-residential developments of 1,000 sq. m floor space or more, contribution to public open spaces and outdoor sports facilities will be negotiated on a case by case basis. open space over and above site landscaping should be provided where appropriate, for the health and wellbeing of employees.**

**Public green spaces should be well overlooked by new properties, and the provision within large-scale developments should be meaningful, usable and distributed throughout the site.**

- 9.6.1 Access to high quality open space, sport and recreation facilities and public open space provision is important for the health and wellbeing of individuals and communities. The Council will seek provision of on-site open space and sports and recreational facilities where possible,

however the policy makes provision for instances where it is not practicable to include a type of open space or facility on-site. This will include factors where its provision would compromise other standards in this Plan, such as meeting the density requirements of Policy DM23 or the minimum garden sizes of Policy DM7.

- 9.6.2 At least 10% of the site area of all qualifying developments must consist of public green space, which shall include soft landscaping and tree planting to facilitate sustainable urban drainage and enhance the climate change resilience, appearance and biodiversity value of the development. In high density residential developments (defined in Policy DM23), the green space requirement will be a minimum of 15% of the site area, to compensate for the more limited amenity space in these developments and to provide an attractive setting for the buildings. The 10%/15% requirement will also contribute to the amenity green space and/or natural and semi natural green space standards as outlined in Appendix 4.
- 9.6.3 Where the provision for a type of space or facility would not meet the minimum size threshold described in the Ipswich Open Space, Sport and Recreation Facilities Supplementary Planning Document 2017, a qualitative assessment of existing provision should be made to determine whether an enhancement opportunity exists. Such provision should be achieved within the standard accessible distance from the site set out in Appendix 4. Where a reasonable improvement can be identified, a contribution should be secured by a planning agreement, where this would be necessary to make the development acceptable. Standards for children's and young people's facilities will not be applied to elderly persons' accommodation and nursing homes. It is expected that amenity green spaces in particular would be located on generally flat land in order to maximise their use. Where provision is distributed throughout large-scale developments, it is important that it adequately meets the intended use.
- 9.6.4 The costs of on-site provision and/or off-site enhancements will be material when considering a scheme's viability. However, where an under provision of open space, new facilities or other contributions is required to achieve scheme viability – that results in a poor environment for new residents will be deemed unacceptable.
- 9.6.5 The Council's Public Open Space Supplementary Planning Document (SPD) provides guidance on population forecasts from new developments and outlines the minimum size standard for each Appendix 4 typology. The surpluses and deficits of open spaces and facilities by area is set out in chapter 3 of the SPD. The document will also indicate per square metre capital and maintenance costs for each typology where these are to be provided and/or maintained by the Council, and to guide in lieu contributions for new off-site provision. Where a contribution is secured to enhance an existing area of open space or facility, this sum will be based on the works required and in proportion to the scale of the development.
- 9.6.6 The quality standards for the various typologies are identified by the Ipswich Open Space, Sport and Recreation Study, Play Strategy, Allotment Strategy and Open Space and Biodiversity Policy/Strategy, and any subsequent updates to these. Furthermore, the need for formal sports provision is currently being updated by the production of the Indoor Sports Facility Strategy and the Playing Pitch Strategy.
- 9.6.7 The provision of new open space should take account of the relevant Secured By Design guidance, in particular:
- Having clear boundaries between public and private spaces;
  - Not to immediately abut residential properties;
  - To avoid locating such facilities at the rear of dwellings;
  - To ensure that small children's play areas can be made secure at night; and
  - To ensure that the provision of any informal spaces aimed at young people considers comments made by the Designing Out Crime Officer.

- 9.6.8 Where possible, green spaces should provide for wildlife habitats designed and located so as to create a link with existing ecological networks and/or green corridors, which may include the proposed green trail around Ipswich for sites on the edge of the Borough. All planting proposals should be accompanied by an appropriate management plan. Within IP-One, the provision of a public civic space may be considered in lieu of green space where this makes a positive contribution to the townscape.
- 9.6.9 Accessible natural greenspace is defined by Natural England as places where human control and activities are not intensive so that a feeling of naturalness is allowed to predominate. There is no local standard for the provision of strategic accessible natural green space ('ANG') per person or dwelling. However, the mapping of existing provision against the 'Nature Nearby' standards has identified areas of deficit, particularly across north west Ipswich. The Council will aim to address these deficits where it can be achieved through also meeting the local standards for natural and semi-natural greenspace.
- 9.6.10 The Local Plan does not stipulate a minimum requirement for open space provision for non-residential development, due to the potential needs of workers being different from the needs of residents. However, where appropriate, open space over and above site landscaping should be provided for the health and wellbeing of employees. Standards in Appendix 4 are applied on the basis of the total number of full-time equivalent employees.

**POLICY DM7:  
Provision of Private Outdoor Amenity  
Space in New and Existing Developments**

To ensure that new residential developments deliver a high quality and environmentally sustainable living environment, developments will be required to incorporate well-designed and located private outdoor amenity space of an appropriate type and amount which should also contribute to the improvement of biodiversity.

Provision will be in accordance with the following standards:

- For all houses, bungalows, or ground floor maisonettes with 3 or more bedrooms a minimum private garden area of 75 sq. m.
- For all houses, bungalows, or ground floor maisonettes with 1 or 2 bedrooms a minimum private garden area of 50 sq. m.
- For all apartments or upper floor maisonettes an average of 25 sq. m of private outdoor amenity space.

All private gardens and other outdoor amenity spaces should be safely accessible to occupants, designed to take advantage of sunlight and daylight and provide a functional space having regard to the mix of housing/types to be provided. In this regard the principles within the Space and Design Guidelines SPD should be applied.

Should this requirement unavoidably conflict with the need to meet other density and urban design requirements of the plan or an applicant is able to demonstrate that a lower figure would be acceptable having regard to the particular circumstances of the proposals the Council will expect applicants to demonstrate that adequate provision of private outdoor amenity space will be provided for the occupants of the proposed dwellings.

In existing development, unless an alternative provision can be identified to compensate for the loss, proposals for extensions or other development that reduces the available private outdoor amenity space to an area that falls below the appropriate standard will be refused.

- 9.7.1 The Council considers that, in addition to the provision of well-planned public spaces, the provision of high quality private outdoor amenity space for all types of new residential development is an essential component of high quality design. Such space is needed for sitting out socialising, play, drying washing, and gardening (flowers and food) and is key to the creation of a sustainable residential environment in terms of:
- its contribution to liveability and to urban greening
  - the preservation and/or enhancement of local biodiversity and
  - ecological networks.
- 9.7.2 In most developments of houses and bungalows, the Council will expect private garden space to be provided to the rear of the dwelling. Exceptions may be made for corner and infill plots.
- 9.7.3 Garden sizes need to be sufficient to accommodate most household activities and at the same time be adequate to offer visual delight, receive some sunshine, and encourage plant growth. The BRE report "Site Layout for Daylight and Sunlight" recommends that no more than two fifths and preferably no more than a quarter of the garden should be prevented by buildings, walls or fences from receiving sunshine on 21 March. Garden sizes need to be calculated independently of any parking space(s) to be provided.
- 9.7.4 A suitably designed 75 sq.m private garden should be capable of achieving the above requirements for a three-bedroom or larger house.

- 9.7.5 Smaller properties are less likely to be occupied by families with children and may reasonably function with a smaller rear garden of at least 50 sq. m. It should be noted that for both sizes of dwellings, gardens may need to exceed the minimum size specified in the policy where they need to accommodate soakaways.
- 9.7.6 Key characteristics of well-designed private amenity space include: (i) a well shaped (rectangular), useable area having good accessibility and a well planned relationship to the internal living spaces within the dwelling; (ii) provision for a private sitting out area not directly overlooked by any window of a neighbouring property either at ground or first floor; (iii) high standards of security and privacy with clear delineation of public and private space and rear gardens typically bounded by fencing and hedging; (iv) a reasonable outlook; and (v) access to direct sunlight for part of the space for at least part of the day.
- 9.7.7 The Council's Development Control Policies and Space and Design Guidelines supplementary planning document, which addresses matters such as spacing between dwellings, will apply. The garden standards set out in the policy will equally apply to existing gardens remaining after garden severance.
- 9.7.8 The Council considers that in the case of low-rise housing development conventional rear gardens remain the best option for private amenity space. For apartment schemes and other forms of higher density development an imaginative combination of gardens (private and communal), terraces, roof-gardens, and balconies should be considered. In addition to functional benefits, well-designed and fully integrated outside space can enhance the architectural quality and interest of a scheme.
- 9.7.9 Apartment schemes may typically choose to provide a combination of communal gardens for use by all residents together with private balcony spaces or terraces for use by individual households. All balconies should be well-designed, positioned where they are convenient and comfortable to use, and large enough to accommodate a table and four chairs to suit the occupancy of the flat as well as some additional space for plants (a minimum size of 5 sq. m is a useful guide in this regard).
- 9.7.10 Poorly designed areas of grass to the rear of blocks of flats will no longer be an acceptable way of providing communal gardens. These spaces are rarely private and are often overshadowed by tall buildings. Private communal gardens therefore need to be:
- of sufficient size to be useable;
  - secure and private;
  - well-designed and integral to the character of the development;
  - providing a combination of sun and shade, particularly during the summer months of the year; and
  - Only accessible to its private residents
- 9.7.11 Residential extensions or other types of development which causes private outdoor amenity space to fall below the expected standard will be refused. However, the Council will consider cases on their merits where an applicant is able to demonstrate that there are appropriate and usable alternative provisions available, close at hand.

## **POLICY DM8: The Natural Environment**

All development must incorporate measures to provide net gains for biodiversity.

Proposals which would result in significant harm or net loss to biodiversity, having appropriate regard to the 'mitigation hierarchy', will not normally be permitted.

### **Sites of International and National Importance**

Proposals which would have an adverse impact on European protected sites will not be permitted, either alone or in combination with other proposals, unless imperative reasons of overriding public interest exist in accordance with the provisions of the European Habitats Directive.

Sites of Special Scientific Interest (SSSI) will be protected from development, which directly or indirectly would have an adverse effect on their natural value. An exception will only be made where a proposed development:

- a. could not be located on an alternative site that would cause less harm;
- b. would deliver benefits that clearly outweigh the impacts on the site's special interest and on the national network of such sites; and
- c. would compensate for the loss of natural capital.

### **Local Nature Reserves and County Wildlife Sites**

Planning permission will not be granted for development that would result in damage or loss in extent or otherwise have a significant adverse effect on Local Nature Reserves or Local Sites (locally designated County Wildlife Sites and geological sites), unless the harm can be mitigated by appropriate measures.

Enhancements for protected sites will be required from new development.

### **Priority Habitats and Species**

Development which could harm, directly or indirectly, species, which are legally protected, or species and habitats that have been identified as Species or Habitats of Principal Importance in England (also known as Section 41 or 'Priority' species and habitats) will not be permitted unless the harm can be avoided or mitigated by appropriate measures.

Development must include enhancements for protected and priority species as part of their design and implementation.

### **Enhancing Ecological Networks**

The Council will enhance the ecological network across the Borough as identified on Plan 5. The designated sites are ranked 1 and 2 High Conservation Value. Within the remaining core

**areas of the ecological network and the corridors which link them, development proposals will be required to have regard to existing habitat features and the wildlife corridor function, through their design and layout, and achieve net biodiversity gains commensurate with the scale of the proposal, through measures such as retaining existing habitat features, habitat restoration or re-creation and comprehensive landscaping, which is appropriate to local wildlife. Development which that would fragment the corridor function will not be permitted unless there is adequate mitigation.**

**Within the buffer zones around core areas and corridors, development will be required to enhance the ecological network, through measures such as wildlife beneficial landscaping.**

- 9.8.1 The overall aim of this policy is to contribute to the international and national objective to halt the overall decline in and to improve biodiversity, by the protection and creation of key habitats; and the maintenance of linked, coherent ecological networks, so that populations of species are not isolated.
- 9.8.2 European sites include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These sites are protected under the Birds and Habitats Directive (92/43/EEC). The Stour and Orwell Estuaries SPA and Ramsar site lies partly within Ipswich Borough. Policy ISPA3 (Cross-boundary mitigation of effects on Protected Habitats and Species) sets out the Council's approach to working with other authorities and stakeholders to address the requirement of the Recreational Avoidance and Mitigation Strategy and implementation of mitigation measures across the Ipswich Strategic Planning Area. Listed or proposed Ramsar sites, potential SPAs and possible SACs and sites required in relation to compensatory measures for adverse effects on European sites are afforded the same level of protection as SACs and SPAs through the NPPF. The Conservation of Habitats and Species Regulations 2017 (as amended) set out requirements in relation to assessing projects that could potentially affect a European site. Where a significant effect on a European site cannot be ruled out proposals will need to be accompanied by an Appropriate Assessment. The assessment should be carried out in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). Where the assessment concludes negative effects on a site's integrity permission should only be granted where there are no alternative solutions and where the project must proceed due to imperative reasons of over-riding public interest. The source-pathway-receptor model will be used to assess the effects of proposed development on European sites. Assessments under the Habitats Directive have been undertaken in relation to the production of the Core Strategy and Policies DPD Review and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD. Mitigation measures have been identified and in some instances developer contributions may be sought in relation to these and/or additional mitigation measures identified through assessments at planning application stage.
- 9.8.3 The Stour and Orwell Estuaries are a Site of Special Scientific Interest (SSSI) as well as a Special Protection Area and Ramsar site. Bixley Heath and Stoke Tunnel Cutting SSSIs are nationally important heathland and geological sites respectively. In addition, there are 20 County Wildlife Sites and 9 Local Nature Reserves that are wholly or partly inside the Borough boundary. Many species are protected through specific legislation including the Wildlife and Countryside Act 1981 (as amended). England's priority species and habitats are those which are included on the list produced under Section 41 of the Natural Environment and Rural Communities Act 2006. Suffolk's priority species and habitats are identified in the Suffolk Biodiversity Action Plan.
- 9.8.4 As part of the overall package of securing measurable net gains for biodiversity, development will be required to include measures to support the protection and recovery of protected and priority species. Measures to enhance protected and priority species for minor and major development may include habitat creation, restoration or connection of fragmented habitats. For householder developments measures may include integrated swift boxes, bat boxes, hedgehog highways or other measures that are found to protect and recover protected and

priority species. The Government guidance 'Protected species: how to review planning applications' provides standing advice and measures for protected species.

- 9.8.5 The mitigation hierarchy requires consideration firstly to be given to avoiding any harm to biodiversity. Where harm cannot be avoided consideration should be given to mitigating any effects and, finally, if sufficient mitigation cannot be achieved compensation measures should be undertaken. Net loss will be considered in terms of population size or loss of extent of BAP habitat or other feature for which the site was designated. In some instances it will be necessary to relocate species to an alternative location. Where this is the case the receptor location will need to be suitable for the type and number of species to be relocated and monitoring will need to ensure that the receptor location remains suitable. The British Standard Guidance 'Biodiversity: Code of Practice for Planning and Development (BS42020)' provides an approach to dealing with biodiversity issues in development.
- 9.8.6 The NPPF promotes the identification of local coherent ecological networks. Plans need to distinguish between the hierarchy of international, national and locally designated sites and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. Valued landscapes need to be protected and enhanced along with sites of biological or geological value and soils in a manner commensurate with their statutory status. The original NPPF (2012) included a requirement to provide net gains in biodiversity 'where possible'. However, 'where possible' was removed in the revised NPPF (2019) and therefore there is now a requirement in national policy to provide net gains for biodiversity. The Government's 25 Year Environmental Plan (2018) and Environmental Bill (2019) have also reaffirmed this as a mandatory requirement.
- 9.8.7 An ecological network is defined as a collection of high quality and biodiverse habitats linked by ecological connections between them that enable species to move. The connections may be continuous corridors or stepping stones. Enabling species to move between sites makes them more resilient to change and improves their long term viability in the face of challenges such as climate change.
- 9.8.8 The links may consist of roadside verges, railway lines or even areas covered by private gardens. Planning control does not extend to the management of such spaces, but there is advice available, for example on how to improve the attractiveness of gardens to wildlife and the Council's Parks and Open Spaces Team provide activities which support and encourage this. The policy reflects national strategic priorities in the 25 Year Environmental Plan (2018) and the NPPF, and local strategic priorities in terms of developing ecological networks. Reference should be made to the information and recommendations of the Wildlife Audit in relation to any proposals on, or that may affect, sites identified within it.

The Ipswich ecological network consists of:

- core areas of high ecological value, which form the heart of the network – these are primarily the internationally, nationally, and sub-regionally designated biodiversity sites (ranked 1 – 2 in the Ipswich Wildlife Audit). Internationally designated biodiversity sites are protected by statute. Core areas also include sites ranked 3 - 4 through the Ipswich Wildlife Audit, some of which are also allocated for development. This is not considered incompatible with their ecological network role, as careful design and layout can retain or enhance appropriate elements of habitat. Core areas 5 and 6 currently have low or no nature value but future development may provide an opportunity to provide enhancements for biodiversity and the ecological network as a whole;
- core area buffer zones, which surround core areas and stepping stones, to protect them from adverse impacts - these vary in width from 400m around international and national sites to 100m around Biodiversity Action Plan habitats and non-designated sites. Whilst buffers around designated sites are useful to minimise direct impacts, other longer distance impacts, such as recreational disturbance, may require additional mitigation in

the case of European sites and the source-pathway-receptor approach is a general model that can be applied to any potential effect to identify impact;

- corridors and stepping stones, which improve connectivity between core areas enabling species to move, feed, disperse, migrate or reproduce; and
- corridor buffer zones, many of which cover existing built up areas, where encouragement will be given to enhancing the corridor function where possible.

9.8.9 Ecological networks do not respect administrative boundaries and, therefore, the Council will work with partners in the Ipswich Strategic Planning Area to ensure that networks connect across and around district and borough boundaries.

9.8.10 Although the identified ecological network and buffer areas will be the priority for enhancement, the 'white' areas on Plan 5 are also important for wildlife. This is particularly the case for more mobile animals such as birds and flying insects. Here measures such as wildlife gardening, verge and green space management and planting street trees could greatly enhance its value to wildlife and help to extend the network identified on the map and will be encouraged where possible.

9.8.11 Local Geological Sites, known within Ipswich Borough as Regionally Important Geological and Geomorphological Sites (RIGS) and County Geodiversity Sites are designated on the basis of locally developed criteria. They are the most important sites for geology or geomorphology outside statutorily protected sites such as SSSIs.

9.8.12 It is important that planning decision are based on up to date ecological reports and survey data. In some instances, there will be national or species specific guidance on this, however in circumstances where such advice does not exist CIEEM advise that ecological reports and data which is more than three years old is unlikely to be valid. Reports conducted between eighteen months to three years previous, will require a clear statement from a professional ecologist on the validity of the report, which, if any, surveys need to be updated and the appropriate scope, timing and methods for the survey update(s).

## **POLICY DM9: Protection of Trees and Hedgerows**

**The Council will protect existing trees and seek to secure additional trees that increase canopy cover in the interests of amenity and biodiversity by:**

- a. making Tree Preservation Orders;**
- b. only granting consent for felling, topping, lopping or uprooting if a sound arboricultural reason is provided to accompany applications;**
- c. adhering to the principles of BS3998 'Tree work – Recommendations' 2010 for established tree management options (including soil care and tree felling);**
- d. refusing planning permission for development resulting in the loss or deterioration of trees or vegetation of amenity, historic, cultural or ecological value unless the need for, and benefits of, the development in that location clearly outweigh the loss; and**
- e. encouraging tree planting to achieve a target of 22% canopy cover or better by 2050.**

**Planning permission for development resulting in the loss or deterioration of ancient woodland and ancient or veteran trees (irreplaceable habitats) will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.**

**Applications for development should retain existing trees and hedgerows of amenity or biodiversity value where possible. Where development affecting trees or hedgerows is proposed, the application must be accompanied by:**

- f. an accurate survey and assessment of all existing trees and hedgerows on site in accordance with BS5837 'Trees in relation to design, demolition and construction – Recommendations' 2012 by a competent arborist; and**
- g. details of protective measures to be put in place during the development process to ensure the health and safety of each specimen and hedgerow to be retained; and**
- h. where removal of a mature or semi-mature tree or hedgerow is proposed, a plan for replacement planting on a two for one basis or better and using semi-mature specimens, unless otherwise agreed by the Council.**

**Design in new development should have proper regard to the setting of protected trees. Landscaping and tree planting should be integrated into new development, including car-parking areas.**

**Where appropriate, new tree planting will be encouraged within landscaping schemes to increase the Borough's tree canopy cover. Soft landscaping shall include plants which encourage biodiversity, such as nectar rich plants.**

- 9.9.1 Trees are important elements of green infrastructure, contributing to urban cooling through evapotranspiration and providing micro-climatic effects that can reduce energy demands in buildings. They therefore represent a key resource that can significantly contribute to climate change adaptation. Whether viewed individually or collectively from a distance trees make an important contribution to the environmental quality of Ipswich. They contribute to the townscape, biodiversity, climatic river management and air quality. They also provide an important role in helping to keep rivers cool. This helps moderate extremes in water temperature which can be detrimental to fish spawning. Shading can also be helpful in the control of aquatic vegetation. The Council has signed 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, and back at the heart of our lives and communities.

### **Ancient woodlands, Ancient or Veteran Trees and Tree Preservation Orders.**

- 9.9.2 Ancient woodland and Ancient or Veteran Trees are identified as irreplaceable habitats in the NPPF (2018). Paragraph 175 of the NPPF explains that development resulting in the loss or deterioration of these habitats should be refused. This development will only be acceptable where there are wholly exceptional reasons, the basis of which is justified in footnote 58 of the NPPF.
- 9.9.3 Tree Preservation Orders (TPOs) are used by the Council to legally protect specific trees or groups of trees that provide public amenity. Cutting, lopping or removing any part of a tree subject to a TPO other than the removal of deadwood requires the Council's consent. Where a planning application relates to trees in conservation areas, the Council will pay special attention to the desirability of preserving or enhancing the character of that area. Where a tree in a conservation area is already protected by a TPO, we will apply the normal procedures and controls associated with a TPO. In other cases, a notification procedure exists (Section 211) unless an exception applies allowing the opportunity to consider whether to make a TPO on the tree. The felling of protected trees will only be permitted in exceptional circumstances and in accordance with relevant legislation, policy and guidance.

### **Replacement and additional planting**

- 9.9.4 Where loss of trees or vegetation of value cannot be avoided, the Council will require suitable replacements capable of providing at least equal amenity and ecological value. This may not always be possible or appropriate on the development site in question, and in such cases off site provision will be expected as an alternative. The Council will also expect development to incorporate additional trees and vegetation wherever possible. This should include large species trees where opportunities allow.
- 9.9.4 Tree planting and landscaping schemes on development sites should not be an afterthought. BS5837: 2012 provides guidance in respect of development sites, on tree retention, protection during development and incorporating trees into design of the development. The level of detail expected with a planning application should be appropriate to the scale of the proposal. We will take a right tree/ plant for the right site approach which takes account of:
- the amenity value of any trees to be removed,
  - ecology,
  - opportunities to retain existing and plant new appropriate native species or riparian trees where possible,
  - historic context,
  - availability of space,
  - soil conditions including hydrogeology,
  - potential improvements to air and soil quality,
  - reducing the effects of and adapting to climate change; and
  - the guidance provided in BS 8545 Trees: from nursery to independence in the landscape – Recommendations'.

### **Community woodlands**

- 9.9.5 Community woodlands offer valuable opportunities for improving the environment around Ipswich by upgrading the landscape and providing for recreation and wildlife. Any new development will need to take account of any community woodland plan in place at the time of a planning application.
- 9.9.6 Ipswich is signed up to the Urban Buzz Project and is committed to creating pollinator rich habitats to improve local open spaces and parks.

## **POLICY DM10: Green Corridors**

**The Council will seek to establish and enhance green corridors within the Borough and linking to adjacent open spaces and walking, cycling or riding routes.**

**Green corridors are identified broadly on Plan 6 in the following locations:**

- a. Between Bramford Lane Allotments and Whitton Sports Centre playing fields and grounds, Whitton Church Lane and adjoining countryside;**
- b. Between Christchurch Park, the Dales, playing fields north of Whitton Church Lane and adjacent countryside;**
- c. Between Christchurch Park, the Fonnereau Way, green infrastructure within the Ipswich Garden Suburb development area and open countryside beyond;**
- d. Between the Cemetery, Playing Fields at Tuddenham Road and adjacent countryside;**
- e. Between Woodbridge Road and Bixley Heath via St Clement's Hospital grounds;**
- f. Between Alexandra Park and Orwell Country Park and surrounding countryside via Holywells Park, Landseer Park and Pipers Vale;**
- g. Between the Gipping Valley path near Station Bridge and Belstead Brook Park and adjacent countryside via Bourne Park;**
- h. Between Gippeswyk Park, Belstead Brook Park and adjoining countryside;**
- i. Between Gippeswyk Park, Chantry Park and adjacent countryside; and**
- j. Between the Wet Dock and Sproughton Millennium Green and adjacent countryside along the river corridor.**

**Development within the green corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions. The Council will seek to establish attractive green links and to provide for public access wherever safe and practicable.**

**Opportunities will be sought to link existing green corridors into a more continuous network through the layout of new development, the provision of new open spaces or public realm improvement. Development proposals which break or disrupt an existing corridor without being able to form an acceptable and useable alternative route in the network will be refused.**

**A further "blue" corridor can be identified, comprising the length of the navigable River Gipping and River Orwell within the Borough. Development proposals which relate closely to river banks will be required to provide for the improvement of public pedestrian and cycle paths along the site boundary relating to the river where appropriate and should enhance its appearance. Development close to river banks should also include tree planting and ensure that an appropriately sized ecological buffer along the river is maintained. Development should seek to enhance public slipway access to the river, where practicable.**

**The Council will seek to establish and extend a publicly accessible green trail around the edge of the Borough as illustrated on Plan 6 in order to address the need within the Borough for access to Natural and Semi Natural Greenspace. The green trail will provide an ecological corridor and a recreational resource for people to use. Development at the edge of the built up area will be required to provide links within the green trail as part of their on-site open space provision.**

9.10.4 This policy adds detail to the strategic approach set out in policy CS16, by broadly identifying green corridors (including the 'blue corridor' of the river valley) and ensuring that any development permitted within them under other policies of this plan would not compromise the corridor function.

- 9.10.5 The Council's Open Space Study 2009<sup>7</sup> (as updated in 2017) describes green corridors as linear features mostly open in character e.g. footpaths, riverside paths and bridleways, which act as wildlife corridors and attractive, safe, off-road links between residential areas or open spaces or other destinations. Their value is increased if they link up to form a network and, for Ipswich, they may also link to the open countryside in neighbouring authority areas. They help to create urban environments that are attractive, clean and safe.
- 9.10.6 Ipswich benefits from an important and continuous green corridor in the form of the river path which follows the river from the Waterfront westwards through to Sproughton. Enhancing the river path is a key aim of the Ipswich River Strategy. The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document proposes pedestrian and cycle bridges across the river to link up communities and facilities north and south of the river in the vicinity of Elton park, and east of Stoke Bridge. In order to maintain an appropriate ecological buffer along the river, no development should take place within 10m of the river. Development taking place within this buffer zone will only be permitted if it can be clearly demonstrated that it would maintain or enhance the ecological quality of the river corridor.
- 9.10.7 On the periphery of the Borough there are other important areas of natural and semi-natural green space which provide corridor functions, for example Belstead Brook, Orwell County Park and Rushmere Heath.
- 9.10.8 The Haven Gateway Green Infrastructure Strategy<sup>8</sup> recognised their value but also identified gaps, particularly to the north and east of Ipswich. Thus the Core Strategy, through policy CS16, seeks to link radial green corridors with a publicly accessible 'green trail' around Ipswich. The Council will take opportunities through development, such as at the Ipswich Garden Suburb, which is addressed through policy CS10, to provide links in the green trail where currently there are gaps. Where the green trail traverses development sites, the Council will work with developers and other stakeholders to agree a route.
- 9.10.9 Green corridors can provide safe and pleasant cycling and walking routes that offer an alternative means of accessing parts of the town. This benefits air quality in general and the health of cyclists and walkers in particular.
- 9.10.10 Some of the green trail will fall outside the Borough where the boundary is very tightly drawn. Where this is the case, the Council will work with neighbouring local authorities to address the provision of green infrastructure later in the plan period. This will seek to address gaps and provide links into the strategic walking and cycling route network, for example:
- eastwards to the coast via the Sandlings Walk
  - south-eastwards via the Stour and Orwell Walk
  - southwards via Belstead Brook Park to Alton Water
  - northwards via the Fonnereau Way to the Fynn Valley
- 9.10.11 The Council will work to develop a more detailed map of the green corridors based on recreational open spaces and existing rights of way and permissive routes. Plan 6 illustrates the broad location of the corridors.

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<sup>7</sup> *Open Space, Sport and Recreation Facilities Study 2009, PMP (updated 2017)*

<sup>8</sup> *Haven Gateway Green Infrastructure Strategy, April 2008 The Landscape Partnership*

## **POLICY DM11: Countryside**

**Within the countryside defined on the policies map, development will only be permitted if it:**

- a. respects the character of the countryside; and**
- b. maintains separation between Ipswich and surrounding settlements; and**
- c. does not result in isolated dwellings; and**
- d. contributes to the green trail and other strategic walking and cycling routes and wildlife corridors where appropriate.**

**Major development in the countryside will only be permitted if it satisfies a. to d. above and:**

- a. is necessary to support a sustainable rural business including tourism; or**
- b. is a recreational use of land which retains its open character; or**
- c. is major residential development.**

**In the case of the AONB, major development, as defined by NPPF footnote 55, will only be permitted in exceptional circumstances in accordance with NPPF paragraph 172. The natural beauty landscape and special qualities of the AONB should be conserved and enhanced.**

- 9.11.1 Ipswich is set within a high quality landscape at the convergence of three distinctive landscape character areas defined by Natural England: the South Norfolk and High Suffolk Claylands, the South Suffolk and North Essex Claylands and the Suffolk Coast and Heaths, part of which is designated as an Area of Outstanding Natural Beauty. Suffolk County Council has also developed a finer grain landscape character assessment. The Borough boundary includes small amounts of countryside to the north-west, north-east and south-east of the urban area.
- 9.11.2 The National Planning Policy Framework (NPPF) recognises the intrinsic character and beauty of the countryside. Together with peripheral designated open spaces, the countryside around the Ipswich urban area, including in neighbouring districts, provides an attractive setting for the town and links into its ecological and green corridor networks. The NPPF requires planning to take account of the different roles and character of different areas and, therefore, it is appropriate to maintain separation between Ipswich and surrounding settlements.
- 9.11.3 Ipswich also contains a small area of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) on the southern boundary of the Borough. The NPPF sets out the approach to considering major development applications within the AONB in paragraph 172. The definition of major development in respect of development within the AONB is defined by footnote 55 of the NPPF and is matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.
- 9.11.4 The NPPF supports rural tourism and leisure developments which respect the character of the countryside. However, isolated development in the countryside should be avoided unless justified under paragraph 79 of the NPPF
- 9.11.5 Subject to infrastructure and highways constraints, there are some areas of countryside within the Borough boundary which have been assessed as having 'in principle' acceptability for housing through the Strategic Housing Land Availability Assessment. In the event that the infrastructure constraints can be addressed satisfactorily, any development would be required to meet the criteria in the policy.

- 9.11.6 Ipswich has a tightly drawn Borough boundary so countryside at the periphery of the Borough is not physically remote from the urban area. However development which would be relatively isolated in terms of access to public transport and community facilities should be avoided.
- 9.11.7 Impact on the character of the Ipswich countryside will be assessed in relation to the Suffolk County Council character assessment analysis. Areas of countryside are defined on the policies map.

## **POLICY DM12: Design and Character**

The Council will require all new development to be well-designed and sustainable. In the plan area this will mean layouts and designs that provide a safe, and attractive public realm capable of being used by all. They will:

- a. Form areas which function well by integrating residential, working and community environments and which fit well with adjoining areas;
- b. create safe and secure communities by complying with the relevant secure by design guidance where appropriate to do so;
- c. include useable public spaces for all (including pedestrians, cyclists and people with disabilities) that are easily understood and easy to pass through;
- d. introduce greener streets and spaces to contribute to local biodiversity net gain, visual amenity, and health and well-being, and offset the impacts of climate change;
- e. incorporate cycle and waste storage, public transport infrastructure and car parking (including electric vehicles) if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity and allows sufficient permeability for public transport, refuse collection and emergency vehicles;
- f. in residential development of 10 or more dwellings, 25% of new dwellings will be required to be built to Building Regulations standard M4(2). The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.

Proposals should also respect and promote the special character and local distinctiveness of Ipswich by:

- g. protecting and enhancing significant views that are considered to be important or worthy of protection, including those set out in the Ipswich Urban Character Studies, Conservation Area Appraisal and Management Plans, as well as the setting of any heritage assets. The design should help to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene;
- h. ensuring good public realm design that enhances the streetscape and protects and reinforces a sense of place, through the appropriate use of public art, bespoke paving, street furniture and soft landscaping; and
- i. ensuring good architectural design that responds to and reflects its setting, is sustainable, accessible and designed for long life by being capable of adaptation to changing needs and uses over time and demonstrate the principles of dementia-friendly design.

**Designs that do not adequately meet or address these criteria will be refused.**

9.12.1 National planning policy is clear that all new development should achieve high standards of design and environmental sustainability. Given high projected levels of growth in Ipswich over the plan

period and the distinctiveness and quality of the central area of town where much of this growth is to be directed, design quality is considered to be a particularly important requirement for all new development in the town.

- 9.12.2 In an era of rapid social, economic, environmental and technological change, buildings need to be designed to be adaptable to respond in a sustainable manner to the changing needs of occupiers. This is the 'long-life, loose-fit' principle. For commercial buildings, it could mean ensuring that a building designed as an office for one organisation is physically capable of being subdivided, should future patterns of demand change.
- 9.12.3 In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings. These optional standards can only be required through a planning policy requirement. The national Planning Practice Guidance states that 'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.'
- 9.12.4 The 2014 Suffolk Housing Survey indicates that 10% of Ipswich residents live in a home which has been adapted in some way for accessibility purposes. The results indicate that a further 3% of Ipswich residents currently require adaptations to their dwellings. Since 2007 almost 1,600 adaptations have been carried out on the Council's housing stock. The number and proportion of elderly residents in the Borough is predicted to increase over future years, potentially further increasing the need for dwellings to be accessible and adaptable. Therefore, 25% of dwellings on sites of 10 dwellings or more should be M4(2) compliant. Should the evidence show this requirement to be, in practice, readily viable, the policy will be revised accordingly as part of the envisaged future review of plans. However, the Council's housing register currently indicates that a relatively small number of wheelchair accessible homes built to Building Regulations Standard M4(3) are needed and, therefore, whilst this type of provision is encouraged within affordable housing developments, it is not a requirement.
- 9.12.5 Development should seek to adopt the principles of dementia-friendly design:
- Familiar environments – functions of places and buildings are obvious, any changes are small scale and incremental;
  - Legible environment – a hierarchy of street types, which are short and fairly narrow.
  - Clear signs at decision points;
  - Distinctive environment – A variety of landmarks, with architectural features in a variety of styles and materials. There is a variety of practical features (e.g. trees and street furniture); and
  - Accessible environment – Land uses are mixed with shops and services within a 5-10 minute walk from housing. Entrances to places are obvious and easy to use and conform to disabled access regulations.
- 9.12.6 The public realm is defined as the parts of a town that are available without charge for everyone to experience and enjoy. It includes both formal and informal spaces such as streets, squares, parks and open spaces, the urban fringe and footpaths linking to nearby countryside. An attractive and well-functioning public realm that is friendly to all users is key to creating the sort of environment that people want to be in. It is also important in prioritising the needs of pedestrians and cyclists over those of the car in terms of safety and air quality for a healthier lifestyle. Specific proposals for new and improved areas of public realm in central Ipswich are identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.
- 9.12.7 Integrating land uses into mixed use developments and neighbourhoods improves the overall sustainability of Ipswich and also reinforces community cohesion. It helps to create local vitality and reduce the need to travel. In areas such as the Waterfront, Ipswich has seen the benefit of a mixed use approach that combines living, leisure and culture, and working.

- 9.12.8 Developments must be sustainable and adhere to the relevant Secured By Design guide where appropriate to do so. Proposals for large developments must be subject to consultation with the local Design Out Crime Officer at Suffolk Constabulary. This applies to all development types, whether residential, commercial or public sector. These guides will require particular consideration to be given to the layout of the development to increase natural surveillance, the use of appropriate boundary treatments and access control systems to deter unauthorised access, appropriate planting, the appropriate use and location of open space and taking every opportunity to minimise the potential for Anti-Social Behaviour (ASB).
- 9.12.9 Greening the streets of Ipswich has visual, functional, social, economic and environmental benefits. In terms of climate change, street and car park trees help by providing shade from the sun, slowing surface water run-off, and combating the urban heat island effect. Trees also contribute to health, welfare and quality of life of everyone who lives and works in the urban environment along with being an additional habitat for wildlife. Where underground services and hard surfacing are a potential issue, the use of root barriers and below ground engineered tree pits to provide viable soil volumes, and Tree Root Protection Systems will be explored. The appearance of streets will also be improved through a Tree Planting Design Guide and limiting the amount of 'street clutter', including unnecessary signage, bollards, railings, road markings and street furniture.
- 9.12.10 The wooded skyline that provides the backdrop to much of central Ipswich is a key part of the centre's character and setting and will be protected and sustainably enhanced. The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document and the Ipswich Urban Character Study supplementary planning document identify key viewpoints and key strategic views in relation to the wooded skyline around central Ipswich. Relevant policy guidance in respect of tall buildings can be found in policy DM15.
- 9.12.11 The character and distinctiveness of Ipswich is the product of a combination of Ipswich's geographical setting, history and communities. The character of different areas of Ipswich is analysed through the conservation area character appraisals (covering the conservation areas only) and the Ipswich Urban Character supplementary planning document. Decisions about proposed development which would harm the significance of a designated heritage asset will be taken having regard to the NPPF and DM13 Built Heritage and Conservation and DM14 Archaeology.
- 9.12.12 In order to support Ipswich residents in adopting sustainable and healthy lifestyles, the Council will ensure that new developments offer opportunities to be naturally active and promote physical activity, walking and cycling in accordance with Sport England's Active Design guidance.
- 9.12.13 Criterion f. of the policy seeks to secure well-designed, adaptable and resilient places in accordance with the Planning Practice Guidance paragraphs 015 and 019 (Reference ID: 26-019-20140306). Assessment of design quality for major applications for residential development will be made using the Building for Life 12 criteria (CABE at the Design Council / Design for Homes / HBF) and applicants will be expected to demonstrate that scheme designs can achieve a 'green' score in each category enabling schemes to be eligible for 'Building for Life Diamond' status. However it is recognised that not every development proposal will meet this criteria and in these circumstances developers will be expected to justify why this is not possible. The Building for Life criteria are reflected in policy DM12 and therefore addressing the specific requirements of Building for Life will contribute towards meeting the requirements of policy DM12. The criteria in policy DM12 also contribute towards the creation of safe, functional and well-designed communities as aspired to by the Government's Lifetime Neighbourhoods ambitions.
- 9.12.14 The design quality of smaller residential developments will be assessed against the various Building for Life criteria as may be considered reasonably applicable to the type and scale of development under consideration. The Council's Space and Design Guidelines SPD, which address matters such as spacing between dwellings, will apply to all residential developments.

- 9.12.15 The design of all major non-residential or mixed-use developments will be assessed against the design criteria set out in By Design: DETR 2000.
- 9.12.16 Applicants for planning permission will be required to clearly demonstrate how the submitted development proposal achieves urban design quality through the design and access statement accompanying their application, where required by the Council's Local Validation List.
- 9.12.17 It will be necessary to ensure that the siting, layout, scale, form, massing, materials and detailing of any proposed buildings will have a positive visual relationship with surrounding buildings. Matters of silhouette, proportion, and solid to void ratios and anti-reflective glass, will all be important considerations to be addressed
- 9.12.18 It is important that the design of development creates buildings that work well for their occupiers. This includes the provision of adequate storage in new developments, be that for wheelie bins, cycles, or for the storage of mobility scooters. Provision for waste storage should support the aim to increase recycling. It may also mean designing for an ageing population to reflect demographic trends. In order to promote sustainable use of materials encouragement will be given to the reuse of previously used materials in construction.
- 9.12.19 Urban greening is important, to enhance the townscape, tackle and help adapt for climate change and enhance biodiversity. It could include the incorporation of canopy cover, green walls and green roofs and the creation of urban greenspace, as part of soft landscaping considerations. Opportunities for greening should be maximised in all developments, where appropriate. Provision to support biodiversity net gain should include measures such as nestboxes for birds (swifts, house sparrows, starlings) and bat boxes integrated into the fabric of the building. The Council will also refer to its Open Space and Biodiversity Policy.
- 9.12.20 Public art can play a critical part in the development and regeneration of places by making the architecture and/or the setting or public space around them more attractive, and establishing a sense of place and local identity. It also has intrinsic cultural and aesthetic value.
- 9.12.21 The placing of public artworks on development sites is a material consideration in the planning system. The Council encourages all major developments to integrate public art installations or bespoke features as part of the overall design concept from the outset. Applications should incorporate information on the content and quality of any public art into the accompanying Design and Access Statement.

## **POLICY DM13: Built Heritage and Conservation**

Proposals for new development must consider the impacts on the historic built environment which makes Ipswich such a distinctive town, seek opportunities for enhancement of the town's heritage, and respond to the historic pattern of development and character of the area and comply with the requirements of the NPPF.

### **Listed Buildings**

To preserve and enhance the Borough's 600+ listed buildings, the Council will:

- a) support proposals for alterations and extensions to listed buildings where there would be no harm to the special architectural and historic interest of the building. This will consider the design, scale, materials and appearance with regard to the significance of the listed building;
- b) support proposals for the change of use of a listed building where the use will retain elements of the building which contribute to the building's significance, including internal features, historic fabric, plan form, appearance and layout;
- c) support development within the setting of listed buildings that would not cause harm to the significance of the building through the introduction of sympathetic development in the building's setting, retaining a curtilage appropriate to the listed building; and
- d) only in exceptional circumstances grant listed building consent for the total or substantial demolition of a listed building;

### **Conservation Areas**

The adopted Conservation Area Appraisals and Management Plans for the Borough's 15 Conservation Areas will be used to inform the Council's decisions when assessing the impact of proposals.

The Council will:

- require development within conservation areas to protect and enhance the special interest, character and appearance of the area and its setting;
- require the position, mass, layout, appearance and materials of proposed development, and the design of the space and landscaping around it, to pay regard to the character of adjoining buildings and the area as a whole.
- ensure that proposed changes of use within or adjacent to conservation areas would not detract from the special interest, character and appearance of the designated area, which should include sympathetic alterations and additions to facades that are visible from the public domain and the retention of any existing features of special architectural merit.

- preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which contribute to the significance of the area by being located in the setting of the conservation area.
- only in exceptional circumstances grant permission for the total or substantial demolition of an unlisted building that makes a positive contribution to the special interest and significance of a conservation area; and
- Consider the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area.

#### **Non-designated heritage assets**

The Council will also protect non-designated heritage assets. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss against the significance of the heritage asset.

Adopted Conservation Area Appraisals and Management Plans; the Development and Archaeology SPD (2019); Ipswich Urban Character SPD (to identify the special character and distinctiveness of Ipswich in relation to the proposal); the Local List (Buildings of Townscape Interest) SPD; Space and Design Guidelines SPD; the Shop Front Design Guide; and the Public Realm SPD as appropriate, will be used to inform the Council's planning decisions to proposals subject to this policy.

Where a proposal involves directly, is adjacent to or affects the setting of a heritage asset, the developer must submit a heritage statement proportional to the heritage asset status.

Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated assets.

The Council will also protect non-designated heritage assets included on the 'Local List'.

The Council shall have regard to the effect of cumulative harm to heritage assets, refusing applications where previous development has been found to be harmful to the historic environment.

**Planning applications involving archaeology will also be subject to DM14.**

9.13.1 The Borough of Ipswich benefits from a rich history, with the settlement of the town developing from the Saxon period. Like much of the East Anglian region, Ipswich benefitted from the prosperity of the wool and cloth trade throughout the medieval period, whilst its location opposite the mouth of the Rhine allowed the town to establish itself as an important trading port. The wealth of this period is evident in the historic core of the town, with fine timber framed buildings contributing to much of the town centre's building stock. The economic downturn following the decline of the wool trade preserved many of these medieval buildings, as in contrast to other parts of the country in the Georgian era, many building owners in Ipswich were not prosperous enough to rebuild their homes to the latest

fashion. The growth of industry and population in the Victorian period led to the redevelopment and expansion of the town providing distinctive suburbs of 19th century development, which are an important part of the town's character.

- 9.13.2 The rich history of Ipswich is recognised by the volume of heritage assets across the town. The borough benefits from over 600 listed buildings, 15 Conservation Areas, 8 Scheduled Ancient Monuments, 3 Registered Parks and Gardens, an area of archaeological importance, and hundreds of undesignated heritage assets.

### **Listed buildings**

- 9.13.3 The Borough benefits from a high volume of listed buildings, which contribute to the character of the town, illustrate the town's history, encourage visitors and tourism, as well as make the town a distinctive place to live and work.
- 9.13.4 Buildings listed for their special architectural or historic interest have statutory protection under the Planning (Listed Buildings and Conservation Areas) Act 1990. The Council has a statutory duty to preserve and enhance the character and appearance of listed buildings in Ipswich and will therefore only grant planning permission and listed building consent for works and changes of use which complement this obligation.
- 9.13.5 Consent will not be granted for the demolition of a listed building other than in exceptional circumstances, and not unless the Council is satisfied that every possible effort has been made to continue the present use, or find a suitable new use. Demolition will not be permitted until there are approved detailed plans for redevelopment that would immediately follow the clearance of the site.
- 9.13.6 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building.

### **Conservation Areas**

- 9.13.7 There are fifteen designated conservation areas in Ipswich, which protect distinctive areas of the town's built heritage, including the medieval core, the Victorian wet dock, the historic hamlets of Stoke and Whitton, and numerous 19th century suburbs.
- 9.13.8 The Council will protect and enhance the character and special interest of the town's conservation areas. Conservation Area Appraisals and Management Plans have been prepared which provide further guidance on the character of these areas. The Council will take these documents into account as material considerations when we assess applications for planning permission which have the potential to affect these areas.
- 9.13.9 Due to the urban nature of Ipswich, the character and appearance of a conservation area can be affected by development outside of the conservation area boundary. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area, and will consider the impact of cumulative harm in this regard.

9.13.10 The character of conservation areas derives from the combination of a number of factors including building patterns, land form, historical development and key views. These elements should be identified and responded to in the design of new development. Design and Access Statements should include an assessment of local context and character and set out how the development will respond to the existing urban grain of development.

#### **Demolition in a conservation area**

9.13.11 The Council has a general presumption in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area, whether they are listed or not, so as to preserve the character and appearance of the area. The Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention. Applicants will be required to justify the demolition of a building that makes a positive contribution to a conservation area, having regard to the National Planning Policy Framework, Ipswich's Conservation Area Appraisals and management strategies and any other relevant supplementary guidance produced by the Council.

9.13.12 When considering applications for demolition, the Council will take account of group value, context and the setting of buildings, as well as their quality as individual structures and any contribution to the setting of listed buildings. Applications must clearly show which buildings or parts of buildings are to be demolished.

#### **Use**

9.13.13 Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment.

#### **Details**

9.13.14 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration.

#### **Landscape**

9.13.15 The value of existing gardens, trees and landscape can make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

#### **Setting of heritage assets**

9.13.16 The setting of a heritage asset, although not forming part of any statutory designation, can contribute to the significance of the heritage asset. The value of a heritage asset can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. While the setting of a heritage asset may be limited to its immediate surroundings, it can often extend some distance from it, and is defined by the NPPF as the surroundings in which a heritage asset is experienced. Views of/to a heritage asset may contribute to the setting of a heritage asset, but setting can also be influenced by other environmental factors, and does not depend on visual links and intervisibility alone, nor does it depend on there being public rights of access to the experience of the setting of the heritage asset.

9.13.17 Historic England have produced *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* which applicants are encouraged to read where their proposals will be in the setting of heritage assets.

### **Vacant Heritage Assets**

9.13.18 Ipswich has a number of prominent vacant buildings of heritage value. The Council will support proposals that bring these premises back into use, particularly where they form part of a wider proposal for regeneration. This will help to meet the objectives of policy CS4 Protecting our Assets.

### **Sustainable design and retrofitting**

9.13.19 Historic buildings, including those in conservation areas, can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival.

9.13.20 In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed against the degree to which proposals will affect the significance and special interest of the building/area.

9.13.21 Historic England publishes advice on the application of Part L of the Building Regulations to historic and traditionally constructed buildings.

### **Registered Parks and Gardens**

9.13.22 In addition to conservation areas, listed buildings and archaeological remains, Ipswich benefits from three registered parks and gardens (Chantry, Cemetery and Christchurch), as designated by Historic England. The Council will encourage the management of registered parks and gardens and where appropriate, enhance their value and protect their setting. The Council will consult with Historic England over proposals affecting these parks and gardens.

### **Non-designated heritage assets**

9.13.23 The Borough also has many attractive, historic, locally significant buildings and features which contribute to the distinctiveness of local areas, but which are not formally designated. Non-

designated heritage assets may either be identified as part of the planning process or included on the adopted Local List (Buildings of Townscape Interest) SPD. When planning permission is required for any proposal that directly or indirectly affects the significance of a non-designated heritage asset (either on the Local List or not) then the Council will treat the significance of that asset as a material consideration when determining the application.

### **Requirements for Heritage Statements**

- 9.13.24 A Heritage Assessment is an assessment of the significance of heritage assets and/or their settings affected by a development and of the impacts of that development upon them. Quite apart from the need to comply with the NPPF, the Heritage Statement is an important practical tool to guide an applicant in developing their proposals. As good practice, it should therefore be one of the first things that an applicant considers when beginning to formulate their development proposals. In other words, the needs and constraints of the identified heritage asset(s) should influence the evolution of the proposal from the outset and a Heritage Statement should explain how an applicant /agent has arrived at a certain proposal. Good understanding of heritage asset(s) is essential before that process can take place.
- 9.13.25 There is no prescribed format for a Heritage Statement and it does not have to be a freestanding document. Sometimes a Heritage Statement will be amalgamated with other documents such as a schedule of works, a design and access statement, or drawn details that may expand on the content of submitted drawings. It is for the applicant or agent to decide whether it is appropriate, in the circumstances, to amalgamate the documents or keep them separate. So long as the content of the document is made clear in the title, it makes no difference to the validation of an application by the Authority.
- 9.13.26 A Heritage Statement needs to be relevant and appropriate, but also proportionate, depending on the scale and nature of the proposal and the heritage asset(s) affected. Small works, of small impact, require only simple heritage statements that can easily be produced without the need for special expertise. Appendix 8 includes guidance on what is required in a Heritage Statement submitted to the Council. Essentially, it needs to identify and describe the heritage assets affected; assess the impact of the proposed development on the heritage asset and mitigate the impact.

## **POLICY DM14: Archaeology**

**The Borough will require that development proposals which may disturb remains below ground are supported by an appropriate assessment of the archaeological significance of the site including, if necessary, the results of a programme of archaeological field investigation. Such assessments should be proportionate to the importance of the site. Sites within the Area of Archaeological Importance are especially likely to contain significant archaeological remains. The Development and Archaeology Supplementary Planning Document provides guidance on the preparation of archaeological assessments.**

**Planning permission will not be granted if the remains identified are of sufficient significance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used. Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.**

**Where archaeological potential is identified but where the public benefits of the proposal convincingly outweigh harm to the significance of archaeological heritage assets, development which would destroy or disturb potential remains will be permitted, subject to an appropriate programme of archaeological investigation, recording, reporting, archiving, publication, enhanced public understanding and community involvement.**

- 9.14.1 Historic towns and cities are highly sensitive archaeological sites, where buried features, finds and standing monuments form a unique and irreplaceable record of a settlement's unwritten history.
- 9.14.2 As a historic port, aspects of the archaeological record in Ipswich are nationally important. However, Ipswich is particularly special in that it has origins as one of only four international ports in the Middle Saxon period. As a major Anglo-Saxon centre engaged in long-distance trade, it has an internationally important archaeological record from this time. The town's early fortunes were linked to the developing Anglo-Saxon kingdom of East Anglia, and Ipswich was likely a trading settlement founded by the Royal house, notably associated with the burial ground at Sutton Hoo. Remains at several locations in Ipswich are statutorily protected through designation as scheduled monuments. There are currently eight scheduled monuments in Ipswich.
- 9.14.3 To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damaged, the planning process must ensure that development proposals respect archaeologically important sites
- 9.14.4 The NPPF sets out specific requirements for assets with archaeological interest. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, developers will be required to submit an appropriate desk based assessment and, where necessary, a field evaluation (which could include geophysical survey,

building survey and trenched evaluation) at an appropriate stage prior to determination of an application.

- 9.14.5 Suffolk County Council Archaeology Service holds the Urban Archaeological Database for Ipswich and is consulted on planning applications that could affect archaeology. Historic England administers the Scheduled Monument Consent process and should be consulted on any proposed works. Early consultation with relevant agencies is encouraged well in advance of seeking relevant permissions and consents, in order that appropriate consideration is given to heritage assets. This makes the application process simpler and reduces the risk for proposed schemes. Understanding the significance of affected assets is important to the process. The ability to document an asset is not a factor in determining a planning application. However, where permission is granted subject to conditions relating to archaeological remains, an appropriate programme of work to record and promote understanding of remains which would be affected by development could include some or all of the following: further evaluation, upfront excavation, and/or monitoring and control of contractor's groundworks, with appropriate curation and publication of results. The Development and Archaeology Supplementary Planning Document (SPD) is intended to help applicants make successful applications and provides further detail on procedures and best practice.
- 9.14.6 Attention is drawn to the policies maps, which show the Area of Archaeological Importance of the Anglo-Saxon and Medieval town, aspects of which are internationally recognised. Beyond this area, the Borough includes parts of the wider landscape of the Gipping Valley and Orwell Estuary, and there are Prehistoric, Roman, Anglo-Saxon and other period archaeological sites within its boundaries. For information, the Area of Archaeological Importance is also shown on Plan 4. The Area of Archaeological Importance is defined from evidence of buried archaeology, historic maps and information, standing structures and visual elements of the historic landscape and it highlights the area known or likely to have the most complex and sensitive archaeological deposits. This helps to alert applicants and planning officers to the likely requirements for archaeological investigation, protection and recording to be placed on development, on potentially even the smallest scale below-ground works. The Development and Archaeology SPD adds another layer of detail to the Area of Archaeological Importance by providing Archaeological Character Zones, more detailed geographical characterisation of 'archaeological potential'.

## **POLICY DM15: Tall Buildings**

**Planning permission for tall buildings will be granted within the arc of land to the south-west of the town centre in the vicinity of Civic Drive and the Northern Quays of the Waterfront, as shown on the IP-One Area Inset Policies Map, providing that the design of any proposed building satisfactorily addresses all of the following criteria:**

- a. Respects local character and context, including heritage assets;**
- b. achieving a building that is of the highest architectural quality;**
- c. is sustainable in design and construction and ensures the public safety, including fire safety, of all building users;**
- d. the design is credible in technical and financial terms;**
- e. makes a positive contribution to public space and facilities;**
- f. does not negatively impact on the local microclimate;**
- g. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;**
- h. provides a well planned external and internal environment;**
- i. preserves strategic and local views, with particular reference to conservation areas listed buildings and other heritage assets, and the wooded skyline visible from and towards central Ipswich; and**
- j. is carefully designed to avoid refraction of light off external glass surfaces.**

**In other locations within the Borough proposals for tall buildings may exceptionally be considered to be appropriate if it can be demonstrated satisfactorily that they satisfy criteria a. to j. of the policy and would not harm the character and appearance of the area.**

- 9.15.1 The boundaries of the arc of land to which this policy applies are illustrated on the IP-One Area Inset Policies Map.
- 9.15.2 Tall buildings may be defined as 'buildings which are substantially taller than their neighbours or which significantly change the skyline'. The definition is taken from 'Guidance on Tall Buildings' EH /CABE 2007. Proposals should consider and comply with the Historic England Tall Buildings Advice Note (4) 2015 as appropriate.
- 9.15.3 Tall buildings can only be considered appropriate in certain limited locations in Ipswich and various special considerations, over and above standard urban design considerations, should apply to their planning and design, particularly in listed building and conservation area terms. Decisions about proposed development which would harm the significance of a designated heritage asset will be taken having regard to the NPPF.

- 9.15.4 Detailed guidance and planning submission requirements for proposed schemes are set out in detail in the above mentioned document and will be used by the Council in the assessment of any such proposals.
- 9.15.5 Central Ipswich is circled by a wooded skyline, which is particularly important to the setting of the central area including Ipswich Village and the Waterfront. Developments will only be permitted where they do not seriously disrupt this setting, especially when viewed from key viewpoints. Strategic views in and across central Ipswich have been identified through the Ipswich Urban Character Study supplementary planning document and in Conservation Area Statements and Management Plans.
- 9.15.6 The NPPF states that planning policies should promote public safety by ensuring appropriate and proportionate steps are taken to reduce vulnerability, increase resilience and ensure public safety and security. Although the subject of fire safety is covered by part B of the Building Regulations, it is important that proposals for tall buildings achieve the highest standards of fire safety, reducing risk to life, providing acceptable means of escape and ensuring that risk to life is as low as possible. To achieve this, applicants should consider whether the building materials (e.g. cladding) is suitable from the outset and that built-in emergency responses to fire, such as sprinkler systems, are accounted for.
- 9.15.7 The impact of any proposed tall building on listed buildings will be assessed under the provisions of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

**POLICY DM16:  
Extensions to Dwellings  
and the Provision of Ancillary Buildings**

**Alterations or extensions to existing dwellings and ancillary development within the curtilage of dwellings will be permitted provided that the proposal:**

- a. respects the character, scale and design of the existing dwelling;**
- b. respects and preserves the historic pattern and established townscape of the surrounding area and does not lead to the creation of a terracing effect where there are not already terraces;**
- c. would not result in over-development of the dwelling's curtilage; and**
- d. would not adversely affect residential amenity in terms of privacy/ overlooking, outlook, access to daylight and sunlight, noise and disturbance, light spillage and safety and security.**

**In addition to the above criteria, the development of residential annexes will be permitted where it meets all the following criteria:**

- e. it is subordinate in scale to the main dwelling;**
- f. it is functionally linked to the main dwelling and does not physically divide the residential curtilage;**
- g. it could not be accessed separately from the main dwelling or its curtilage unless required by Building Regulations; and**
- h. it would have shared vehicular access and garden;**

9.16.1 Extensions should be subordinate to the original building in terms of scale and situation. A harmonious contrast with the existing property and surroundings may be appropriate for some new work to distinguish it from the existing building; in other cases, closely matching materials and design details are more appropriate so as to ensure the new work blends with the old.

9.16.2 Extensions to the side of houses are particularly visible. In these cases, it is important to reflect the character of the street and ensure that an extension is not visually dominant in a way that detracts from its surroundings. Extensions should be set back from the building line by four metres. They should also ensure that, where gaps between dwellings are a key part of the character of the street, they are retained.

9.16.3 In many streets in the borough houses have mature rear gardens that can often be seen through gaps between buildings, softening the urban scene and providing visual interest. Care should be taken to ensure that two storey and first floor side extensions to semi-detached or detached houses do not reduce the width or close the gaps between houses and create a 'terracing effect'. Such extensions would normally have to be set back behind the main front wall of the house by 4 metres. However, where schemes include recesses, these must be designed to avoid providing the opportunity for anti-social behaviour or crime. Further information on designing safer environments is set out in Secured by Design Homes 2019. Such development

should also maintain external access to rear gardens. The Space and Design Guidelines supplementary planning document adopted in November 2015 provides more guidance.

- 9.16.4 The construction of structures in rear gardens and other undeveloped areas can often have a significant impact upon the amenity, biodiversity and character of an area. They may detract from the generally soft and green nature of gardens and other open space, contributing to the loss of amenity for existing and future residents of the property. As such an extension or self-contained annex should not result in the loss of more than 50% of the useable private garden area.
- 9.16.5 The Council has seen a rise in residential annexes in recent years. Development which assists households to adapt to changing circumstances should be supported so long as it forms a physical link to an existing dwellinghouse and retains a functional relationship involving some shared facilities. To qualify as an annex the accommodation should have a degree of dependency on the main dwelling house to ensure a single planning unit is retained and a separate residential dwelling is not created. When the use has ceased the annex should continue to be used ancillary to the main dwellinghouse and not separately used, occupied or let.

**POLICY DM17:  
Small Scale Infill and Backland  
Residential Developments**

**Proposals for small scale residential development involving infill, backland or severance plots will not be permitted unless the development:**

- a. is sited in a location where it would not be disturbed by or disturb other land uses;**
- b. protects the setting of existing buildings and the character and appearance of the area;**
- c. allows the retention of a reasonable sized garden, in accordance with the provision set out in policy DM7;**
- d. does not cause unacceptable loss of amenity to neighbouring residents having regard to noise and vibration, sunlight, daylight, outlook, overshadowing, light pollution/ spillage, privacy/ overlooking and sense of enclosure;**
- e. provides a suitable level of amenity for future occupiers;**
- f. has safe and convenient access;**
- g. meets the Council's parking standards and would not lead to an unacceptable loss of parking serving existing dwellings; and**
- h. has secure and lit bicycle storage and external storage for recycling, organic waste and non-recyclable waste.**

9.17.1 The tight Borough boundary around Ipswich means that small sites, such as backland plots behind existing dwellings, have historically been an important source of additional dwellings for the town. However, given the nature of such sites often close to existing housing, new development needs to be carefully controlled in order to protect the character and amenity of the neighbourhood and the quality of life of its existing and future inhabitants.

9.17.2 The potential exists for quality design approached which contrast positively with the surrounding architectural character, and this will be encouraged where there is no conflict in terms of scale, density, vehicle use or other considerations.

9.17.3 In the case of severance plots, it is important that the original dwelling(s) shall retain sufficient garden space to meet the Council's minimum standards. The Council's Space and Design Guidelines supplementary planning document will also apply.

## **POLICY DM18: Amenity**

The policy aims to ensure that existing and additional residential properties provide an attractive living environment for current and future occupiers.

**The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not result in an unacceptable loss of amenity. Exceptions will only be made where satisfactory mitigation measures can be secured. The factors we will consider include:**

- **visual privacy and overlooking**
- **overbearing impact and sense of enclosure**
- **sunlight, daylight, overshadowing and artificial light levels**
- **noise and vibration levels**
- **odour, fumes, dust and ventilation**
- **contamination**

**New development that would adversely affect the continued operation of established uses will not be permitted.**

### **Visual Privacy and overlooking**

9.18.1 Interior and exterior spaces that are overlooked lack privacy, which can affect the quality of life of occupants. The Council will therefore expect development to be designed to protect the privacy of the occupants of both new and existing dwellings to a reasonable degree. New buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking. The extent of overlooking will be assessed on a case-by-case basis. The places most sensitive to overlooking are typically habitable rooms and gardens at the rear of residential buildings. Habitable rooms are considered to be residential living spaces including dining and sitting rooms, bedrooms and kitchens. The area of garden nearest to the window of a habitable room is most sensitive to overlooking.

### **Sunlight, daylight, overshadowing and artificial light levels**

9.18.2 Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable spaces, the council will take into account the most recent guidance published by the building research establishment (currently the Building Research Establishment's Site Layout for Planning for Daylight and Sunlight – A Guide to Good Practice 2011).

9.18.3 Lighting creates a sense of safety and can enable activities in the evenings and at night. Lighting can increase the potential for natural surveillance and, where used correctly, can reduce the opportunity for criminal activity. However, poorly designed internal and external lighting or lighting that operates for an excessive period of time is a form of pollution that can harm the quality of life for those living nearby, affect wildlife and waste energy.

9.18.4 For example, lighting from conservatories can affect neighbours to the sides and rear, and the lighting of advertisements can affect people living nearby. Glare and light spillage from poorly designed lighting can make it less easy to see things at night and affect wildlife as well as people. Lighting should only illuminate the intended area and not affect or impact on its surroundings. Smart lighting systems and controls on the strength of light bulbs for external lights should be considered.

9.18.5 Schemes involving floodlighting and developments in sensitive areas, such as adjacent to sites of nature conservation importance, should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife.

### **Noise and vibration levels**

9.18.6 Where uses sensitive to noise are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application.

9.18.7 The planning process can assist by ensuring that as far as possible noise sensitive developments such as dwellings, schools, hospitals and nursing homes, are located away from existing sources of noise and that potentially noisy developments are located in areas where noise will not be such an important consideration.

9.18.8 Measures can be required to control exposure to noise through planning conditions. For example developers may be required to insulate buildings, erect screens or natural barriers or limit operating times.

### **Odour, fumes, dust and ventilation**

9.18.9 There are a number of factors which contribute to the quality of new development including ventilation. New buildings should have good ventilation and extraction systems to help expel pollutants, bacteria and moisture.

9.18.10 Odours, fumes and dust can be generated from commercial cooking, industrial processes, construction or demolition.

9.18.11 We will require all development likely to generate odour, fumes or dust to install appropriate extraction equipment and other mitigation measures.

### **Contaminated land**

9.18.12 Development on contaminated land can expose people to a wide range of potential health risks and can mobilise contaminants. Applicants who wish to develop suspected contaminated land will be required to undertake a thorough investigation of the site to determine any risk to human health and controlled waters (including groundwater). Relevant remediation and mitigation measures will need to be built into development proposals to ensure safe, sustainable development of the site.

## **POLICY DM19: The Subdivision of Family Dwellings**

**Development involving the conversion of houses into flats, bedsits or houses in multiple occupation will be permitted provided that the development:**

- a. would not result in the conversion of small or modest sized family houses containing 3 bedrooms or fewer or having a floorspace of less than 100 sq.m;**
- b. preserves and enhances the historic environment and heritage assets in accordance with Policy DM13 Built Heritage and Conservation;**
- c. would not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity;**
- d. provides sufficient car parking in accordance with the standards, secure and lit bicycle storage, amenity space and refuse, recycling and garden waste storage is provided for each unit;**
- e. incorporates a convenient and secure principal front door for each unit of accommodation and provides an appropriate standard of residential amenity.**

9.19.1 In order to maintain the variety of housing stock in the Ipswich to meet future needs, in particular the needs for family housing, Policy DM19 states that only existing dwellings with 4 or more bedrooms will be considered suitable for subdivision. It is also to ensure that the new units created provide an acceptable standard of accommodation in terms of internal arrangement and room sizes. Whilst the creation of self-contained flats and the subdivision of large properties can help to meet housing need, in some instances their provision can be detrimental to the amenity of existing residential areas.

9.19.2 Any future growth of the University of Suffolk and Suffolk New College and the likely increase in demand for flats, bedsits and houses in multiple occupation provide a further justification for a policy specific to Ipswich in order to ensure that conversions are appropriate. The Council requires applicants to consider the amenity of residents in adjacent dwellings, and within the building itself. The latter will be assisted through careful internal layout, which for example avoids positioning living rooms next to bedrooms in adjacent dwellings and within the building itself. The Council will also require all developments to incorporate appropriate secure by design principles to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment. Further information on designing safer environments is set out in Secured by Design Homes 2019'.

9.19.3 There are potential adverse effects from such conversions, particularly where there are concentrations. The significant loss of family housing can erode the character of an area through insensitive individual conversions and the cumulative impacts of physical changes to properties as a result of such use. Such streets are suffering from impacts such as significant car parking problems; clutter and untidiness; unsightly accumulation of satellite dishes; poor building maintenance; increased activity, noise and nuisance, etc. The quality of conversions, particularly where unregulated, can also be poor, with poor standards of accommodation and health and safety concerns.

- 9.19.4 Conversions, either individually or cumulatively, can also have a harmful impact on the character of the area through unduly diluting mixed and sustainable communities. In certain parts of the Borough, there are high concentrations of flat conversions and houses in multiple occupation, in part reflecting the very high student population which is especially prevalent around the University. Given that students are predominantly present during term time only, it can leave some roads and areas feeling quite dormant at other times, failing to achieve a mixed and sustainable community. In locations with already high numbers of flats or houses in multiple occupation, conversions to single family housing could help create a more mixed and sustainable community.
- 9.19.5 Where the proposal for sub-dividing family dwellings results in a house of multiple occupation, this will be subject to the requirements of policy DM20.

## POLICY DM20

### Houses in Multiple Occupation

**Proposals for the development of Houses in Multiple occupation (HMO), including through the change of use of existing non-residential buildings, will be supported where they:**

- a. Demonstrate that they meet the nationally required minimum room standards for HMOs;**
- b. Would not adversely affect the amenity of nearby residents in terms of noise and disturbance or loss of privacy;**
- c. Do not have an adverse impact on local employment uses – such as reducing the availability of office accommodation in strategically identified locations for office use;**
- d. Would not adversely impact on the amenity of the local area through the over-concentration of HMOs, or cumulatively adding to an area already subject to an over-concentration;**
- e. Provide an acceptable living environment for future occupants, including adequate outdoor amenity space, car parking (in accordance with the standards), secure and covered cycle parking and refuse storage; and**
- f. Are well-served by local services and accessible by sustainable transport modes**

**Proposals for HMO's will not be approved where they will result in an over-concentration of HMOs. An over-concentration is defined as:**

- More than two HMOs side by side;**
- The sandwiching of a single self-contained house or flat between two HMOs;**
- More than two HMOs within a run of twenty properties on one side of the road;**  
**or**
- More than one HMO in a road of fewer than twenty properties on one side of the road.**

9.19.1 According to the Housing Act 2004, a House in Multiple Occupation, or HMO, is a building, or part of a building, that is occupied by persons who do not form a single household - in other words, are not family members. For example:

- A house converted into three or more bedsits;
- A house converted into self-contained flats where fewer than two thirds of the flats are owner occupied and the flats were not converted in accordance with the 1991 Building Regulations;
- A house occupied by three friends who rent from a private landlord;
- A house let to a group of four students;
- A flat with three or more bedsits (even if the flats were converted in accordance with the 1991 Building Regulations and more than two thirds of the flats in the building are owner occupied); and
- A house occupied by a married couple and a friend.

9.19.2 Since April 2010, all landlords must apply for planning permission when converting a property into a House in Multiple Occupation (HMO). An application for planning permission will not be required where there are not more than six person living together as a single household.

- 9.19.3 For the purposes of 'living together as a single household' all amenities should be shared and individual rooms and spaces should be accessible to the general household, including bedrooms, bathrooms and kitchens including kitchen space i.e cupboards etc.
- 9.19.4 It is recognised that the provision of HMOs is needed to provide an affordable form of housing, particularly for young people, those on lower incomes and students, however, it is important that in approving an HMO, this does not have a significant negative impact on the residential amenity of neighbouring residents.
- 9.19.5 High concentrations of HMOs can have a detrimental effect on communities, through higher levels of general activity compared to what would normally be associated with a single dwelling house. This includes more intensive use of gardens for amenity purposes; noise and disturbance; additional waste and cycle storage; additional car parking in the vicinity of the building (either off-street or on-street); and more recently, the impact on neighbour amenity from building works associated with the conversions. Furthermore, additional occupancy levels can increase pressure on local services and potentially impact on social cohesion, given the likely higher turnover of occupants and generally more transient population associated with HMOs.
- 9.19.6 There continues to be a growth in the number of HMOs in Ipswich, with around 800 HMOs currently identified. HMOs need to be licenced when there are 5 or more people. Of these 800 HMOs in Ipswich, 78 are currently licenced.
- 9.19.7 From 1st October 2018, landlords of Houses in Multiple Occupation (HMOs) that have five or more people forming more than one household will need to have applied for a Mandatory HMO licence. Although licensing allows a degree of control to be exercised on the premises (e.g. fire standards), it does not cover the principle of such development or the manner in which the increased occupancy may affect the amenity of neighbouring properties.
- 9.19.8 The Council is in the process of implementing a Borough-wide Article 4 direction which removes the permitted development right for the change of use from C3 (dwellinghouse) to C4 (house in multiple occupation) for three to six unrelated persons. Therefore, once this comes under force, planning permission is required for all development and changes of use that create a HMO. This is not designed to prevent HMO's as a form of housing, rather to maintain an element of control so that high concentrations of HMO's do not arise negatively impacting on the residential amenities of surrounding residents.
- 9.19.9 Proposals will need to demonstrate that the building is large enough to accommodate the number of occupants proposed and provide an adequate living environment for its future occupants.
- 9.19.10 Applicants will be required to demonstrate that there will not be an over-concentration of HMOs in the local area. Exemptions to the above guidelines for defining over-concentration will only be considered where it can be adequately demonstrated that the change of use to a HMO will not harm the amenity of the local area.

## **POLICY DM21: Transport and Access in New Developments**

**To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:**

- a. not result in a severe impact on the highway network or unacceptable impacts on highway safety, either individually or cumulatively;**
- b. not result in a significant detrimental impact on air quality or an Air Quality Management Area and address the appropriate mitigation measures as required through policy DM3;**
- c. incorporate electric vehicle charging points, including rapid charging points in non-residential developments;**
- d. provide a car club scheme or pool cars, where this would be consistent with the scale and location of the development;**
- e. prioritise available options to enable and support travel on foot, by bicycle or public transport, consistent with local strategies for managing the impacts of growth on the transport network, and ensuring that any new routes are coherent and in accordance with the design principles of policy DM12 and local walking and cycling strategies and infrastructure plans;**
- f. have safe and convenient access to public transport within 400m, and facilitate its use through the provision or contributions towards services or infrastructure;**
- g. protect the public rights of way network and take appropriate opportunities to enhance facilities and routes;**
- h. ensure safe and suitable access for all users, including people with disabilities and reduced mobility;**
- i. allow for the efficient delivery of goods and access by service, refuse collection and emergency vehicles and bus permeability; and**
- j. mitigate any significant impacts on the transport network.**

**Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated. The Council will expect major development proposals to provide a travel plan to explain how sustainable patterns of travel to and from the site will be achieved. Development proposals will be accompanied by a satisfactory Transport Statement or Transport Assessment, which demonstrates that the cumulative impacts of the development after mitigation are not severe.**

9.21.1 The Council is keen to ensure that new developments have an acceptable impact on and relationship to existing transport infrastructure. Therefore the above will be important considerations in determining planning applications. The Council will need to be satisfied that impacts can be managed in a satisfactory way, sustainable modes have been prioritised and that suitable additional infrastructure provision is made where necessary.

9.21.2 Ipswich is a regional transport node and a compact town and therefore it should be possible to access the town centre and other parts of the town by sustainable means. In accordance with

the Ipswich Strategic Planning Area (ISPA) Transport Mitigation Strategy, the Council is keen to ensure that a modal shift away from the car can occur within the Borough. The main elements of the ISPA Transport Mitigation Strategy are listed in policy CS20. This policy should also be considered alongside the growth aims of the Local Plan Strategy, principally policy CS2.

- 9.21.3 The Council will need to be satisfied that the impacts can be managed in a satisfactory way and that suitable additional infrastructure provision is made where necessary. Where relevant, development should take opportunities for providing new infrastructure through well-designed cycle and pedestrian routes. It should also link with public transport facilities and services and seek to improve existing rights of way to reduce journey times to employment, schools and services and support active travel.
- 9.21.4 The Suffolk Rights of Way Improvement Plan is under review. The 'Suffolk Green Access Strategy' will replace 'In Step With Suffolk' and set out the aims, objectives and delivery plans for a further 10 years. This Council also expects development on sites which abut or relate closely to the town's rivers to provide for the improvement of public access alongside these. The Public Rights of Way network is more than just a means of reducing vehicular traffic. In addition to connecting areas and providing opportunities for physical recreation and social interaction, it provides vital access to services, facilities and the natural environment. In this sense it is a major recreational resource, economic asset and means of promoting mental and physical health. These benefits must be taken into account in the design of development along with the contributions it might make to sustainable routes and open space provision. Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made. This Council also expects development on sites which abut or relate closely to the town's rivers to provide for the improvement of public access alongside them.
- 9.21.5 Necessary mitigating measures to improve public transport infrastructure and services may be secured where this would reasonably relate to a development, whilst the introduction of car club schemes or pool cars in larger developments may also contribute to reducing levels of private car ownership in the town (the need for car club provision in new developments will generally be informed by the agreed findings of a Travel Plan). Criterion e. of the policy would not be applied unreasonably if limited parts of a development were unavoidably slightly further than 400m from public transport. The inclusion of electric vehicle charging points in residential plots, employment and retail developments and commercial car parks are also considered a sustainable measure that can help to reduce greenhouse gas emissions in line with the aims of the National Planning Policy Framework. The provision of charging points for electric vehicles within new developments should be made in accordance with the Suffolk Guidance for Parking (November 2015, amended May 2019).
- 9.21.6 The Council promotes the provision of car club spaces due to their proven ability to reduce car ownership and, in particular, second car ownership. Similarly, the Council will seek low emission vehicle infrastructure in the form of active electric vehicle (EV) charging points.
- 9.21.7 Additionally, new developments containing communal residential parking facilities, retail development and employment development should aim to deliver active charging capacity in accordance with the Suffolk Guidance for Parking. The proportion of rapid charging points will

be specified through the Low Emissions Supplementary Planning Document, taking into account viability considerations. In terms of car club spaces, 100 per cent of such spaces should have the passive capacity for eventual EV charging. Further details of the Council's EV and car club approach are to be outlined in the emerging Low Emissions Strategy Supplementary Planning Document.

- 9.21.8 In proposals for the development of 30 to 49 dwellings, 1,500 – 2,499 sq. m B1, 2,500 – 3,999 sq. m B2/B8, or 800 – 1,499 sq. m retail a transport statement will generally be required with a planning application. For development of or exceeding 50 dwellings, 2,500 sq m B1, 4,000 sq m B2/B8, or 1,500 sq m retail, a transport assessment will generally be required. Some smaller sites, in very sensitive locations, may require a transport assessment due to significant traffic impacts. Conversely, some larger sites may not give rise to significant impacts if they are in parts of the network that are not likely to be under pressure. A long term management strategy (Travel Plan) to increase sustainable patterns of travel to a site will also be secured in some instances. The degree of negative impact of a development will be determined by the Council in conjunction with the Highways Authority on a case by case basis, as this will also depend on the spatial context of the individual planning application under consideration.
- 9.21.9 Where a development is likely to have an impact on an Air Quality Management Area or other sensitive area, an assessment of the air quality impacts of the development will be needed with appropriate mitigation measures proposed as necessary. Policy DM3 sets out the requirements in relation to air quality. Confirmation on the level and extent of transport and highways reports that would be required to support development proposals can be found within the Council's Validation Checklist.

## **POLICY DM22: Car and Cycle Parking in New Development**

**The Council will require adopted standards of car and cycle parking to be complied with in all new development (except in the IP-One area), and will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities and create a safe and attractive environment. The Council will also require the provision of integral secure cycle parking in any new car parks in the town.**

**Car parking must be designed so as not to dominate the development or street scene or to result in the inefficient use of land.**

**There will be maximum standards of car parking provision with no minimum requirement for residential development within the IP-One Area, which has frequent and extensive public transport networks, and easy access to a wide range of employment, shopping, and other facilities.**

**A central car parking core will be defined in the town centre, through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. Within the central car parking core, only operational car parking will be permitted in connection with non-residential development, so that the stock of long-stay parking is not increased. New, non-residential long-stay car parks will not be permitted.**

**New development will provide high quality, secure cycle storage, and within non-residential developments of more than 1,000 sq. m or where more than 50 people will be employed, high quality shower facilities and lockers. These facilities should also be provided in minor non-residential developments unless it can be demonstrated that it is not feasible or viable. Cycle parking across the Borough is required to be secure, sheltered, conveniently located, adequately lit, step-free and accessible.**

- 9.22.1 Ipswich has a strategic objective to improve accessibility (CS5). This policy provides further requirements in terms of the quality and quantity of car and cycle parking provision. Standards for provision outside IP-One will be as set out in the Suffolk Guidance for Parking (2019) and any subsequent document.
- 9.22.2 Cycling is an increasingly important and sustainable means of travel. The Council will therefore expect cycle parking to be safe, convenient and secure and preferably subject to natural surveillance, so that users of a development are more likely to use bicycles to travel to and from a site. Where relevant, development should take opportunities for providing high quality cycle storage with workplace shower and locker facilities. Details regarding cycle parking standards and design can be found within the Suffolk Guidance for Parking (November 2015, updated May 2019).
- 9.22.3 The emphasis on provision for both residential and commercial development relates to more strategic measures being taken across the town to improve cycle routes, through the Local Transport Plan and the Ipswich Cycling Strategy.
- 9.22.4 An explicit requirement to set maximum car parking standards is no longer part of national planning policy. This previous approach has led to parking on verges and on street in a number of recent developments, to the detriment of the street scene and highway safety.

- 9.22.5 Local planning authorities are now free to apply parking standards that are appropriate and necessary to address local circumstances. In Ipswich, the standards within the Suffolk Guidance for Parking (November 2015, updated May 2019) are currently being applied. Standards for residential parking within IP-One will be identified through the Low Emissions Strategy Supplementary Planning Document, which is under preparation.
- 9.22.6 Whilst the emphasis of transport policy remains firmly on encouraging people to switch to more sustainable modes where possible, it is also recognised that many people still own cars. Therefore, adequate levels of residential parking should be provided that uses land efficiently and is designed in from the outset to ensure that cars do not dominate the street scene. Underground parking is also an efficient way to accommodate the car and should be considered where this is acceptable in flood risk terms as demonstrated through a Flood Risk Assessment. Car parking can be appropriate in areas subject to flooding, provided that flood warnings are available and signs are in place. When considering car parking within flood risk areas, the ability of people to move their cars within the flood warning time should be considered. Boundary treatments such as railings should ensure that if vehicles become mobilised during a flood event, they are contained within the confines of the site but still allow the free movement of flood water. Long-term and residential car parking is unlikely to be acceptable in areas which regularly flood to a significant depth due to the risk of car owners being away from the area and being unable to move their cars when a flood occurs.
- 9.22.7 There are a number of publications which look at the design of car parking in more detail, notably 'Car Parking: What Works Where' (English Partnerships, 2006) and 'Manual for Streets' (Department for Transport, 2007). Where communal parking is necessary, rear parking courtyards should be avoided unless they are well-designed and overlooked. Owners should preferably be able to view their vehicles from active rooms within the building. Secure By Design guidance should be followed when providing underground parking to ensure that it is safe and secure.
- 9.22.8 In order to reduce congestion, manage air quality and encourage a modal shift away from the car, particularly amongst the commuting public, it is important to limit long-stay car parking within the central car parking core and for organisations to encourage employees to travel to work by more sustainable means through travel planning. Therefore, only necessary operational parking will be allowed for new non-residential development within the central car parking core. This excludes staff parking but would include access which is considered essential.

## **POLICY DM23: The Density of Residential Development**

**The density of new housing development in Ipswich will be as follows:**

- a. within the town centre, Portman Quarter (formerly Ipswich Village) and Waterfront, development will be expected to achieve a high density of at least 90 dwellings per hectare (dph);**
- b. within the remainder of IP-One, District Centres and an 800m area around District Centres, development will be expected to achieve a medium density of at least 40 dph (the average will be taken as 45 dph); and**
- c. elsewhere in Ipswich, low-density development will be required (the average will be taken as 35 dph).**

**Exceptions to this approach will only be considered where:**

- a. the site location, characteristics, constraints or sustainable design justify a different approach; or**
- b. a different approach is demonstrated to better meet all housing needs in the area.**

**To ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will require developers to meet the Nationally Described Space Standards set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015) unless it can be demonstrated that it would not be viable.**

9.23.1 The NPPF states the plans should include the use of minimum density standards for town centres and other locations that are well served by public transport. It also recommends that minimum density standards should be considered for other parts of the plan area that reflect the accessibility and potential of different areas. The three minimum density standards set out in the policy provide an appropriate balance of densities for different areas of Ipswich, based on their accessibility and surroundings, and will help to make efficient use of land in the town.

9.23.2 Between 2001 and 2014 the main housing supply in Ipswich has been flats and as a result actual densities achieved residential schemes in Ipswich have been high. Housing completions in Ipswich broadly followed the trend in England growing to a peak in 2007/8, followed by decline until 2012/13 and a recovery thereafter. The 2007/08 peak included large-scale flatted development at the Ipswich Waterfront. Densities are reported in the Council's annual Authority Monitoring Report.

9.23.3 However, the density figures in the policy (especially the high density figure) were revised downwards as part of the 2017 Local Plan, to take account of the following factors:

- The effect of the economic downturn on market demand for flats;
- The need for the balance of housing delivery to swing towards houses until the market for flats recovered;
- Sustainable design such as designing for passive solar gain, which will be essential to meeting the Borough's carbon reduction obligations, can impact on the layouts and configurations that may be achievable;
- Sustainable drainage requires more space in some areas of town and impacts on achievable site density;

- Flats will still be needed, but they may need to be bigger to attract older households away from family houses, and in some cases to cater for families also; and
- The mix policy for larger sites (policy CS8) means that 100% flatted development on most major scheme sites will not be acceptable.

9.23.4 Ipswich Borough Council has reviewed the densities outlined in the policy in relation to viability. However early viability testing indicates that higher densities are unlikely to be viable due to a combination of rising build costs and relatively low sales values for flats, particularly larger two and three-bedroom flats. The results of the Viability Assessment of the Local Plan Review will provide further information on this. Notwithstanding this, the densities set out in the policy are minimum standards and this does not prevent developments being brought forward at higher levels where appropriate.

9.23.5 In the vicinity of the Waterfront and Civic Drive in central Ipswich, the Council will expect high density developments to exceed the minimum set out in the policy, because this is the area where tall buildings may be appropriate as identified through policy DM15. This also more closely reflects site capacities achieved through recent planning permissions. The Council will expect all new residential developments to meet the Nationally Described Space Standards set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015). This is in order to ensure that future occupants have acceptable living conditions and that there is enough space, including sufficient storage, for dwellings to be used flexibly by a range of residents.

9.23.6 It is important to strike an appropriate balance between providing freedom and flexibility for the housing market to operate and ensuring that land is used efficiently by achieving higher densities in the most sustainable locations. The exceptions in the above policy allow a degree of flexibility in controlled conditions, such as for example to protect heritage assets and landscape. Sites on the urban edge of Ipswich may require lower densities in certain circumstances where development needs to respond sensitively to the adjacent countryside and surrounding character. The averages referred to will be used to calculate site capacities.

## **POLICY DM24: Protection and Provision of Community Facilities**

The Council will work with partners to ensure that a range of local community facilities and services are made available and retained to meet local needs.

**The Council will:**

- a. **Ensure existing community facilities are retained unless one of the following tests is met:**
  - i. **The applicant can demonstrate to the Council's satisfaction that the facility is genuinely redundant, adequately marketed and surplus to current and future requirements; or**
  - ii. **Alternative provision of an equivalent or better facility is proposed or available within a reasonable distance to serve its existing users.**
- b. **Take into account listing or nomination of 'Assets of Community Value' as a material planning consideration and encourage communities to nominate Assets of Community Value;**
- c. **Where possible and appropriate, facilitate shared community spaces for the delivery of community services;**
- d. **Direct new community facilities towards the borough's centres, or locations which are accessible to the facility's catchment, depending on the scale and nature of the proposal; and**
- e. **Expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements.**

**Having regard to public houses, a marketing strategy for the public house must be agreed with the Local Planning Authority prior to applying for planning permission for change of use or redevelopment.**

**The Council will seek to protect public houses, which are of community, heritage or townscape value.**

**The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is demonstrated to the Council's satisfaction that:**

- a. **the proposal would not result in the loss of pubs which are valued by the community (including protected groups) unless there are equivalent premises capable of meeting the community's needs; or**
- b. **there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term.**

**Where a public house is converted to an alternative use, the Council will seek the retention of significant features of historic or character value.**

**Applications involving the loss of pub floorspace, including facilities ancillary to the operation of the public house, will be resisted where this will adversely affect the operation of the public house.**

**The Council will support the provision of new public houses in appropriate sites in growth areas, other highly accessible locations and town centres, subject to other policies in this Plan.**

#### Community Facilities

- 9.24.1 This policy seeks to maintain a range of local community facilities across the borough to meet local needs.
- 9.24.2 For the purpose of this policy, community facilities include a range of social infrastructure that provides a service to the community. This may include:
- Healthcare facilities;
  - places of worship;
  - meeting halls;
  - public houses;
  - post offices;
  - youth clubs;
  - education facilities; and
  - police facilities.
- 9.24.3 These facilities form a vital part of town centres and neighbourhoods and address the local community's needs. Community uses are different to Town Centre Uses in this respect (see policy CS14).
- 9.24.4 Open space, play provision and arts and cultural facilities are also important community facilities and are dealt with under separate policies.
- 9.24.5 Part A seeks to resist the loss of the borough's valuable community facilities, except in certain circumstances (see a and b).
- 9.24.6 In order to demonstrate that there is no demand for the continued use of the current community facility, sufficient marketing evidence should be provided which adequately illustrates that there is no longer a genuine need for its retention. Details of the marketing requirements are set out in appendix 6. In the case of health facilities, the loss or change of use of existing health facilities will be acceptable if it is shown that this forms part of a wider estate reorganisation programme to ensure the continued delivery of services. Evidence of such a programme will be accepted as a clear demonstration that the facility under consideration is neither needed nor viable and that adequate facilities are or will be made available to meet the ongoing needs of the local population. In such cases no viability or marketing information will be required.

#### Public Houses

- 9.24.7 Public houses (pubs) play an important community and cultural role. As places where members of the community meet and gather, they support social wellbeing and strengthen community cohesion. They sometimes provide important community meeting space and host local meetings, events and entertainment.
- 9.24.8 Like many other boroughs, Ipswich has witnessed a net loss of public houses. The policy therefore aims to afford greater protection to the boroughs public houses.
- 9.24.9 National planning policy recognises that public houses, along with other community facilities, enhance the sustainability of local communities and should be safeguarded and retained for the benefit of the community while allowing them to develop and modernise in a sustainable way.
- 9.24.10 The overall aim of the policy is to ensure that the Council is able to protect all of its public houses which provide a significant benefit or value to the local community.

- 9.24.11 In order to satisfy the policy a marketing strategy for the public house must be agreed with the Local Planning Authority prior to its implementation and the agreed strategy implemented for a minimum period of 12 months prior to applying for planning permission. Further information regarding the requirements of the marketing strategy are set out in appendix 6.
- 9.24.12 Applicants seeking to reduce or remove floor space or outdoor space must demonstrate that the remaining space is of sufficient size and quality for the needs of pub users and that the pub could continue to operate viably following any loss or reduction. The information submitted should include as a minimum viability evidence which considers the ability of the pub to continue to trade.

## **POLICY DM25: Shopfront Design**

The Council recognises that shop fronts play a key role in creating attractive and vibrant areas.

**The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features.**

**When determining applications for shopfront development the Council will require proposals to:**

- a. respect the existing character, architectural and historic merit of the building and its shopfront, including details and materials;**
- b. improve the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt;**
- c. reflect the general characteristics of well-designed shopfronts in the area;**
- d. contribute towards community safety and natural surveillance; and**
- e. be suitably accessible.**

**Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention. Where a new shopfront forms part of a group where original shop fronts survive, its design should complement their quality and character.**

### **Protecting existing shopfronts**

9.25.1 This policy gives effect to Core Strategy policy CS1. It builds on national policy in the National Planning Policy Framework which states that planning plays a key role in supporting the delivery of renewable and low carbon energy.

9.25.2 We will seek to protect existing shopfronts that make a significant contribution to the appearance and character of an area, taking into account the quality of design, historic importance and location.

### **Design of new shopfronts**

9.25.3 The attractiveness of shopfronts can usually best be maintained by taking inspiration from the architecture of the building and neighbouring premises and reflecting the scale and pattern of shopfront widths in the area. New shopfronts should contribute towards the maintenance of a cohesive streetscape appearance. The Council will seek to repair harm caused through past unsympathetic development whether previously authorised or not.

9.25.4 As shopfronts are seen at close quarters, the detailing, type and quality of materials, execution and finishes are very important. Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all.

### **Shop windows**

9.25.5 Shop windows provide views into and from premises and can help bring activity and enhance feelings of security by providing natural surveillance. Security features associated with shop window displays should generally be internal in order to avoid harming the appearance of shop premises and creating clutter. Solid shutters are generally not considered to be acceptable as they are unsightly and can generate feelings of insecurity in those walking by, hide internal intruders, and encourage graffiti.

9.25.6 The supplementary planning document Shop Front Design Guide provides more detail on the Council's approach to the design of shopfronts.

## **POLICY DM26: Advertisement**

This policy applies to all advertisements requiring advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

**The Council will require advertisements to preserve or enhance the character of their setting and (where attached) to the host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.**

**We will refuse advertisements that:**

- a. contribute to an unsightly proliferation of signage in the area;**
- b. result in excessive street clutter in the public realm;**
- c. cause harmful light pollution to nearby residential properties or wildlife habitats; or**
- d. impact upon public safety.**

- 9.26.1 Advertisements and signs should be designed to be complementary to and preserve the character of the host building and local area.
- 9.26.2 The supplementary planning document Shop Front Design Guide provides more detail on the Council's approach to the design of shopfronts.
- 9.26.3 The size, location, materials, details and illumination of signs must be carefully considered. The Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area.
- 9.26.4 Advertisements in conservation areas and on or near listed buildings require particularly detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.
- 9.26.5 Advertisements should not become unduly dominant in the street scene, cause light pollution that disturbs residents at night, cause light pollution to wildlife habitats, or cause safety hazards to drivers. To achieve these aims, consideration should be given to the intensity of illumination, surface area to be illuminated and the positioning and colours of advertisements. The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc.) should be determined by the design of the building. Illuminated signs, both internal and external, should not be flashing or intermittent.
- 9.26.6 Advertisements will not be considered acceptable where they impact upon public safety, including when they:

- obstruct or impair sight lines to road users at junctions and corners;
- reduce the effectiveness of a traffic sign or signal;
- result in glare and dazzle or distract road users;
- distract road users because of their unusual nature;
- disrupt the free flow of pedestrian movement; or
- endanger pedestrians forcing them to step on to the road.

## **POLICY DM27: The Central Shopping Area**

9.27.1 The Government recognises that the role of town centres is changing from its traditional retail high street approach. Town centres need to be dynamic and flexible in order to remain relevant and to be able to compete effectively with other retail sources such as on-line shopping as well as accommodating wider town centre uses. This is reflected in the Government NPPF and updated PPG 22 July 2019. The Government advises that Councils review the town centre and create character zones.

**The Council will support the town's vitality and viability by promoting and enhancing appropriate development in the Central Shopping Area, building in flexibility to meet the needs of retailers and leisure businesses appropriate to the Central Shopping Area.**

**The Central Shopping Area comprises the Primary, Secondary and Specialist Shopping Zones, which are defined on the IP-One Area inset map. Sites identified as suitable for major retail investment will be allocated in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.**

**Class A1 retail use should remain the predominant use at all times in the Central Shopping Area, to ensure the strategic retail function of Ipswich is maintained.**

- a. **Primary Shopping Zone – this is the principal retail centre for Ipswich. Other complementary uses to the principal retail function will be permitted such as coffee shops, hairdressers and restaurants. However, 70% of uses in the primary shopping zone are required to be primary retail uses on the ground floor. An exception to this is the first floor of the Sailmakers Shopping Centre. Here A5 uses will not be permitted. Complementary uses such as hairdressers, coffee shops and restaurants will be supported.**
- b. **Secondary Shopping Zone – A2-A5 uses, betting shops and payday loan shops and other main town centre uses will be permitted where they will not exceed 35% of the units within the zone, provided the proposal does not create a concentration of more than three adjacent non-A1 units, and the site is not adjacent to an existing non-A1 use within the same Use Class as the proposal. No more than 10% of the total identified units within the Secondary Shopping Zone will be permitted for A4 or A5 uses. The Council will support Local Development Orders which help to maintain an appropriate mix of uses and will support the use of pop-up shops and restaurants for up to 3 years in accordance with the General Development Order both to bring vacant units back into use and to allow entrepreneurs the opportunity to test their business models. This could also include limited use of training centres and other such uses appropriate to the secondary shopping zone.**
- c. **Specialist Shopping Zone – This zone comprises of non-multiple retail uses, specialist shops such as music shops and services such as beauticians and hairdressers and jewellers or bespoke clothing and bags. Many of the units are listed buildings. It is in this zone and the secondary shopping zone where there are the majority of unlet units. Again, the Council supports the use of unlet units for pop-up shops and restaurants as in the Secondary shopping zone above. Wider NPPF defined town centre uses will be permitted where they will not exceed 40% of the units. No more than 35% of the total identified units within the identified sub-group of the Specialist Shopping Zone will be permitted for A2, A4 or A5 uses.**

**Proposals for non-A1 uses that would exceed the maximum thresholds outlined for the zones above will only be permitted in circumstances where it can be robustly demonstrated that such a change would be beneficial to the vitality and viability of the shopping zone, such as uses that help to attract people to visit the centre during the evening, as well as flats above shops.**

**A3, A4 and A5 uses and other main town centre uses will only be permitted where they have no detrimental effect on the amenities of nearby residential accommodation in terms of noise, fumes, smell, litter and general activity generated from the use and retain an active frontage.**

**Mixed use development, including B1 office, A2 financial and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Central Shopping Area, provided there is a ground floor use in accordance with the zone guidance above.**

**The Council will not grant planning permission for the use of a ground floor unit to a use falling outside classes A1 to A5 in Primary Shopping Zones; and falling outside A1 to A5 or a suitable town centre use as defined by the NPPF in the Secondary Shopping Zones.**

**The Council will support opportunities to use vacant shopfronts for uses such as pop-up shops and restaurants to promote the Town Centre in accordance with the General Development Order requirements and to help potential entrepreneurs test their business models for up to 3 years. It will also work closely with other organisations so that a shared vision is created for the 21st century.**

**The Council also supports the retention of the open market and will work to ensure it meets the needs of residents and visitors to the Borough**

**Developers need to also ensure that proposals contribute positively to the objectives of the “Ipswich Town Centre and Waterfront Public Realm Strategy” SPD and Shopfront Design Guide and other relevant SPD. The Council will expect the creation of a dementia-friendly town centre which is fit for all.**

9.27.2 Protecting the vitality and viability of the town centre and district and local centres is a key part of national policy and the importance of the town's shops is set out in the strategic policies of the Core Strategy. The NPPF advises that town centre policies should:

- Define a network and hierarchy of town centres and promote their long-term vitality and viability;
- Define the extent of centres and primary shopping areas;
- Retain and enhance existing markets;
- Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed;
- Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre, where suitable and viable town centre sites are not available; and
- Recognise that residential development often plays an important role in ensuring the vitality of centres.

9.27.3 The purpose of the Central Shopping Area (CSA) is to focus retail activity within a defined, concentrated area and enable visitors to easily combine other activities in the centre with their shopping trip, such as meeting friends at a café, going to the bank or having a haircut. The concentration of activities benefits shoppers who wish to compare goods and prices in different shops before making their purchases or combine several activities in one trip, and retailers who

want to see the maximum footfall possible outside their store. The policy approach of concentrating such activity within a defined area supports the vitality and viability of the centre.

- 9.27.4 The CSA boundary has been amended, to include additional land at Princes Street and exclude the former police station at Elm Street. These changes respond to evidence in the Ipswich Retail and Commercial Leisure Study 2017. The Council considers that the boundary changes will help to strengthen the CSA's vitality and viability. Annual monitoring of town centre indicators such as shop vacancy will continue to be used to assess the CSA's health.
- 9.27.5 Within the CSA, the predominant land use at ground floor level should be shops (i.e. Use Class A1 retailing). However, there are other uses which complement A1 shops, which also have a role to play within the CSA, for example: financial and professional services such as banks (class A2), cafes and restaurants (class A3), drinking establishments (class A4) hot food takeaways (class A5) and main town centre uses including leisure, entertainment, offices, arts, culture and tourism and residential uses.
- 9.27.6 The CSA is therefore divided into three 'Shopping Zones'. The Primary Shopping Zone is the area where the greatest concentration of A1 retail uses is expected. It is a relatively small area which largely coincides with the 'prime pitch' for retailers and it has the highest rents and footfall. The Secondary Shopping Zones are generally characterised by lower rents and footfall than the Primary Shopping Zone. In these areas, the focus remains on A1 retailing, but a greater diversity of uses is permitted. The Specialist Shopping Zones contain the greatest diversity of uses. Shops tend to be in smaller units occupied by more specialist retailers. Some of the streets in this area consist of attractive historic buildings, which give them a special character, for example St Peters Street and Fore Street. For the purposes of the sequential approach to locating new retail development, only the Primary and Secondary Shopping Zones defined on the IP-One Area inset policies map would be considered 'in town centre' sites defined through the NPPF as the primary shopping area. The shops or units within each of the three zones in the CSA are broken down into groups. The groups usually consist of a collection of buildings located in close proximity fronting the street or pavement, segregated by intersecting streets.
- 9.27.7 The previous Local Plan assessed individual frontages within each zone, which were monitored and updated annually. In practice, however, the application of applying the thresholds of each zone to individual frontages resulted in a policy that was unable to respond to the changing make-up and retail experience of these zones. There were instances where the policy restricted empty retail (A1) units from being brought back into alternative uses due to concentrations of non-A1 uses on a particular street frontage being too high. In addition, the frontage measurement approach often made it difficult to apply flexibility to given frontages, as some uses had frontage lengths that were disproportionate to the length of the street.
- 9.27.8 To respond to the above issues, the frontages have now been amalgamated to support a greater degree of flexibility in the CSA. The Primary Shopping Zone is formed of one centralised area in the heart of the town. The Secondary Shopping Zones consist of Upper Westgate Street ('Sec4'); Lloyds Avenue ('Sec5'), Queen Street & Princes Street ('Sec3'); and Carr Street & Upper Brook Street ('Sec6'). The Specialist Shopping Zones are made up of the units to the south of the CSA in 'the Saints' and Fore Street ('Spec1'), and a small group at Providence Street ('Spec2'). These are demarcated on the map provided at Appendix 7.

- 9.27.9 In addition, the process for counting the percentages within each zone has been changed from a frontage measurement approach to a unit number approach to provide a more straightforward means of calculating the percentages. The zones will continue to be updated in the yearly Central Shopping Area Survey Report and this will form the basis of determining the proportion of units in a given area, unless more recent verified evidence is provided with applications.
- 9.27.10 In cases where applicants are proposing a change of use from an A1 to a non-A1 use that would fall above the defined thresholds, it is advised that they enter into pre-application discussions with the Council to determine the type of information that would be required to robustly demonstrate that it would add to the vitality and viability of the zone. In order to demonstrate that exceptional circumstances warrant the proposed non-A1 use, the following factors will be considered:
- The amount of time that the existing use has been vacant, including any information regarding the marketing of the unit;
  - The presence of other vacant A1 units in the Shopping Zone, including any information regarding the marketing of these units;
  - The contribution that the proposed non-A1 use would make to the vitality and viability of the Shopping Zone and wider Central Shopping Area;
  - The active frontage of the proposed non-A1 use, taking into consideration the physical frontage, hours of use and type of use; and
  - The size of the unit.
- 9.27.11 The approach to land use within the CSA is to maintain a balance between A1 retail and other appropriate uses, through the control of units within the zones. The Town and Country Planning General Permitted Development Order 2015 introduced new permitted development rights for existing A1 units however the policy remains relevant due to size limitations contained within the new Order. Uses in the CSA are monitored and updated annually.
- 9.27.12 In the Secondary and Specialist Shopping Zones, the previous percentages have been retained in this plan but the policy now also refers to other main town centre uses being supported, in recognition of the need for centres to offer a range of attractions in order to maintain vitality and viability.
- 9.27.13 Protecting the visual character of listed buildings in the Central Shopping Area is covered elsewhere.
- 9.27.14 Mixed-use development will be supported in the Central Shopping Area only where a ground floor use in accordance with policy DM27 is provided. This reflects government policy to encourage diversification and mixed uses, and can help to create a vibrant centre including outside shopping hours. Main town centre uses as defined in the NPPF will only be permitted within the Central Shopping Area where specified criteria are met as set out in policy DM27.
- 9.27.15 Under a change to the Permitted Development Order that came into force on 30th May 2013, changes from a use falling within Classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments), Class A5 (hot food takeaways), B1 (business), D1 (non-residential institutions) and D2 (assembly and leisure) to another use within that same group of uses became, for a temporary period of up to two years, Permitted

Development. Such changes are subject to Prior Notification of the local planning authority and exclude changes to floor areas in excess of 150 square metres and listed buildings. Monitoring indicates that there have been few such changes of use to date within the CSA.

- 9.27.16 The Council will seek funding opportunities to make environmental enhancements to the public realm of the centre and help it to remain competitive and attractive to users. The priority for improvements during the plan period will be the Cornhill, Tavern Street and Westgate Street. These enhancements should follow the key design principles set out in the Council's SPD "Ipswich Town Centre and Waterfront Public Realm Strategy" with a view to creating a dementia-friendly environment and a public realm fit for all. Where shopfronts are vacant and no longer providing an active frontage on the street, the Council will support opportunities to successfully use these frontages where they help to promote the vitality of the Town Centre. This could be through visual enhancements. Works to the shopfront which require advertisement consent and/or planning permission will need to also adhere to the principles of policies DM25 (shopfront) and DM26 (advertisements), as well as the Shopfront Design Guide SPD.

**POLICY DM28:**  
**Arts, Culture and Tourism (formerly policy SP14)**

**The Council will support the retention and enhancement of existing facilities providing arts, cultural and tourism facilities, including visitor accommodation throughout the Borough. Alternative uses will only be considered where it can be demonstrated that the current use is either being satisfactorily relocated or is unviable or that the new use complements the arts, culture and tourism sectors and supports the vitality and viability of the town centre. Retail development would need to satisfy policy DM32. In order to demonstrate that the current use is unviable sufficient marketing evidence should be provided. Further information regarding the requirement of the marketing strategy are set out in appendix 6**

**New facilities for arts, culture or tourism including accommodation will be supported where they are focused within the town centre boundary or within the Waterfront area.**

**Where new arts, culture and tourism facilities or visitor accommodation are proposed in locations outside the town centre or Waterfront, planning permission will only be granted in accordance with policy DM31.**

**The Council will support the creation of a purpose built, multi-purpose space on the Waterfront which will be either a stand alone facility, or part of a mixed use development, capable of providing flexible conference and exhibition space.**

- 9.28.1 The town has a wealth of arts, cultural and heritage assets, which enrich the lives of Ipswich residents and bring in a significant number of visitors. There are approximately 2.6 million day visitors per year and 1.0 million longer stay visitors, including those from overseas and the rest of the UK (Ipswich Town Centre Master Plan, 2012). They support directly and indirectly a significant number of full and part-time jobs.
- 9.28.2 Focussing art, cultural and tourism uses within the town centre will aid in the delivery of the spatial strategy for sustainable growth through urban renaissance, by making the best use of previously developed land, by putting facilities in close proximity to those who need them, and by providing regeneration opportunities to key strategic town centre sites, thus enhancing the vitality and vibrancy of the central area. It also accords with national planning policy for 'main town centre uses'.
- 9.28.3 The Council's intention is to support the diverse nature of arts, cultural and heritage facilities in Ipswich, by allowing improvements to existing facilities. These assets support employment in a fast growing sector, and generate economic activity which in turn supports town centre regeneration, and provides cultural diversity and choice for those living in and visiting Ipswich. Arts, cultural and heritage assets contribute to the vitality and viability of the town centre by providing attractions and facilities which are complementary to the main retail and employment function, and can be easily accessed.
- 9.28.4 The English Tourism Board has indicated that Tourism is worth £5 billion a year to the Eastern Region, with the tourism sector now employing 185,000 people. Tourism is one of the main components of the visitor economy and it has been identified as one of the fastest growing

sectors of the global economy. Visitor accommodation is integral to the provision of jobs growth in Ipswich, and as such the provision of quality accommodation for a wide variety of visitor needs will support the objectives of policy CS13.

9.28.5 Policy CS4 identifies the Council's commitment to protecting and enhancing the Borough's heritage of built, historic and natural assets including listed buildings, museums, parks and gardens and the river corridor. The cultural activity associated with these assets provides a crucial link with the visitor economy and should therefore be maintained and enhanced to ensure that this offer remains attractive. Retaining and enhancing existing facilities will benefit heritage assets that are currently used for arts, cultural and tourism purposes, while new facilities could also be beneficial provided they are appropriately design and located. Core Strategy Review policy DM13 deals with heritage assets and conservation. The Council's Town Centre Master Plan (2012) identifies improved facilities for performance arts, arts, museums and heritage, public art and events as areas to support.

9.28.6 The Council will therefore be supportive of:

- Improvements to Ipswich Museum and adjacent buildings, including Ipswich Art School, Wolsey Studio, and High Street Exhibition Gallery;
- the New Wolsey Theatre, Corn Exchange and Regent Theatre;
- Christchurch Mansion and Park; and
- the creation of a multi-purpose exhibition and conference facility, which could include a live entertainment venue, at the Waterfront.

9.28.7 The Council will also support street performance and 'pop-up' temporary facilities related to cultural events and festivals in appropriately located public spaces and vacant premises, where they do not prejudice other Local Plan policies.

9.28.8 High quality arts and cultural facilities play an important role in attracting and retaining residents to the town. The IBC Culture and Leisure Needs Study 2010-2025 found that quality provision and a thriving arts and cultural scene can help to increase a town's appeal to students selecting a university and retain graduates on completion of their degree due to their positive experiences. It is seen that the encouragement of street theatre and performance in the town centre would help to develop awareness of, and exposure to, the arts, and therefore be of benefit to the visitor economy.

## **POLICY DM29: The Evening and Night-time Economy**

**The council will encourage and support the sustainable growth of Ipswich's evening and night-time economy which will contribute to the vitality of the town centre, subject to addressing the following considerations:**

- **The design of development and management arrangements particularly focusing on public safety, crime prevention and reduction of anti-social behaviour;**
- **That there will be no significant individual or cumulative effect on the surrounding amenity and character of the area due to noise, litter, odour, severe traffic generation, parking, general disturbance or problems of disorder and nuisance;**
- **Arrangements for mitigating pollution including ventilation equipment, grease disposal, grease traps and noise insulation are provided in a way that minimises visual and environmental impact;**
- **Access requirements for people of all ages and abilities are provided; and**
- **The day time use does not detract from the character and amenity of the surrounding area, shops and services, particularly through the creation of an active ground floor street frontage.**

**Development proposals will not be permitted in locations where they exacerbate existing problems when considered against the criteria set out above.**

- 9.29.1 Evening activities that take place after 5pm can help maintain a strong and successful town centre vibrancy, as they extend activity and movement beyond the normal working hours. This makes town centres more attractive places to live and work. It is, however, important to maintain the right balance with the town centre's primary function as a shopping and commercial centre. The evening uses must therefore be complementary to, rather than conflict with, other town centre uses. The evening and night-time economy in Ipswich has developed over many years. If managed well a successful evening and night-time economy becomes an important part of the town's character. The economy can be boosted by the creation of jobs, increased visitor numbers and providing the right atmosphere to enhance the town's offer of arts and cultural events. The council will plan positively for a range of complementary evening and night-time 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.
- 9.29.2 The promotion of an evening and night time economy in Ipswich needs to be appropriately managed to ensure that community safety is protected and anti-social behaviour is not increased. Proposals should be sited in appropriate locations, and should consider the cumulative impact on the character and function of the town centre, crime and local amenity.
- 9.29.3 In some town centre locations the clustering of evening and night-time uses has led to an adverse impact on local amenity. Proposals which exacerbate existing problems, such as anti-social behaviour, will be resisted by the council.

## **POLICY DM30: District and Local Centres**

The Council will support the retention and provision of local shops and community facilities within defined District and Local Centres. The Centres are defined on the policies map and IP-One Area inset policies map.

Within the defined District and Local Centres:

- a. proposals for the provision of additional shops or extensions to existing shops will be permitted provided they are of a scale appropriate to the centre. The requirements of the National Planning Policy Framework (NPPF) should be satisfied;
- b. proposals for change of use from A1 to A2-A5, betting shops and payday loan shops and D1 uses and sui generis uses appropriate to a centre, including laundrettes, will be permitted where they will not exceed 40% of the total identified ground floor frontage, provided the identified shopping frontage or the shopping character and range of shops is not unacceptably diminished. No more than 20% of the total identified ground floor frontage will be permitted for A4 or A5 uses;
- c. proposals for the change of use of ground floor units to community facilities will be permitted provided that:
  - i. satisfactory vehicular access and car parking can be provided;
  - ii. in the case of a vacant unit, the unit has suffered from a clearly demonstrated long-term vacancy for a period of at least 12 months. A marketing strategy for the unit must be agreed with the Local Planning Authority prior to its implementation and the agreed strategy implemented for a minimum period of 12 months prior to applying for planning permission for change of use or redevelopment. Any such application must be accompanied by an independent appraisal of the economic viability of the facility in its current use; and
  - iii. the physical treatment of the unit minimises the problem of dead frontages or is appropriate to the proposed use.
- d. Residential uses will not be permitted on ground floor unless it has been clearly demonstrated the unit has suffered from long term vacancy for at least 12 months and none of the uses stated in paragraphs a, b and c are suitable, viable or deliverable.

Outside District Centres but within a 400m straight line distance of the centre the provision of community facilities will be permitted provided the facility:

- e. is appropriate in scale and supports the needs of the adjacent residential area;
- f. is accessible to all sectors of the community; and
- g. offers satisfactory vehicular access and car parking space in accordance with the Council's standards.

One new District Centre is proposed within the plan period at Sproughton Road. This centre will provide retail units and community facilities of a scale appropriate to serve its

**catchment area. Development of the Ipswich Garden Suburb in accordance with policy CS10 will require the provision of a new District Centre and two new local centres.**

- 9.30.1 District and Local Centres perform an important role serving, to varying degrees, the day-to-day convenience, food and services needs of their local resident catchment populations. Ipswich contains 11 existing District Centres and 34 Local Centres (with additional centres of both types proposed through the Core Strategy).
- 9.30.2 The District Centres are the more strongly performing centres and rely on a stronger convenience retail offer to underpin their function, vitality and viability. All the District Centres contain a supermarket. The District Centres also tend to be located on radial routes and benefit from some passing trade.
- 9.30.3 The Local Centres tend to contain fewer units than the District Centres and offer a more limited diversity of uses. However, they remain an important facility for meeting people's every day needs.
- 9.30.4 The approach to District and Local Centres is to strengthen their role and function and seek to retain shops and community facilities. Within the District and Local Centres, a balance between A1 retail (shops) and non-A1 uses (such as food and drink establishments) will be maintained. A2 to A5 uses and sui generis uses appropriate to a centre will also be supported, provided the overall percentage of the frontage does not exceed the levels specified in the policy. District centres are listed under policy CS2. The local centres are listed below (with reference numbers for cross reference to the policies map).
- Fircroft Road (1)
  - Garrick Way (2)
  - Dale Hall Lane/Dales Road(4)
  - Ulster Avenue (5)
  - Norwich Road (197-307a) (6)
  - Dickens Road (8)
  - Cambridge Drive (10)
  - Maidenhall Green (12)
  - Ellenbrook Green (14)
  - Colchester Road (61-65) (15)
  - Brunswick Road (16)
  - Cauldwell Hall Road/Spring Road (19)
  - Cauldwell Hall Road/St John's Road (20)
  - Foxhall Road (25-97, 34-124) (21)
  - Bixley Road/Foxhall Road (22)
  - Selkirk Road (24)
  - Clapgate Lane (207-221)/Landseer Road (325-327a) (25)
  - Reynolds Road (26)
  - Queen's Way (29)
  - Felixstowe Road (474-486) (30)
  - Peshurst Road (31)
  - Cliff Lane (32)
  - St Helen's Street (33)
  - Bramford Lane (34)
  - Bramford Road (35)
  - Spring Road (36)
  - Albion Hill, Woodbridge Road (291-386) (37)
  - Lavender Hill (38)
  - Bramford Road (560 and 651-677) (40)
  - Bramford Lane (483-487) (42)
  - St Matthew's Street (44)
  - Woodbridge Road (28-110) (46)

- 9.30.5 The policy will help focus community development in the Local and District Centres. The community facilities are defined in Appendix 2.
- 9.30.6 Zonal maps for each District Centre to support community facilities within 400m straight-line distance are defined on Plan 1. Local Centres are also defined on Plan 1.
- 9.30.7 As an indication of appropriate scale the Council expects additional food stores in District and Local Centres should not exceed 1,500 sq. m. net. This is to ensure the development is of a scale appropriate to serve the centre and not the town as a whole, which could in effect divert retail away from the town centre. The applicant should also demonstrate that it can meet the requirements as set out in the NPPF, which covers the following points:
- a. that the development is of an appropriate scale;
  - b. that there are no more central sites for the development;
  - c. that there are no unacceptable impacts on existing centres; and
  - d. that locations are accessible.
- 9.30.8 The approach is to maintain a balance between retail and non-retail uses, through the control of frontages. An analysis of the existing frontages in a sample of the District and Local Centres supports the increase in the thresholds of A2 to A5 uses to 40%.
- 9.30.9 The introduction of use class categories A4 and A5 (drinking establishments and hot food takeaways previously use class A3) has been reflected in the policy. This will assist in controlling the night-time economy. A proportion of 20% has been set, which is higher than the threshold set for the Central Shopping Area, but appropriate, as the District and Local Centres serve residential communities.
- 9.30.10 The policy allows change of use to take place from retail to proposals for community uses where certain criteria apply. Residential uses will be encouraged on upper floors in the centres and in the vicinity of the centres to maximise access to shops and facilities. Accessible under clause f of policy DM30 relates to community facilities being accessible by a range of transport modes including for those without a car.
- 9.30.11 The boundaries of the District Centres are shown on the policies map and, within them, policy DM30 applies to development proposals. Developers of new properties will be expected to comply with policy DM28 and the Shopfront Design Guide SPD.

## **POLICY DM31: Town Centre Uses Outside the Central Shopping Area**

**Within the Town Centre, which is defined on the IP-One Area inset policies map, but outside the Central Shopping Area, the development of non-retail town centre uses, including leisure, recreation, culture and tourism uses, will be permitted. This area must be considered before edge or out of centre locations for these town centre uses. B1 office uses and mixed use schemes including housing will also be encouraged in the town centre, however industrial uses (B-Class uses excluding offices) will not be permitted.**

- 9.31.1 The National Planning Policy Framework (NPPF) defines a town centre as an area defined on the policies map, which includes the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. The main town centre uses are defined in the following paragraph. In the Ipswich Local Plan, the primary shopping area consists of the Primary and Secondary Shopping Frontage Zones (see policy DM27).
- 9.31.2 This policy reflects the NPPF, which identifies the main uses appropriate to a town centre as: retail (including warehouse clubs and factory outlet centres); leisure (such as dance halls), entertainment facilities, intensive sports and recreation facilities such as cinemas, restaurants, bars, night clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls; offices; and arts, culture and tourism including theatres, museums, galleries, concert halls, hotels and conference facilities. In addition, living is encouraged within town centres, to improve vitality and viability outside business hours and enable sustainable lifestyles.
- 9.31.3 The non-retail main town centre uses which are managed through this policy are predominantly focused away from the Central Shopping Area, with the exception of a small element permitted in the Secondary and Specialist Shopping Areas or as part of certain mixed use developments as described in policy DM27, in order to maintain A1 retail use as the predominant use in the Central Shopping Area. For the development of non-retail town centre uses outside the Town Centre, the NPPF shall apply.
- 9.31.4 The town centre boundary is defined through the IP-One Area inset policies map. It overlaps to a degree with Ipswich Waterfront and Portman Quarter.
- 9.31.5 The criteria for identifying the town centre boundary are therefore a predominance of main town centre uses within it, areas adjacent to the Central Shopping Area containing sites allocated for main town centre uses, and sites with good accessibility (within 800m of a main transport interchange).

## **POLICY DM32: Retail Proposals Outside Defined Centres**

**Retail proposals for more than 200 sq. m net floorspace in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable under the terms of the National Planning Policy Framework (NPPF), particularly in terms of:**

- a. the appropriate scale of development;**
- b. the sequential approach;**
- c. avoiding significant adverse impact on existing Defined Centres, including any cumulative impact; and**
- d. accessibility by a choice of means of transport.**

**Assessment of the retail impact of proposed development on the Central Shopping Area will only be required where the retail floorspace proposed exceeds 525 sq. m net.**

9.32.1 Defined Centres in Ipswich consist of the Central Shopping Area, District Centres and Local Centres. The town centre is not a defined centre for the purposes of this policy.

9.32.2 Out of town retail parks, sole retail warehouses and large foodstores (such as supermarket and superstores) are not defined as centres and therefore policy DM31 should apply to proposals within these locations. Retail warehouses are large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of bulky goods, generally selling goods that would require transportation by car.

9.32.3 Listed below are items which the Council considers to be bulky goods:

- domestic household electrical;
- audio-visual equipment (including radio, TV, Hi-Fi, and computer goods);
- furniture, lighting, carpets and floor covering;
- hardware and DIY goods;
- garden centre goods and garden furniture;
- builders merchants;
- automotive products and accessories together with associated fitting;
- caravans boats and boat equipment;
- cycles, cycle products and accessories;
- camping equipment;
- pets and pet supplies;
- furnishing fabrics and curtains; and
- blinds and poles.

Items such as clothing, footwear and food are not considered to be bulky goods.

9.32.4 The National Planning Practice Guidance states that conditions may be attached to appropriately control the impact of retail uses. Conditions may therefore be attached, including the following:

- to prevent developments from being sub-divided into a number of smaller shops or units;
- to ensure that ancillary elements remain ancillary to the main development, by allowing up to 10% or 200 sq. m of net floorspace (whichever is the smaller) to be devoted to ancillary and incidental goods taken together;

- to limit any internal alterations to increase the amount of gross floor space by specifying the maximum retail floor space permitted; and
- to limit the range of goods sold, and control the mix of convenience and comparison goods.

9.32.5 This policy applies to retail proposals which are defined as those uses falling within Use Classes A1 (Shops), A2 (Financial and Professional Services) and A5 (Hot Food Takeaways) only. Use Classes A3 (Restaurants and Cafes) and A4 (Drinking Establishments) are classified as leisure within the NPPF definition of main town centre uses and therefore this policy does not apply to these uses. It is important to distinguish between these use classes as it affects the application of the sequential test, as set out in the NPPF.

9.32.6 Policy DM32 applies to proposals which give rise to more than 200 sq.m net floorspace, either from a single unit or the aggregation of units within the proposed development. Retail proposals that are over 525 sq. m net will be required to undertake an impact assessment on all Defined Centres (including the Central Shopping Area) in the catchment area. Retail proposals that are over 200 sq. m net will be required to undertake an impact assessment on District and Local Centres in the catchment area. All impact assessments will need to consider the impact of the proposal on existing, committed and planned public and private investment in Defined Centres in the catchment area of the proposal, taking account of cumulative impact. The impact assessment should consider the impact of the proposal on the vitality and viability of Defined Centres.

9.32.7 The Retail and Commercial Leisure Study 2017, indicates that there is no need or justification for further major out-of-town retailing in Ipswich.

9.32.8 The sequential approach to the consideration of retail proposals will be applied as follows:

- firstly, to consider whether there are sites available in the Primary Shopping Area, comprising Primary and Secondary Shopping Frontage Zones and in the District and Local Centres only where the scale of the proposed development is appropriate to the catchment areas the centres serve;
- secondly, to consider sites in edge of centre locations as defined in the NPPF; and
- thirdly, to consider sites in out of centre locations.

## **POLICY DM33: Protection of Employment Land**

The Employment Areas are defined on the policies map and the IP-One Area inset policies map and listed below:

1. Ipswich Business Park, north of Whitton Lane;
2. White House Industrial Estate, White House Road;
3. Knightsdale Road / Wharfedale Road;
4. Boss Hall Industrial Estate;
5. Hadleigh Road Industrial Estate, including Elton Park;
6. Land south of London Road / east of Scrivener Drive;
7. Civic Drive / Princes Street / Russell Road / Portman Road;
8. Felaw maltings / IP-City Centre;
9. Riverside Industrial Park and the West Bank area;
10. Cavendish Street;
11. Holywells Close and Holywells Road;
12. Cliff Quay/Sandy Hill Lane / Greenwich Business Park / Landseer Road area;
13. Wright Road / Cobham Road;
14. The Drift / Leslie Road / Nacton Road;
15. Ransomes Europark;
16. Airport Farm Kennels, south of Ravenswood; and
17. Futura Park, Nacton Road

The defined Employment Areas will be safeguarded for employment and ancillary uses.

Employment uses are defined as:

- i. B1 Business, B2 General Industry or B8 Storage and Distribution, as defined by the Use Classes Order 1987 (as amended), with a town centre first approach to the location of offices; and
- ii. appropriate employment-generating sui generis uses.

Small scale services specifically provided for the benefit of businesses based, or workers employed, within the Employment Area will also be permitted where:

- a. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; and
- b. the proposed use is compatible with the surrounding uses.

Outside the defined Employment Areas, the conversion, change of use or redevelopment of sites and premises in employment use to non-employment uses will only be permitted where:

- c. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; or
- d. the proposed use is residential and it can be acceptably accommodated, would make more effective use of the site and would not harm the economic development strategy of the plan; and
- e. in relation to c. and d., the proposed use is compatible with the surrounding uses and is an appropriate use for the site.

9.33.1 The established Employment Areas across the Borough represent very significant clusters of employers providing jobs and therefore need to be safeguarded. The jobs growth

target set out in policy CS13 means that protecting against the loss of employment areas is important. Protecting employment areas for employment use also retains choice of locations across the Borough for businesses to locate in. As consolidated employment areas, operational requirements such as 24 hour working or heavy goods access are also more likely to be capable of being met without adversely affecting the amenity of residential areas. Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.

- 9.33.2 The loss of employment land, whether in existing employment use or within a defined Employment Area, could affect the Council's ability to achieve its employment objectives and job targets. Land and buildings in employment use may also come under pressure from other forms of development that tend to have higher values such as retail, leisure and housing. As a general principle therefore, such land needs to be protected.
- 9.33.3 Retail uses will not be permitted other than as small scale retailing ancillary to the main B class use. Ancillary uses are defined in terms of size of floorspace and there being a functional relationship with the main B class use. Ancillary retailing should be less than 10% of the floorspace or 200 sq. m net, whichever is the smaller.
- 9.33.4 To demonstrate no reasonable prospect of re-use for employment purposes over the plan period in accordance with the policy, applicants will be required to produce evidence that the site has been marketed actively for a continuous period of at least twelve months from the date of the first advertisement for employment uses as appropriate to the site. Further information on the marketing requirement are set out in appendix 6.
- 9.33.5 Ipswich Port plays a significant role in the Ipswich economy, handling over 3 million tonnes of cargo a year. The extended West Bank handles primarily unitised cargo whereas the East Bank caters for bulk cargoes. Transport, freight and logistics have been identified by the New Anglia Local Enterprise Partnership as one of the key sectors which will drive the growth of the region in coming years. The Suffolk Growth Strategy 2013 also identifies that UK container traffic is likely to grow steadily over the next 15 years, as will opportunities arising through diversifying bulk-breaking and post-processing capabilities.
- 9.33.6 Within Ipswich Port a number of consents exist under the Planning (Hazardous Substances) Act 1990 and the Dangerous Substances in Harbour Areas Regulations 1987. These consents and licences permit the handling and storage of hazardous substances. This will need to be taken into account in any development planned in the vicinity of these areas.
- 9.33.7 References to employment uses in this policy and reasoned justification exclude retail uses. Appropriate employment-generating sui generis uses referred to in the policy include uses such as car showrooms with accompanying workshops and waste facilities and excludes any sui generis use which includes retail or leisure as anything other than an ancillary use. Small scale services could include small gyms or cafes (use classes D2 or A3) providing facilities targeted at people working in the area. All uses, whether temporary or permanent, will be expected to provide appropriate facilities on the site for employees.
- 9.33.8 The Council recognises the importance of retaining existing employment uses and allowing for their growth and development where this can be accomplished without giving rise to serious environmental problems or unacceptable increases in traffic. Where employment uses are no longer appropriate to their surroundings or cannot reasonably expand further on their existing sites they will be encouraged to relocate within Employment Areas.

**POLICY DM34**  
**Delivery and expansion of**  
**Digital Communications Networks**

The Council recognises the importance of high quality and reliable communications in the delivery of a vibrant local economy and for the contribution they can make to the environment by reducing the need to travel.

- a. **On sites of more than 10 new residential units and on other non-residential development, proposals must allow for the provision of the infrastructure for the most up to date digital communications technology in order to allow connection to that network. This infrastructure should be provided on an open access basis that will allow for the future provision of “ultrafast broadband”, “Full fibre” solutions or any other technology as and when they are made available.**
- b. **Proposals for the expansion of electronic communications networks, including next generation mobile technology (such as 5G) will be supported, where they preserve the historic environment and do not harm the appearance of the street scene.**

9.34.1 The Council is committed to securing a high-quality communication infrastructure. The lack of such infrastructure would potentially hold back on the Borough’s competitiveness and economic well-being. The installation of digital infrastructure can also help to mitigate air quality impacts by reducing the need to travel through initiatives such as home working. Developers for all new sites (residential and non-residential) should engage with broadband providers to ensure that communications network infrastructure, capable of delivering at least superfast broadband, is installed as part of the build process. New properties should be provided with the internal infrastructure to ensure that they can be connected to the broadband communication network or the most up to date technology. The broadband should be installed on an open access basis allowing for use by a number of internet service providers, and cables should be threaded through resistant ducting to enable easy access to the fibre optic cable for future repair, replacement or upgrading.

# Part D: Implementation, Targets, Monitoring and Review

# CHAPTER 10: Implementation

10.1 A key element of the Core Strategy, as well as the Local Plan in general, is the need to set out clear mechanisms and targets for delivery. This chapter focuses on the implementation component of this, with Chapter 11 focusing on actual Plan targets and Chapter 12 on monitoring and review issues.

10.2 The rest of this chapter is set out in the following sections:

- Delivery Mechanisms; and
- Major Infrastructure Proposals.

## **Delivery Mechanisms**

10.4 The Council will work with the New Anglia Local Enterprise Partnership, Suffolk County Council, and Suffolk districts, particularly within the Ipswich Strategic Planning Area to deliver the employment and housing growth set out in this strategy. The Ipswich Strategic Policy Area Board, which comprises Councillors and Officers from the five Ipswich Strategic Planning Area authorities, was set up in 2007 to ensure the local authorities work together to deliver the vision for the Ipswich Strategic Planning Area. This Board continues to be an important delivery mechanism for the Ipswich Strategic Planning Area.

## **Major Infrastructure Proposals**

10.5 The Local Plan sits within the context of strategic infrastructure provision, which is currently coordinated via the New Anglia Local Enterprise Partnership. Strategic infrastructure needs are identified through a range of plans, strategies and organisations, including:

- LEP Norfolk and Suffolk Economic Strategy
- Suffolk Framework for Growth
- Suffolk Infrastructure Plan (SIP)
- Water Resources East
- Transport East
- Energy East

10.6 The levels of growth proposed within this document are substantial. Linked to these growth levels are identified needs for new infrastructure.

10.7 It is important that the Core Strategy identifies the major issues and sets out how these might be brought forward. Other infrastructure issues are addressed within the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.

10.8 Table 8A identifies the major pieces of infrastructure required to support growth. In addition, support is indicated elsewhere in the plan for other pieces of infrastructure, such as a Wet Dock Crossing. However these are not prerequisites for development to take place. As indicated in policy CS17, new development will need to meet its on- and off-site infrastructure needs through direct provision and/or section 106 contributions. The Recreational disturbance Avoidance and Mitigation Strategy (RAMS) referred to in policy CS17 is essential to support planned growth in the Borough, but is not included in table 8A as the measures proposed are not classed as infrastructure. For example, measures include site wardening. The RAMS Supplementary Planning Document sets out the charge levied to all new dwellings and the programme of measures.

10.9 Infrastructure requirements relating to the Ipswich Garden Suburb are listed in Table 8B.

10.10 The costs shown in Table 8A are indicative and may change. Costs may have been estimated on a per household or number of additional residents basis.

**TABLE 8A Major Infrastructure Proposals**

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Flood Management							
Ipswich Flood Defence Management Strategy  May include measures such as sheet piling renewal or a pumping station – to be confirmed by Environment Agency	Continued regeneration through mixed use developments within the Flood Risk zones in IP-One	Environment Agency	To be confirmed when the measures have been identified	tbc	tbc	Defra Environment Agency  Developer contributions	2036
Early years							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Additional early years capacity to meet demand arising from development in Alexandra Ward</p> <p>New setting at IP048</p> <p>Expansion of existing settings and investigate potential for new provision in town centre units</p>	Essential to support growth	Suffolk County Council	<p>£509,886</p> <p>£1,609,812 - £1,902,267</p>	<p>£509,886</p> <p>£1,609,812 - £1,902,267</p>	Unknown	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period
<p>Additional early years capacity to meet demand arising from development in Bridge Ward</p> <p>New setting at Halifax Primary School</p> <p>or</p> <p>Expansion of provision at Hillside Primary School</p>	Essential to support growth	Suffolk County Council	<p>£588,330</p> <p>or</p> <p>£414,900</p>	<p>£490,275</p> <p>or</p> <p>£414,900</p>	<p>£98,055</p> <p>or</p> <p>£0</p>	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Additional early years capacity to meet demand arising from development in Castle Hill, Whitehouse and Whitton Wards</p> <p>If possible, expand provision at Highfield Nursery and/or provide additional capacity at Ipswich Garden Suburb settings</p>	Essential to support growth	Suffolk County Council	£597,456 - £705,996	£597,456 - £705,996	£0	Suffolk County Council Developer contributions	Through-out plan period
<p>Additional early years capacity to meet demand arising from development in Gainsborough Ward</p> <p>Seek to expand provision at either Morland or Ravenswood Primary Schools</p>	Essential to support growth	Suffolk County Council	£149,364	£149,364	£0	Suffolk County Council Developer contributions	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Additional early years capacity to meet demand arising from development in Gipping Ward  New setting on development site	Essential to support growth	Suffolk County Council	£1,176,660	£1,000,161	£176,499	Suffolk County Council  Developer contributions	Through-out plan period
Additional early years capacity to meet demand arising from development in Holywells Ward  New setting at Rosehill Primary School  New setting at IP037 subject to sequential and exception test	Essential to support growth	Suffolk County Council	£2,353,320	£2,059,155	£294,165	Suffolk County Council  Developer contributions	Through-out plan period

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Additional early years capacity to meet demand arising from development in St John's Ward</p> <p>Expand provision at Britannia Primary School, or</p> <p>Establish a new setting at St John's Primary School</p>	Essential to support growth	Suffolk County Council	<p>£331,920</p> <p>Or</p> <p>£588,330</p>	<p>£331,920</p> <p>Or</p> <p>£392,220</p>	Unknown	<p>Suffolk County Council</p> <p>Developer contributions</p>	Through-out plan period
Primary education							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (£106)	Potential funding gap	Potential funding sources	Time-scale
Primary School Provision New school at IP048a Mint Quarter Extensions to existing schools: <ul style="list-style-type: none"> <li>• Rosehill Primary School</li> <li>• St Mark's or Sprites Primary School</li> </ul>	Essential for the delivery of residential development across Ipswich including at the Waterfront	Suffolk County Council / Dept. for Education	£8,236,620	£3,824,145 (based on 195 pupils)	£4,415,175	Suffolk County Council Dept. for Education Developer Contributions	Through-out plan period
			£1,742,580	£564,264	£1,178,316		
			£1,742,580 - £3,485,160	£4,729,860	£0		
Secondary education							
Secondary School expansion Chantry Academy – 300 places by 2036 (22% of demand is arising within Ipswich Borough) Stoke High School – 190 places by 2036 (48% of demand is from planned growth and remainder is background growth)	Essential for the delivery of residential development across Ipswich including at the Waterfront and in Babergh Mid Suffolk District(s)	Suffolk County Council	£6,821,400	£2,046,420	£4,774,980	Suffolk County Council Dept. for Education Developer Contributions from Babergh Mid Suffolk and Ipswich	Through-out plan period
			£4,320,220	£2,516,010	£1,804,210		

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Post-16 education							
Expansion of Suffolk One <sup>9</sup>	Essential to support growth	Suffolk County Council	£9,095,200	£7,799,134	£1,296,066	Suffolk County Council Dept. for Education Developer contributions	Through-out plan period
Waste provision							
Relocation of Portman's Walk Household Waste Recycling Centre (HWRC) Expansion of Foxhall HWRC	Essential to support growth	Suffolk County Council	£3m	£110 per dwelling	£0	Suffolk County Council Developer contributions	Through-out plan period
Libraries							

<sup>9</sup> It is not currently considered necessary to establish a new Sixth Form to serve Ipswich, but this will be reconsidered through the next plan review. If further capacity were required, the establishment of a new Sixth Form serving one or both of Ormiston Endeavour and the new Ipswich Garden Suburb secondary could be considered along with other options

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (S106)	Potential funding gap	Potential funding sources	Time-scale
Expansion of existing libraries, remodelling of existing libraries or provision of flexible, digital access and/or mobile services.  Strategy and distribution of improvements to be developed during the plan period	Essential to support growth	Suffolk County Council	£700,000 <sup>10</sup>	£216 per dwelling	£0	Suffolk County Council  Developer contributions	Through-out plan period
Transport							
A14 Junction improvements Junction 55 Copdock Junction 56 Wherstead Junction 57 Nacton Junction 58 Seven Hills	Essential to support ISPA-wide growth	Suffolk County Council  Highways England	£65m-£100m  £5m-£10m £5m-£10m £5m	Unknown	Unknown	Developer contributions (S278/S106) from all the ISPA authorities  Highways England (RIS or Minor Works Fund)  Central Government	Through-out plan period
Measures to increase capacity on A1214	Essential to support ISPA-wide growth	Suffolk County Council  Highways England	£4m	Unknown	Unknown	Developer contributions from all the ISPA authorities	Through-out plan period

<sup>10</sup> Approximately based on the number of dwellings from policy ISPA4 and SP2 housing allocations.

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Sustainable transport measures in Ipswich, including Smarter Choices, Quality Bus Partnership and other measures	Essential to support ISPA-wide growth	Suffolk County Council	£7.3m-£8.4m to 2026	Tbc through action plan	Tbc through action plan	Developer contributions from all the ISPA authorities Suffolk County Council ISPA authorities	Through-out plan period
Infrastructure improvements to support sustainable transport measures and junction improvements	Essential to support ISPA-wide growth	Suffolk County Council	£16m-£20m to 2026	Tbc through action plan	Tbc through action plan	Developer contributions from all the ISPA authorities Suffolk County Council ISPA authorities	Through-out plan period
Link road through site IP029 via Europa Way from Bramford Road to Sproughton Road)	Desirable but not essential to support planned growth	Suffolk County Council	Tbc	tbc	tbc	Suffolk County Council Developer contributions	Through-out plan period
Wet Dock Crossing	Desirable but not essential to support planned growth	Suffolk County Council	Tbc	tbc	tbc	Suffolk County Council Developer contributions	Through-out plan period
Green infrastructure							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
Green infrastructure: - green trail around Ipswich  - country park at Ipswich Garden Suburb (see Table 8B)  Expansion of Orwell Country Park	Essential to support growth	Developers  Suffolk County Council  Ipswich Borough Council	tbc	tbc	tbc	Developer contributions and direct provision  Housing Infrastructure Fund  Ipswich Borough Council	Through-out plan period
Utilities							
New primary substation at Turret Lane	Development in the town centre in support of urban regeneration	UK Power Networks	tbc	tbc	tbc	UK Power Networks	Need and delivery still under investigation
Water supply - site connections to the existing network (may include network upgrades)  Foul sewerage network - site connections to the existing network (may include network upgrades)	Essential to support growth	Anglian Water Services Ltd	tbc	tbc	tbc	Anglian Water  Developer contributions	Throughout plan period
Sport & leisure facilities							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>New sports, leisure and recreation facilities – will be identified through IBC review of sports provision:</p> <p>Rights of Way Improvement Plan</p> <p>Ravenswood Sports Park IP150b</p> <p>Relocation of King George V Playing Fields IP032</p>	<p>Supporting growth, enhancing health and quality of life, and supporting greener lifestyles and green transport</p>	<p>Ipswich Borough Council</p> <p>Developers</p> <p>Highway Authority for Rights of Way Improvement Plan</p>	tbc	tbc	tbc	<p>Developer contributions</p> <p>Ipswich Borough Council</p> <p>Housing Infrastructure Fund</p> <p>Suffolk County Council</p>	<p>Need and delivery still under investigation</p>
Healthcare provision							

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Approx. Cost	Potential developer contribution (\$106)	Potential funding gap	Potential funding sources	Time-scale
<p>Health centre at IP005 Former Tooks Bakery</p> <p>Healthcare provision enhancements – to be identified in conjunction with schemes coming forward</p>	Essential to support growth	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group</p> <p>East Suffolk and North Essex NHS Foundation Trust</p>	tbc	tbc	tbc	<p>Dept. for Health</p> <p>NHS England</p> <p>East Suffolk and North Essex NHS Foundation Trust</p> <p>Ipswich &amp; East Suffolk Clinical Commissioning Group</p> <p>Developer contributions</p>	Through-out plan period

10.11 Policy CS10 Ipswich Garden Suburb states that the detailed strategic and neighbourhood infrastructure requirements for the Garden Suburb development of approximately 3,500 dwellings are included in Table 8B below. Table 8B sets out those requirements, starting with the strategic infrastructure requirements for the whole Ipswich Garden Suburb area and then identifying the detailed neighbourhood infrastructure for each of the three neighbourhoods in turn.

**TABLE 8B Strategic and Neighbourhood Infrastructure Requirements for the Ipswich Garden Suburb (formerly Northern Fringe) (see policy CS10 Ipswich Garden Suburb)**

Infrastructure theme	Infrastructure
<b>Strategic Infrastructure</b>	
<b>Access &amp; transport</b>	Off-site junction improvements in surrounding road network
	Connection to the Urban Traffic Management and Control (UTMC) system
	Vehicular rail crossing with road access connecting housing in Fonnereau and Henley Gate neighbourhoods and the District Centre in the Fonnereau neighbourhood.
	Fonnereau Way cycle / pedestrian bridge across rail line.
	Phased delivery of bus services & bus priority measures.
	Improvements to strategic town centre & east-west footpaths / cycleways.
	Improvements to Westerfield Station and level crossing.
	Controlled cycle / pedestrian crossing on Westerfield Road.
	Traffic management scheme for Westerfield village, The Crofts and other locations.

<b>Education</b>	1200 space secondary school (including sixth form facility) with site providing playing fields and recreational facilities that would be secured for use by the community.
<b>Open space, recreation &amp; play</b>	Country Park with visitor / community centre (with potential for dual community centre use) for Henley Gate.
	Swimming contribution (off-site)
<b>Community facilities</b>	District & Local Centres including community buildings with integrated library facilities & police office (where required) alongside new healthcare provision & reserved sites for community use.
	Funding for community development support officer(s).
<b>Utilities</b>	Any strategic improvements to electricity & gas supply.
	Any strategic improvements to water supply.
	Any strategic improvements to sewerage system.
	Any strategic infrastructure needed to deliver low carbon development.
	Strategic SuDS infrastructure & connections.
<b>Infrastructure theme</b>	<b>Infrastructure</b>
<b>Neighbourhood Infrastructure – Fonnereau Neighbourhood</b>	
<b>Access &amp; transport</b>	Travel Plan development, implementation & monitoring.
	Improvements to Fonnereau Way (complete section linking Valley Road & railway line).
	Pedestrian and cycle signage (monoliths).

<b>Education &amp; early years</b>	2FE (form of entry) primary school & nursery with the potential for some facilities to be shared with the community.
<b>Open space, recreation &amp; play</b>	Neighbourhood parks, allotments & open spaces with equipped sports & play facilities as per Core Strategy Policy.
<b>Community infrastructure</b>	District Centre supporting infrastructure (CCTV, electric charging points, recycling facility, cycle parking etc. as detailed in agreed infrastructure framework.
	Community centre in District Centre with integrated library facilities, workspace hub and police office (where required by Suffolk Constabulary).
	Healthcare provision.
<b>Other items</b>	Household waste facilities (sum).
	Superfast broadband infrastructure.
<b>Infrastructure theme</b>	<b>Infrastructure</b>
<b>Neighbourhood Infrastructure – Henley Gate Neighbourhood</b>	
<b>Access &amp; transport</b>	Travel Plan development, implementation & monitoring.
	Improvements to Fonnereau Way (complete section linking railway line and Lower Road).
	Pedestrian and cycle signage (monoliths).
<b>Education &amp; early years</b>	2FE (forms of entry) primary school & nursery with the potential for some facilities to be shared with the community.

<b>Open space, recreation &amp; play</b>	Neighbourhood parks, allotments & open spaces with equipped sport & play facilities as per Core Strategy policy.
<b>Community infrastructure</b>	Local Centre supporting infrastructure (CCTV, electric charging points, recycling facility, cycle parking etc. as detailed in agreed infrastructure framework).
	Community centre (may include workspace hub).
<b>Other items</b>	Household waste facilities (sum).
	Superfast broadband infrastructure.
<b>Infrastructure theme</b>	<b>Infrastructure</b>
<b>Neighbourhood Infrastructure – Red House Neighbourhood</b>	
<b>Access &amp; transport</b>	Travel Plan development, implementation & monitoring.
	Pedestrian & cycle signage (monoliths).
<b>Education &amp; early years</b>	2FE (forms of entry) primary school & nursery with the potential for some facilities to be shared with the community.
<b>Open space, recreation &amp; play</b>	Neighbourhood parks, allotments & open spaces with equipped play & sports facilities as per Core Strategy Policy.
<b>Community infrastructure</b>	Local Centre supporting infrastructure (CCTV, electric charging points, recycling facility, cycle parking etc. as detailed in agreed infrastructure framework).
<b>Other items</b>	Household waste facilities (sum).

	Superfast broadband infrastructure.
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# CHAPTER 11: Key Targets associated with Part B

- 11.1 The Council recognises that it is important to have a limited number of measurable targets against which the delivery of the Local Plan can be assessed.
- 11.2 Where possible the Council would prefer to monitor its Local Plan using established indicators that are already being measured, rather than new indicators it would need to create.
- 11.3 It is suggested that indicators should focus on measuring performance against the objectives set out in Chapter 6. The indicators set out below relate to the objectives in this document.
- 11.4 It is also recognised that further work is required to establish baseline data in many instances.
- 11.5 The twelve objectives of Chapter 6 are set out below along with suggested indicators and targets, or recognising where indicators and targets need to be developed.

### **OBJECTIVE 1: STRATEGIC WORKING**

**To work with other local authorities in the Ipswich Strategic Planning Area and with community partners to ensure a coordinated approach to planning and development.**

#### INDICATOR(S)

Joint working taking place through the ISPA Board (or other equivalent forum)

#### TARGETS

To achieve effective cross boundary working on strategic matters.

### **OBJECTIVE 2: GROWTH**

**At least (a) 8,010 new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2018 and 2036 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 9,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Strategic Planning Area between 2018 and 2036.**

#### INDICATOR(S)

Net additional homes provided in the monitoring year.

Number of affordable homes provided in the monitoring year.

Net annual housing and employment land completions

Employment rates

#### TARGETS

To deliver at least(a) 8,010 homes by 2036 and approximately (b) 9,5000 jobs by 2036.

### **OBJECTIVE 3: THE DISTRIBUTION OF DEVELOPMENT**

**The development of the Borough should be focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb, the Northern end of Humber Doucy Lane and within and adjacent to identified district centres (these areas are identified on the key diagram).**

#### INDICATOR(S)

- Density of residential development taking place in IP-One.
- Percentage of major schemes in IP-One consisting of a mix of uses.
- Progress at Ipswich Garden Suburb and Humber Doucy Lane.
- Proportion of new dwellings provided on previously developed land.

#### TARGETS

Over the plan period, 75% of major developments to take place in IP-One, Ipswich Garden Suburb, Humber Doucy Lane and District Centres or within 800m of District Centres.

#### **OBJECTIVE 4: SUSTAINABLE DEVELOPMENT**

**Development must be sustainable, environmentally friendly and resilient to the effects of climate change.**

#### INDICATOR(S)

- Proportion of dwellings granted planning permission that achieve Building for Life 12
- Development brought forward on previously developed land.
- Number of schemes incorporating attenuation and infiltration SUDs.
- Flood and coastal erosion risk management.

#### TARGETS

Securing schemes of high quality design which enhance the environment and minimise flooding.

#### **OBJECTIVE 5: AIR QUALITY**

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

#### INDICATOR(S)

- Per Capita CO2 emissions in the local authority area.
- Local authority CO2 emissions.
- Local authority air pollution data.
- Number of designated AQMAs.

#### TARGETS

To reduce the level of identified air pollutants in the National Air Quality Strategy.  
To reduce Ipswich's estimated carbon footprint from the 2004 base level (CRed)

## **OBJECTIVE 6: TRANSPORT AND CONNECTIVITY**

**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 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, integrated cycle routes should be provided; and**
- **Ipswich Borough Council aspires to an enhanced public transport system.**

### **INDICATOR(S)**

Number of travel plans agreed for new developments.

Travel to work distances and travel to work modes.

### **TARGETS**

Increase the proportion of journeys undertaken by sustainable modes.

## **OBJECTIVE 7: RETAIL AND CULTURAL OFFER**

**To enhance the vitality and viability of the town centre and district centres in response to changing consumer habits.**

### **INDICATOR(S)**

Net additional retail floor space in the Central Shopping Area and outside

Number of tourism events in the town centre.

Visitors to the Regent Theatre and Corn Exchange.

Public realm improvements.

### **TARGETS**

To improve the town's cultural offer and to support the sustainable growth of the town's evening and night time economy.

To improve the retail rank of Ipswich by 2036.

To improve the prosperity of Ipswich's Local and District Centres.

## **OBJECTIVE 8: DESIGN AND HERITAGE**

**A high standard of design will be required in all developments. Development should conserve and enhance the historic environment of Ipswich, including historic buildings, archaeology and townscape.**

### INDICATOR(S)

Number of buildings on the Suffolk Buildings at Risk register.

Number of buildings and conservation areas on the Historic England Heritage at Risk register.

### TARGETS

To secure a high standard of design and reduce the number of Ipswich buildings at risk on the Suffolk Risk Register and Historic England Risk Register.

## **OBJECTIVE 9: NATURAL ENVIRONMENT**

**To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use.**

### INDICATOR(S)

Net change in extent of protected habitat.

Recorded condition of designated ecological sites.

Habitat mitigation secured.

Number of schemes complying with the biodiversity Defra metric

### TARGETS

Net gain of natural capital by 2036.

Habitat mitigation secured.

## **OBJECTIVE 10: COMMUNITY FACILITIES AND INFRASTRUCTURE**

**To retain and provide high quality and sustainable education schools, health facilities, and sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the local demand.**

### INDICATOR(S)

Ratio of Full Time Equivalent (FTE) Pupils to Full Time Qualified Teachers.

Educational attainment including GCSE and equivalent results for young people.

Percentage of new community facilities located in or within 800m of a centre.

### TARGETS

To improve educational attainment, health and wellbeing

## **OBJECTIVE 11: INEQUALITY**

**To tackle deprivation and inequalities across the town and create a safer more cohesive town.**

### INDICATOR(S)

Unemployment rates.

Educational attainment levels.

Proportion of the population who live in wards that rank within the most deprived 10% and 25% in the country

Reported crime in the Borough

### TARGETS

To improve Ipswich's rank in the indices of multiple deprivation by 2036 and reduce crime levels by 2036.

## **OBJECTIVE 12: DIGITAL INFRASTRUCTURE**

**To improve digital infrastructure provision.**

### INDICATOR(S)

Average Broadband speeds.

Proportion of residents with access to high speed and full fibre broadband.

### TARGETS

To ensure that digital infrastructure meets the needs of current and future generations.

## CHAPTER 12: Monitoring and Review

- 12.1 The Local Plan Authority Monitoring Report will review the progress of these arrangements as well as progress on delivering the major projects and infrastructure requirements outlined in Chapter 10, and performance against the targets set out in Chapter 11. Delivery of housing and jobs within the Ipswich Strategic Planning Area will be monitored through a joint monitoring process with other relevant authorities.
- 12.2 The Local Development Scheme states that the documents will be kept under regular review following their adoption.
- 12.3 In the context of this document it is likely that its review would link to significant new evidence becoming available, and issues being identified through the Authority Monitoring Report.

# Part E: Appendices

# APPENDIX 1

## A LIST OF POLICIES INCLUDED IN THIS DOCUMENT

### PART B: The Strategy

#### Strategic Spatial Approach

Policy ISPA1 Growth in the Ipswich Strategic Planning Area  
Policy ISPA2 Strategic Infrastructure Priorities  
Policy ISPA3 Cross-boundary Mitigation of Effects on Protected Habitats and Species  
Policy ISPA4 Cross-boundary Working to Deliver Sites

Policy CS1: Sustainable Development  
Policy CS2: The Location and Nature of Development  
Policy CS3: IP-One Area Action Plan  
Policy CS4: Protecting our Assets  
Policy CS5: Improving Accessibility  
Policy CS6: The Ipswich Policy Area (Policy deleted)

#### Live

Policy CS7: The Amount of New Housing Required  
Policy CS8: Housing Type and Tenure  
Policy CS10: Ipswich Garden Suburb  
Policy CS11: Gypsy and Traveller Accommodation  
Policy CS12: Affordable Housing

#### Work

Policy CS13: Planning for Jobs Growth  
Policy CS14: Retail Development and Main Town Centre Uses

#### Learn

Policy CS15: Education Provision

#### Play

Policy CS16: Green Infrastructure, Sport and Recreation

#### Infrastructure

Policy CS17: Delivering Infrastructure  
Policy CS18: Strategic Flood Defence  
Policy CS19: Provision of Health Services  
Policy CS20: Key Transport Proposals

## **PART C: Development Management Policies**

Policy DM1: Sustainable Construction  
Policy DM2: Decentralised Renewable or Low Carbon Energy  
Policy DM3: Air Quality (new)  
Policy DM4: Development and Flood Risk  
Policy DM5: Protection of Open Spaces, Sports and Recreation  
Policy DM6: Provision of New Open Spaces, Sports and Recreation Facilities  
Policy DM7: Provision of Private Outdoor Amenity Space in New and Existing Developments  
Policy DM8: The Natural Environment  
Policy DM9: Protection of Trees and Hedgerows  
Policy DM10: Green Corridors  
Policy DM11: Countryside  
Policy DM12: Design and Character  
Policy DM13: Built Heritage and Conservation  
Policy DM14: Archaeology (divided out)  
Policy DM15: Tall Buildings  
Policy DM16: Extensions to Dwellings and Provision of Ancillary Buildings  
Policy DM17: Small Scale Infill and Backland Residential Developments  
Policy DM18: Amenity  
Policy DM19: The Subdivision of Family Dwellings  
Policy DM20: Houses in Multiple Occupation  
Policy DM21: Transport and Access in New Developments  
Policy DM22: Car and Cycle Parking in New Development  
Policy DM23: The Density of Residential Development  
Policy DM24: Protection and Provision of Community Facilities  
Policy DM25: Shopfront Design (new)  
Policy DM26: Advertisement (new)  
Policy DM27: The Central Shopping Area  
Policy DM28: Arts, Culture and Tourism  
Policy DM29: The Evening and Night-time Economy (new)  
Policy DM30: District and Local Centres  
Policy DM31: Town Centre Uses Outside the Central Shopping Area  
Policy DM32 Retail Proposals Outside Defined Centres  
Policy DM33: Protection of Employment Land  
Policy DM34: Delivery and Expansion of Digital Communications Networks (new)

### **Deleted policies**

The following policies have been deleted and material incorporated into other policies as appropriate:

Buildings and Structures of Townscape Interest  
Non-residential Uses in Residential Areas

## APPENDIX 2

### COMMUNITY FACILITIES IN DISTRICT AND LOCAL CENTRES

The list below sets out some of the community facilities that the Council considers are appropriate in or within 400m straight-line distance of the District and Local Centres, provided certain criteria are met.

- Health Facilities including doctors surgeries and dentists;
- Education facilities including schools, nurseries, crèches and lifelong learning;
- Parks / open spaces and play facilities;
- Community meeting places or drop in centres;
- Libraries;
- Local service providers (e.g. local authority offices and police facilities);
- Places of Worship;
- Housing for people with special needs;
- Vets.

# APPENDIX 3

## ACTIVITIES OR SERVICES RELEVANT TO EACH PLANNING STANDARD CHARGE HEADING

The broad categories of infrastructure to be included in the standard charge are as follows. This does not constitute a precursor to a CIL Regulation 123 List.

### Highways and Transport

- Highway infrastructure
- Public Transport
- Transport/travel information
- Pedestrian/cycle routes including public rights of way
- Cycling facilities
- Parking
- Park and Ride
- Street Lighting
- Pedestrian facilities
- Street scene improvements
- Signing
- Traffic calming

### Childcare, Early Years and Education

- Nurseries and pre-school
- Schools
- Adult Education
- The University of Suffolk
- Suffolk New College

### Health and Emergency Services

- Health Facilities including acute and general healthcare requirements
- Social Care/Day care
- Public health and prevention
- Fire
- Ambulance
- Police

### Environment and Conservation

- Public Realm Improvements
- Waste Management
- Recycling
- Refuse collection and disposal
- Sustainable Urban Drainage Systems
- Flood Risk
- Flood defence
- Air Quality
- Archaeological Remains
- Historic Buildings
- Conservation Area Improvements
- Nature Conservation
- Historic Parks restoration

### Community and Cultural Facilities

- Safer Neighbourhood Teams and policing
- Street Lighting
- CCTV
- Libraries
- Cemeteries and crematoria
- Community Buildings

- Community Projects
- Youth facilities (not picked up under sport and recreation)
- Voluntary Sector Groups and Initiatives
- Places of worship
- Children's services
- Older people's services

### **Sport and Recreation**

- Parks and gardens
- Amenity greenspace
- Children's Play Space
- Facilities for young people
- Outdoor Playing Pitches
- Indoor Sports Facilities
- Outdoor Sports Facilities
- Allotments
- River Corridor and other green corridor Improvements
- Natural and semi natural greenspace including woodlands and country parks
- Civic spaces

### **Economic Development**

- Inward Investment
- Business support services
- Skills training

### **Utilities**

- Super-fast broadband
- Telephone
- Gas
- Electricity
- Water – potable and wastewater supply

# APPENDIX 4

## IPSWICH STANDARDS FOR THE PROVISION OF OPEN SPACE, SPORT AND RECREATION FACILITIES

TABLE 9

Typology of open spaces, sport & recreation facilities	Quantity Standard	Accessibility Standard
1. Parks & Gardens	1.16ha per 1000 popn	15 minute walk time
2. Amenity Green Space	0.48ha per 1000 popn	10 minute walk time
3. Natural and Semi Natural Green Space	1.53ha per 1000 popn	15 minute walk time
4. Outdoor Sports Facilities	1.42ha per 1000 popn	15 minute walk time
5. Provision for Children e.g. Local Areas of Play, Local Equipped Areas for Play and Neighbourhood Equipped Areas for Play – LEAPs, NEAPs and DEAPs.	0.08ha per 1000 popn	10 minute walk time
6. Provision for Young People e.g. teen shelters, multi-use games areas	0.04ha per 1000 popn	15 minute walk time
7. Allotments	0.41ha per 1000 popn Should also have reference to Council waiting lists to indicate demand	15 minute walk time
8. Cemeteries & Churchyards	Standard not appropriate	Standard not appropriate
9. Ecological networks	Standard not appropriate	Standard not appropriate
10. Civic Spaces	Standard not appropriate	Standard not appropriate
11. Water/ River based	Standard not appropriate	Standard not appropriate

For quality standards for types 1 to 9 above, please refer to the Ipswich Open Space, Sport & Recreation Study 2009 (reviewed in 2013, updated in 2017)

# APPENDIX 5

## GLOSSARY

Abbreviation	Term in full	Definition
	Active frontage	Ground floor building frontage that is in use, for example as a restaurant or shop.
	Adoption	The final confirmation of a plan as a statutory document by the local planning authority.
	Affordable Housing	Affordable housing includes affordable housing for rent and starter homes, discounted market sales housing and other affordable home ownership, provided to specified eligible households whose needs are not met by the market.
	Amenity	Pleasantness of a place or circumstance. For planning purposes residential amenity is usually taken to include attributes such as privacy, access to daylight and sunlight, and absence of noise pollution. It does not include property values.
AMR	Annual Authority Monitoring Report	Reports progress with preparing the Local Plan and the extent to which policies are being achieved.
AA	Appropriate Assessment	An appropriate assessment, also known as a habitat regulations assessment, is the process of considering emerging policies against the habitats directive.
AAP	Area Action Plan	A type of development plan document relating to specific areas of major opportunity and change or conservation.
	Area of Archaeological Importance	The Area of Archaeological Importance is a defined area where there is suggested to be significant known or a high potential for complex and sensitive archaeological deposits. It is based upon available evidence of buried archaeology, historic maps and information, standing structures and visual elements of the historic landscape. Within the local plan context, it is intended to alert applicants and planning officers to the likely requirements for archaeological investigation, protection and recording to be placed on development, on potentially even the smallest scale below-ground works.
AONB	Area of Outstanding Natural Beauty	A site with a statutory national landscape designation to provide special protection for the area's natural beauty. Designated by Natural England, the primary objective is to conserve the natural beauty of the landscape.
AQMA	Air Quality Management Areas	Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
	Ancient or veteran trees	A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.
	Biodiversity	The variety of life on earth or in a specified region or area.
BAP	Biodiversity Action Plan	It is the UK Government's response to signing the Convention on Biological Diversity (CBD) at the 1992 Rio Earth Summit. The plan sets out a programme for conserving the UK's biodiversity, at national and local levels. The Suffolk Local Biodiversity Action Plan (Suffolk LBAP) is applicable for the county of Suffolk.
	Biodiversity Net Gain	The National Planning Policy Framework encourages net gains for biodiversity to be sought through planning policies and decisions. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. It may help local authorities to meet their duty under Section 40 of the Natural Environment and Rural Communities Act 2006.
	Blue Corridors	Such as rivers and other waterbodies. These routes may be used for swimming, canoeing and other water-based activities, whether for leisure purposes or travel, and provide opportunities for wildlife migration and movement.
BfL 12	Building for Life 12	Building for life is a partnership between several national agencies, which sets standard for well-designed homes and neighbourhoods. It is led by CABI at the Design Council, Design for Homes and the Home Builders Federation.
BREEAM	Building Research Establishment Environmental Assessment Method	It is a tool that allows the owners, users and designers of buildings to review and improve environmental performance throughout the life of a building.
BID	Business Improvement District	It is a public-private partnership in which businesses in a defined area elect to pay an additional tax in order to fund improvements to the district's public realm and trading environment. In Ipswich the BID is called Ipswich Central.
	Brownfield sites	Development site on previously developed land.
	Brownfield Land Register	Registers of previously developed land considered to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017.

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
CRed	Carbon Reduction	Community Carbon Reduction Project is based in the East of England and is addressing the biggest environmental challenge of Climate Change. CRed is building a community of partners who are deciding how they want to cut their emissions of carbon dioxide (CO2) to meet a target of 60% reduction by 2025.
	Circular	A Government publication setting out policy approaches.
CABE	Commission for Architecture and the Built Environment	CABE was until 31 <sup>st</sup> March 2011 a statutory body sponsored by the Government. On 1 <sup>st</sup> April 2011 it was merged with the Design Council, to become an advisor on design in business innovation and the built environment.
CIL	Community Infrastructure Levy	Local authorities will be empowered to set a charge for most developments, through a simple formula related to the scale and type of scheme. The proceeds of the levy must be spent on local and sub-regional infrastructure to support the development of the area.
	Community Strategy	Strategy for promoting the economic, environmental and social well-being of the area and contributing to the achievement of Borough wide sustainable development.
	Comparison shopping	Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
	Convenience shopping	Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.
	Conservation Area	Defined areas within a local planning authority that are considered to be of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Conservation area designation introduces a general control over the demolition of unlisted buildings and provides a basis for the conservation of those aspects of character or appearance (including landscape and public spaces) that define the area's special interest. That special character could include elements such as the historic layout of roads, paths and boundaries and characteristic building and paving materials. All the features within the area, listed or otherwise, are recognised as part of its character. Conservation areas are identified in the National Planning Policy Framework as designated heritage assets.
	Curtilage	It is the enclosed area of land around a dwelling. It is distinct from the dwelling by virtue of lacking a roof, but distinct from the area outside the enclosure in that it is enclosed within a wall or barrier of some sort.

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
	Density Residential Development	of High density refers to new housing development of at least 90 dwellings per hectare (dph). Medium density refers to new housing development of at least 40 dph (the average will be taken as 45 dph). Low density refers to new housing development under 40 dph (the average will be taken as 35 dph).
	Development brief	Document providing detailed information to guide developers on the type of development, design and layout constraints and other requirements for a particular, usually substantial, site.
	Development Plan	Documents setting out the policies and proposals for the development and use of land and buildings.
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.
DEAP	Destination Equipped Area for Play	Provides a wide range of play equipment, including 'water play', and as such tends to draw people from a wide catchment area.
	Digital Infrastructure	The entire spectrum of network, computer, and storage functions required for the successful delivery of applications and services in a mobile, digital economy.
	Edge of Centre	For retail purposes it is a location that is well connected to and within easy walking distance (up to 300 metres) of the primary shopping area.  For all other town centre uses, it is likely to be within 300m of a town centre boundary.  For office uses, it may also mean outside the town centre but within 500m of a public transport interchange, within the urban area.
	European Sites	This includes Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended).
	Geodiversity	The variety of rocks, fossils, minerals, landforms and soils along with the natural processes that shape the landscape.
	Green Corridors	Such as river and canal banks, cycle ways, and rights of way. These linear routes may be used for walking, cycling or horse riding, whether for leisure purposes or travel, and provide opportunities for wildlife migration and movement.
	Green Infrastructure	Sub regional network of protected sites, nature reserves, green spaces and greenway linkages, including

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
		river corridors and flood plains, migration routes and features of the landscape, which are important as wildlife corridors.
	Green roof	The term to describe both intensive ornamental roof gardens and extensive roofs with more naturalistic plantings or self-established vegetation, which can provide a habitat for biodiversity.
	Greenways Project	Countryside Management Project for Ipswich and the surrounding area.
	Gypsies and Travellers	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. In determining whether persons are 'gypsies and travellers' for the purposes of policy CS11, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.
	Heritage Impact Assessment	An assessment of the impact upon the historic environment caused by a proposed development.
	Housing Market Area	A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.
	IP-One	Central part of Ipswich including the town centre, the Waterfront, Portman Quarter and the Education Quarter.
	Ipswich Standard	A standard applied to all housing owned by Ipswich Borough Council. It includes energy efficiency measures such as efficient combi boilers, double glazing and insulation.
	Key Diagram	The key diagram illustrates the spatial strategy set out in the DPD and may show links and relationships with other strategies and neighbouring authorities.
	Key Worker	The Government's definition of key workers includes those groups eligible for the Key Worker Living Programme and others employed within the public sector (ie outside of this programme) identified by the Regional Housing Board for assistance.
	Landmark Building	A building which is distinctive in its design and appearance which has the potential to improve

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
		wayfinding through its landmark quality. It should be noted that a landmark building need not necessarily be tall and/or overscaled. A careful, bespoke design respecting the scale of adjacent residential buildings could still provide a building of distinctive landmark quality
	Legibility	The extent to which a development or built up area can be navigated by both residents and visitors.
	Listed Building	A building or structure designated by the Secretary of State for the Department of Culture, Media, and Sport as being of special architectural or historical interest.
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.
LEP	Local Enterprise Partnership	A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.
LEAP	Local Equipped Area for Play	Characteristics include five types of equipment and a small games area.
LNR	Local Nature Reserve	Sites of special natural interest which are designated under the National parks and Access to the Countryside Act 1949.
LPA	Local Planning Authority	The Local Authority that is empowered by law to exercise planning functions. Normally this is the Borough or District Council.
LSP	Local Strategic Partnership	A local strategic partnership is a partnership of stakeholders who develop ways of involving local people in shaping the future of their neighbourhood in how services are provided. They are often single, multi-agency bodies, which aim to bring together locally the public, private, community and voluntary sectors.
	Mixed Use Development	A well integrated mix of land uses (retail, employment, leisure and other service uses) with decent homes of different types and tenures to support a range of household sizes, ages and incomes.
NPPF	National Planning Policy Framework	This document sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local and neighbourhood plans can be produced.
NEAP	Neighbourhood Equipped Area for Play	Characteristics include eight types of equipment and opportunities for ball games or wheeled activities.

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
	Non-designated Heritage Asset	A heritage asset that has not been included on any national list.
	Open space, sport and recreational facilities	These are shown in Table 9 of Appendix 4.
	Out of centre	In retailing terms, a location that is not in or on the edge of a centre but not necessarily outside the urban area.
	Objectively Assessed Need	An assessment of the amount of new housing, jobs, employment land, retail floorspace and other uses that are likely to be needed within the Borough.
	Passive House	A passive house (or Passivhaus) uses the principles of high levels of insulation, avoiding all cold bridging, very good air tightness, and maximising solar gains in an attempt to reduce annual heat demands so that mechanical ventilation and heat recovery systems can be utilised for heating homes, rather than conventional heating systems, which can be omitted.
	Place shaping	'Place shaping' is the name the government gives to the role that local authorities have in leading their communities, creating prosperity and fostering local identity and civic pride. It involves working with the local public, voluntary, community and private sectors to develop coordinated strategies to tackle the area's problems, needs and ambitions.
	Planning Application	An application for permission from the local planning authority to commence building work or change of use of buildings.
	Planning Permission	Approval required for the development of land from the local planning authority.
PPG	Planning Policy Guidance Note	Government documents providing policy and guidance on a range of planning issues such as housing, transport, conservation etc. PPGs were being replaced by Planning Policy Statements, which have now been replaced by the National Planning Policy Framework.
PPS	Planning Policy Statement	Government documents that were replacing PPGs and were designed to separate policy from wider guidance issues. These have replaced by the NPPF.
	Policies Map	An obligatory component of a local plan showing the location of proposals in the plan on an Ordnance Survey base map for new development plan documents. These were previously referred to as a Proposals Map
PDL	Previously Developed Land	It is land that is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
	Primary Zone	The Primary zone is a group of shops within the Primary Shopping Area which collectively form the core of the Central Shopping Area. This group is likely to include the highest proportion of retail uses.
	Primary Shopping Area	Defined area where retail development is concentrated, comprising the Primary and Secondary shopping zones.
	Proposals Map	An obligatory component of a local plan showing the location of proposals in the plan on an Ordnance Survey base map. The Ipswich Local Plan (1997) and the Core Strategy and Policies DPD (2011) both have a Proposals Map. The Government now refers to new Proposals Maps as Policies Maps.
	Public examination	The process by which an independent Planning Inspector publicly examines the soundness of a DPD and any representations made against it before issuing a report.
	Ramsar Site	Wetlands of global importance, listed under the Convention on Wetlands of International Importance (signed in Ramsar, Iran).
	Regeneration	Renewal, rehabilitation of former derelict or under used sites.
RIGS	Regionally important geological or geomorphological site	Sites identified for their geological or geomorphological interest according to certain criteria. They are protected through the statutory development plan.
	Registered Parks and Gardens	Gardens and other land considered to be of special historic interest and included on the Register of Parks and Gardens under the Historic Buildings and Ancient Monuments Act, 1953. The majority of sites registered are, or were originally, the grounds of private houses, but public parks and cemeteries are also important categories. Sites are graded I, II* or II along the same lines as listed buildings. The Register is held by Historic England and the List Entry details for all parks and gardens can be viewed online on the National Heritage List for England and appear on the Suffolk Historic Environment Record. Registered parks and gardens are identified in the National Planning Policy Framework as designated heritage assets.
	Retail Zones	A term given to areas within the Town Centre where shopping is the primary function. The number of shops is used to calculate the percentage of retail uses within the Core Strategy and Policies Review DPD. The exact extent of groups are defined in Appendix 7.

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
	Scheduled Monument	A nationally important historic building or archaeological site that is included in the Schedule of Monuments kept by the Secretary of State for Digital, Culture, Media and Sport and protected under the Ancient Monuments and Archaeological Areas Act 1979. Scheduled monuments are identified in the National Planning Policy Framework as designated heritage assets of the highest significance. The Schedule can be viewed online on the National Heritage List for England, physically inspected at the Historic England Archive in Swindon and appear on the Suffolk Historic Environment Record.
SMC	Scheduled Monument Consent	Monument Consent is a legal requirement under Ancient Monument and Archaeological Areas Act 1979 (as amended) for any works which might affect a monument either above or below ground level. It is granted by the Secretary of State for Digital, Culture, Media and Sport, on advice from Historic England, who administer the SMC application process on behalf of the SoS. The types of works that require SMC are specified under Section 2 of the 1979 Act. SMC is required regardless of whether or not planning permission is needed or has been obtained. It cannot be given retrospectively and undertaking works before consent has been given is a criminal offence. Metal detecting or geophysical survey on a scheduled monument is also illegal without a licence from Historic England.
	Secondary Zone	Secondary zones are groups of shops within a defined shopping centre (e.g. the Central Shopping Area) where there is more opportunity for a diversity of uses than in the primary zone.
	Self-build and Custom-build Housing	Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.
SSSI	Site of Special Scientific Interest	An area of land which, in the opinion of Natural England, is of special interest at a national level due to its flora, fauna or geological or physiographical features.
	Soundness	Soundness means founded on a robust and credible evidence base and the most appropriate strategy when considered against the reasonable alternatives. For something to be sound is must also be deliverable, flexible and able to be monitored.
	Spatial Planning	Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
		and how they function. This will include policies which can impact on land use, for example, by influencing the demands on or needs for development, but which are not capable of being delivered solely or mainly through the granting of planning permission and may be delivered through other means. (PPS 1 ODPM, 2004, pp3).
SAC	Special Area of Conservation	Sites of European importance for nature conservation designated under the Conservation of Natural Habitats and Wild Flora and Fauna Directive.
SPA	Special Protection Area	Sites of European importance for nature conservation designated under the Conservation of Wild Birds Directive.
	Specialist Zone	Specialist zones are groups of shops within a defined shopping centre (e.g. where there is the greatest diversity of uses, particularly including food and drink uses, alongside clusters of specialist retailers).
SCI	Statement of Community Involvement	A document which sets out the standards to be achieved in involving the community and other stakeholders in the preparation, alteration and review of local development documents and in significant development management decisions.
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.
SANGs	Suitable Alternative/ Accessible Natural Greenspaces	The name given to greenspace that is of a quality and type suitable to be used as mitigation to offset the impact of new development.
	Submission	The stage of preparation of a development plan document covered by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 It involves submitting a development plan document to the Secretary of State.
SPD	Supplementary Planning Document	A local development document that provides further detail of policies in the development plan documents or of saved local plan policies. They do not have development plan status.
SPG	Supplementary Planning Guidance	Providing additional guidance expanding policies in a local plan. SPGs will remain relevant where they are linked to saved policies but will ultimately be replaced by supplementary planning documents.

<b>Abbreviation</b>	<b>Term in full</b>	<b>Definition</b>
SuDS	Sustainable Drainage Systems	A sequence of management practices and control structures designed to drain water in a more sustainable manner than some conventional techniques. Typically these are used to attenuate and treat run-off from development sites.
SA	Sustainability Appraisal	Identifies and evaluates social, environmental and economic effects of strategies and policies in a local development document from the outset of the preparation process. It incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive.
	Sustainable Development	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
	Town Centre Uses	Town Centre uses are defined in the National Planning Policy Framework (NPPF) and include retail, leisure, entertainment, intensive sport and recreation, offices, arts, culture and tourism uses.
	Tests of Soundness	Statutory Local Development Documents are subject to an Examination in Public by an Inspector appointed by the Secretary of State. The purpose of the Examination is to assess whether the document is 'sound'. This means that those who wish to make a representation seeking a change to the document will need to show how that document is unsound and what needs to be done to make it sound. In order to assess this, the Inspector will assess the document against certain 'Tests of Soundness'. The purpose is to ensure that the whole plan is 'sound' in relation to all the legal and policy criteria it has to meet.
	Travel Plans	Travel Plans are long term management strategies for integrating proposals for sustainable travel into planning.
	Travelling Showpeople	Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above
	Urban fringe	Predominantly open land on the edge of an existing urban area.
	Use Classes Order	The Town and Country Planning (Use Classes) Order 1987 and subsequent amendments. Uses are defined as follows: A1 Shops A2 Financial and Professional Services A3 Restaurants and cafes

Abbreviation	Term in full	Definition
		A4 Drinking establishments
		A5 Hot food takeaways
		B1 Business (Offices (other than those that fall within A2), research and development of products and processes, light industry)
		B2 General industrial
		B8 Storage or distribution
		C1 Hotels
		C2 Residential Institutions
		C2A Secure Residential Institutions
		C3 Dwellinghouses
		C4 Houses in multiple occupation
		D1 Non-residential institutions
		D2 Assembly and Leisure
		Sui generis - uses not covered by the above including theatres, petrol filling stations, amusement centres, launderettes and taxi businesses.

## APPENDIX 6 MARKETING REQUIREMENTS

### 1. Introduction

- 1.1 This Strategy sets out the marketing exercise, which should be carried out prior to considering a change of use or redevelopment of a site in Ipswich.
- 1.2 The marketing approach would form a key part of any planning application for a change of use or redevelopment and ensure that the viability of the existing use has been fully considered.
- 1.3 This Strategy form a part of the Draft Ipswich Local Plan Review 2018 and is cross-referenced in polices DM24 (Protection and Provision of Community Facilities), DM29 (District and Local Centres) and DM33 (Protection of Employment Land).

### 2. The Strategy

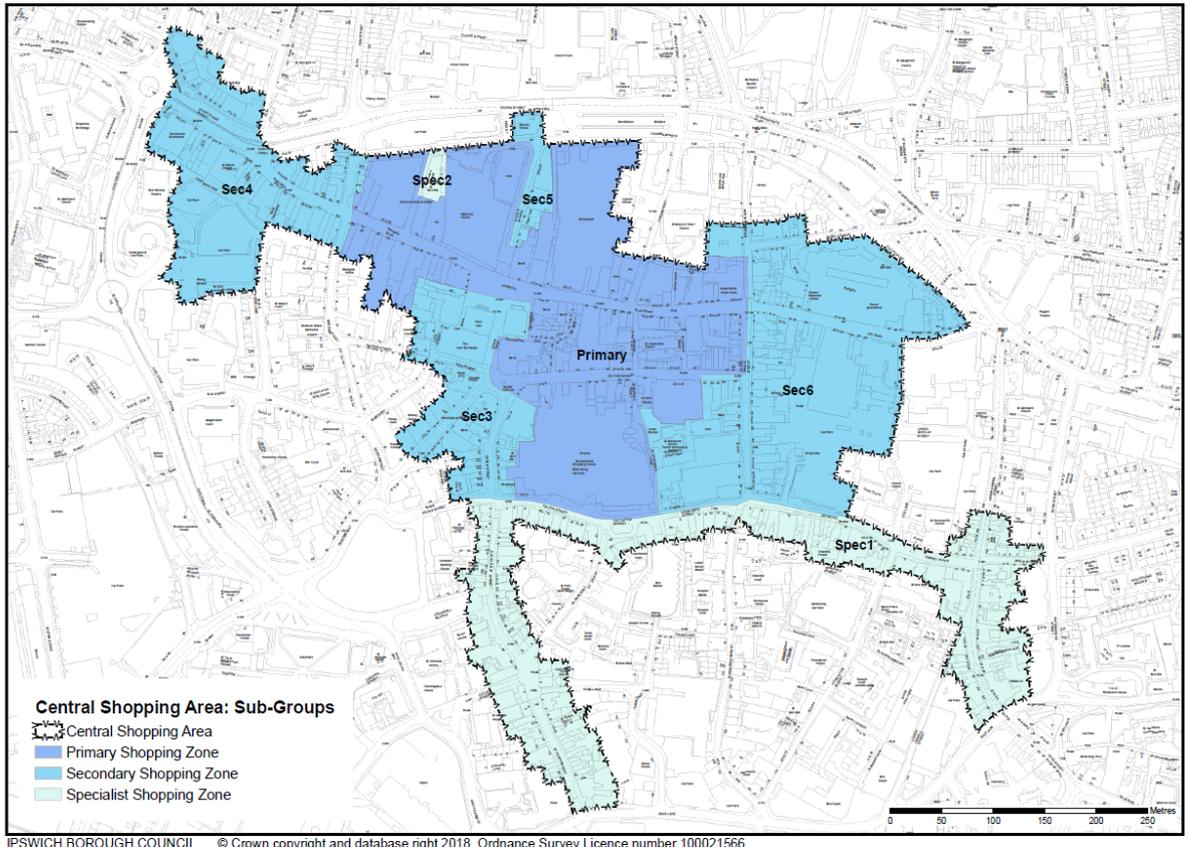
- 2.1 Developers are advised to discuss marketing arrangements prior to advertising, to ensure there is a clear strategy and that it meets Council expectations and avoids delays in the planning process (e.g. having to repeat the process).
- 2.2 This exercise should take all considerable steps to actively market the site and should consider a number of methods such as site notices, promotion through land or estate agent, advertisement on an estates gazette or through websites and information of all methods used should be provided to the Council.
- 2.3 As part of the above steps, the Council will expect a for sale/for rent signboard to be erected on the exterior of the property for the duration of the marketing exercise with dated photographs provided as supporting evidence.
- 2.4 Marketing Particulars should include the following:-
  - Internal and external photographs
  - Location of the site
  - Description of the property marketed
  - Terms of lease
  - Guide Price/Rent
  - Current Planning status
  - Services and utilities
  - Energy Performance Certificate
  - Rateable value and business rates
  - VAT status
  - Legal and professional costs
  - Viewing arrangements
  - Contact information for the agent.

- 2.5 All contact received enquiring about the site should be logged accordingly and monitored. Details of all approaches and offers should be provided to the Council together with full reasons as to why any offer has not been accepted. The Council will require a schedule stating the origin of any enquiry.
- 2.6 The site must be marketed at a price consistent with market value for its current use following independent valuation (funded by the developer) by a professional Royal Institution of Chartered Surveyors (RICS) valuer with expertise in the relevant use and who is not engaged to market the property. The site must be marketed for the existing or most-recent use and not under a generic 'all options' use.
- 2.7 Details should be provided to the Council of the company/person who undertook the marketing exercise.

### 3. Outcomes

- 3.1 If after 12 months of marketing the site, there has been no success in selling or letting the site, a report on the full marketing process should be prepared and submitted with a planning application for redevelopment or change of use.
- 3.2 This Marketing report should contain the following:
  - The original marketing strategy and evidence that it was delivered.
  - The duration and dates of the marketing campaign.
  - A full record of enquiries which were received during the course of the campaign. This should record the date of the enquiry, details of the enquiry, if the property was inspected and why the enquiry was unsuccessful. If any offers were rejected, the grounds on which these were rejected should be provided.
  - If a lack of interest was received, evidence should be provided of alternative approaches used to aim to increase interest.

## APPENDIX 7: DM27 Central Shopping Area Maps



## APPENDIX 8: HERITAGE STATEMENT GUIDANCE

A heritage statement should include the following:

- a) Identify and describe all the heritage assets that may be affected by the proposed development, with an assessment of their heritage significance. The description should normally go beyond simply quoting published material such as a list description or Historic Environment Record (HER) entry, because it should enable the reader to understand the context of the proposals being assessed in the next section. Significance may not always be clear from list descriptions or HER entries. Close inspection of a building or site often reveals features previously unrecorded, and which sometimes fundamentally alter our understanding of a heritage asset.
- b) Assessment of impact – this describes the impact of the proposed development, and how it will alter or affect the heritage asset(s) and the setting. Questions to bear in mind while writing this section may include some or all of the following:
  - a. Does the statement sufficiently explain why the proposals are necessary or desirable?
  - b. Does the proposal affect any views looking away from or towards the asset?
  - c. If any historic fabric is to be removed or altered, is its significance properly understood and explained in the document?
  - d. Are the design details of any proposed new work clearly described in the Statement, to make up for any shortcomings in the submitted plans?
  - e. Has a variety of options been considered and why was this option chosen?
  - f. Are the works reversible in whole or in part?
  - g. If the proposed works will result in any harm, is the harm offset or outweighed by any public benefits?
- c) A mitigation strategy may be necessary. Sometimes, the mitigation of any adverse effects will have been worked through and resolved by amending or evolving the plans prior to submission, or there may be no mitigation measures necessary (e.g. when the intention of the works is solely to improve, repair or restore). However, for some categories of work it will be necessary to include a

mitigation strategy that addresses the perceived impacts of the proposed development on the significance of the historic asset. This might include modification or explanation of methods and materials, incorporation of planting or hard landscaping schemes, or a scheme of archaeological or architectural investigation and recording. A mitigation strategy may be evolved or modified between the applicant and the Borough Council.