

THE LICENSING ACT 2003

CUMULATIVE IMPACT POLICY

Effective November 2021 to November 2024.

Public Protection
Ipswich Borough Council Grafton House
15-17 Russell Road
Ipswich IP1 2DE

1. Cumulative Impact Assessment (CIA)

Review of CIA

A review of the current CIA was undertaken during September 2021 to consider if the Licensing Authority remains of the opinion set out in the assessment. After consulting the persons listed in section 5(3) of the Licensing Act 2003 and reviewing the fresh and updated evidence, the Licensing Authority is still satisfied that: there is evidence of a disproportionate detrimental effect on neighbouring businesses and residents resulting from the operation of the licensed trade that has the effect of undermining the licensing objectives; and that it is still appropriate to operate a Cumulative Impact Assessment.

Cumulative Impact Assessment (CIA)

- 1.1 Cumulative impact is the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area, which goes beyond that which can be dealt with via premises-specific enforcement.
- 1.2 Ipswich has operated a cumulative impact assessment (CIA) since January 2014 for a defined area as listed below at 25.16. The area identified within the CIA remains unchanged (Appendix 4)
- 1.3 The cumulative impact of licensed premises on the promotion of the licensing objectives is a matter that the Licensing Authority can take into account. This should not, however, be confused with 'need' which concerns the commercial demand for a particular type of premises e.g., a pub, restaurant or hotel. The issue of 'need' therefore does not form part of this licensing policy statement.
- 1.4 The Licensing Authority recognises that the cumulative effect of licensed premises may have negative consequences which could include:
 - an increase in crime against both property and persons;
 - an increase in anti-social behaviour;
 - an increase in noise causing disturbance to residents:
 - traffic congestion and/or parking difficulties; and
 - an increase in littering and fouling

and that enforcement action taken to ensure that conditions are complied with may not always resolve any problems experienced in the vicinity of licensed premises.

- 1.5 The Licensing Authority has undertaken the following steps in considering whether to publish this Cumulative Impact Assessment within this statement of licensing policy:
 - Identified concern about crime and disorder, public nuisance, public safety and protecting children from harm.

- Considered whether there is good evidence that there are impacts upon the licensing objectives which are caused by customers of licensed premises, and that the risk of cumulative impact is imminent.
- Identified the boundaries of the areas where problems are occurring.
- Consulted with those specified in section 5(3) of the Licensing Act 2003, on the proposal for a Cumulative Impact Assessment in relation to new applications and variations to existing Premises Licences and Club Premises Certificates and considered the outcome of the consultation.
- Considered its responsibilities under section 5A of the Licensing Act 2003.
- Considered the revised guidance under section 182 of the Licensing Act 2003.
- 1.6 Responsible Authorities and/or other persons will need to make a relevant representation, before the Licensing Authority may lawfully consider giving effect to its CIA. I.e. if there are no representations, the Licensing Authority must grant the application in terms that are consistent with the operating schedule submitted and any mandatory conditions required by the Licensing Act 2003.
- 1.7 The Licensing Authority recognises that a CIA should never be absolute. The circumstances of each application will be considered properly and on its own merits, and applications that are unlikely to add to the cumulative impact on the licensing objectives may be granted. After receiving representations in relation to a new application or variation, the Licensing Authority will consider whether it would be justified in departing from its CIA in the light of the individual circumstances of the case. The impact can be expected to be different for premises with different styles and characteristics. If the Licensing Authority decides that an application should be refused, it will still need to show that the grant of the application would undermine the promotion of the licensing objectives and that appropriate conditions would be ineffective in preventing the problems involved.
- 1.8 This Cumulative Impact Assessment will not be used:
 - As a ground for revoking an existing licence or certificate when representations are received about problems with those premises;
 - To justify rejecting applications to vary an existing licence or certificate except where those modifications are directly relevant to the CIA (as would be the case with an application to vary a licence with a view to increasing the capacity limits of the premises) and are appropriate for the promotion of the licensing objectives;
 - To impose quotas based on either the number of premises or the capacity of those premises, or that restrict the consideration of any application on its individual merits or which seek to impose limitations on trading hours in particular areas. Quotas have no regard to individual characteristics of the premises concerned. Proper regard will be given to those differences and the differing impact they will have on the promotion of the licensing objectives.

1.9 This cumulative impact assessment will be reviewed regularly to assess whether it is still needed or should be expanded.

Reasons for Cumulative Impact Assessment being revised 1st January 2022

- 1.10 Data has been provided by various agencies relating to the impacts of the licensed trade upon the licensing objectives, where possible covering the period January 2018 September 2021. This evidence is included as appendix 1-3 to this policy.
- 1.11 Analysis of the information provided in paragraph 25.12 demonstrates that there are impacts on the licensing objectives resulting from the operation of both On and Off-licensed premises. Appendix 1- 3 are summarised as being:

Appendix 1

- The analysis (Appendix 1- page 1) p rovided by Suffolk Constabulary covering January 2018 to December 2020 show a greater density of crime at Licensed premises, alcohol related crime and anti-social behaviour within the existing Cumulative Impact area.
- The analysis (Appendix 1-pages 2 & 3) demonstrates that most problems of alcohol related anti-social behaviour occurs between Friday and Sunday and between 22:00hrs and 03:00hrs peaking between 22:00hrs-01:00hrs. The highest volume of these incidents occur within the town centre area. Between 2018 and 2020 there has been a reduction of 41% from 109 reported incident in 2018 to 64 incidents in 2020. The low level in 2020 can be attributed to the lockdown due to the Covid pandemic.
- The analysis (Appendix 1-pages 4 & 5) of alcohol related crime shows Friday to Sunday to be the busiest with peaks in crime starting between 21:00hrs and midnight and gradually tapering to 04:00hrs Crime has almost doubled since 2017 and remains consistently high throughout the Covid pandemic.
- The analysis (Appendix 1-pages 6 & 7) of crime on licensed premises show that between 2017 and 2018 there has been an increase of 28%, from 346 in 2017 to 444 in 2018. However since 2018 it has dropped by 65% in 2020, when the Covid pandemic required licensed premises to be closed for large parts of the year.

Appendix 2

- The data (Appendix 2) provided by Public Health Suffolk have identified 15 Lower- Layer Super Output Areas (LSOAs) within the existing CIA area. The data from these LSOAs was last updated in 2019.
- The data (Appendix 2) section 2.2, identifies that ten of the LSOAs within the CIA are amongst the top 20% with the highest access to off licenses in the country.
- The data (Appendix 2) section 2.3, identifies three LSOAs within the CIA as having significantly higher rates of alcohol related A&E attendance and five LSOAs where alcohol related hospital admissions are higher than the rest of Ipswich and indeed England.

- The data (Appendix 2) section 3, identifies that people living in deprived areas have poorer health outcomes than the national average and are more susceptible to potential harms due to alcohol E.g. alcohol related injuries and poisoning. Men can be five times more likely and women three times more likely to die of an alcohol related death than those in the least deprived areas. The CIA area has mixed levels of deprivation.
- The data (Appendix 2) section 4 shows that much of the CIA area has the highest levels of off- licence accessibility in Great Britain.
- The data (Appendix 2) section 5 (Figurers 4-18) show the alcohol related accident and emergency attendances for each of the 15 individual LSOAs within the CIA, compared to Ipswich, Suffolk and England.
- The data (Appendix 2) section 6 (Figurers 19-33) show the alcohol related hospital admission rates for each of the 15 individual LSOAs within the CIA, compared to Ipswich, Suffolk and England.

Appendix 3

- The data (Appendix 3) provided by Ipswich Borough Council Licensing Authority shows the numbers of premises licence and Club Premises Certificate applied for and their outcome.
- The data (Appendix 3) shows that in 2018, there were 33 application, 19 of which were in the CIA area of which 18 were granted and 1 was withdrawn.
- The data (Appendix 3) shows that in 2019, there were 41 application, 21 of which were in the CIA area of which 19 were granted and 1 was withdrawn and 1 was not granted.
- The data (Appendix 3) shows that in 2020, there were 25 application, 19 of which were in the CIA area of which 17 were granted and 1 was withdrawn and 1 was not granted.
- The data (Appendix 3) shows that in 2021 up to September, there were 21 application, 13 of which were in the CIA area of which 11 were granted and 2 was not granted.
- 1.12 Whilst the Licensing Authority supports the contribution of the night-time economy and licensed trade generally, on the basis of the evidence presented, the Licensing Committee has decided that it is appropriate to adopt a CIA to promote the four licensing objectives:
 - Prevention of Crime and Disorder:
 - Promotion of Public Safety;
 - Prevention of Public Nuisance;
 - Protection of Children from Harm.
- 1.13 Based on the evidence considered, the CIA will apply to applications for:
 - New Premises Licences:
 - New Club Premises Certificates;
 - Provisional Statements;

 Variations to Premises Licences or Club Premises Certificates which are likely to add to the existing cumulative impact (e.g. by asking for an extension to authorised hours for licensable activity, increase in capacity).

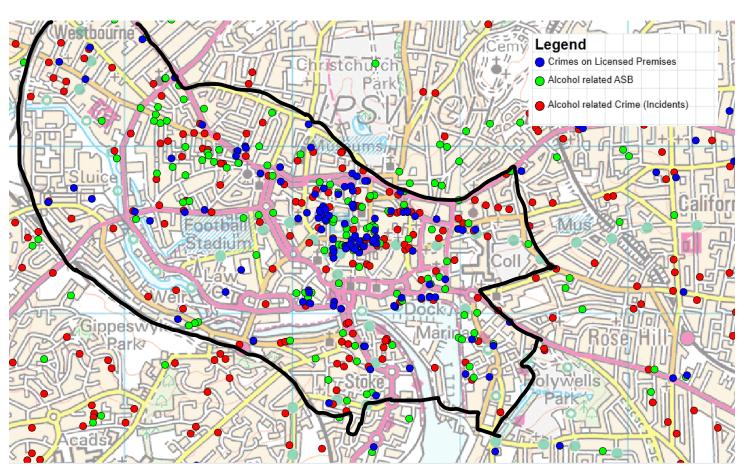
And, will apply to premises which:

- Authorise the sale or supply of alcohol for consumption on the premises, and/or;
- Authorise the sale or supply of alcohol for consumption off the premises, and/or;
- Authorise the supply of late night refreshment.
- 1.14 The cumulative impact assessment will not apply to applications or premises for which the supply of alcohol is ancillary to the primary business use (e.g. because alcohol is only supplied to persons residing at the premises or with a table meal)
- 1.15 The CIA therefore applies to the areas created within the boundaries formed by the following roads:
 - Norwich Road (towards town from the 'Ferodo' bridge)
 - Anglesea Road
 - Henley Road
 - Fonnereau Road
 - St Margaret's Plain
 - St Margaret's Street
 - Woodbridge Road to its junction with North Hill Road
 - Warwick Road
 - Grove Lane
 - Back Hamlet
 - Fore Hamlet to its junction with Myrtle Road
 - Myrtle Road
 - Along the Western edge of Holywell's Park from Myrtle Road to Cliff Lane
 - Drayman's Way
 - Along a line between the southern end of Drayman's Way and the River Orwell
 - Waterfront
 - Bath Street
 - Station Street
 - Wherstead Road
 - Croft Street
 - Rectory Road
 - Luther Road
 - Railway line followed from Burrell Road around the west of Ipswich to Norwich Road.

2. Further Advice and Guidance

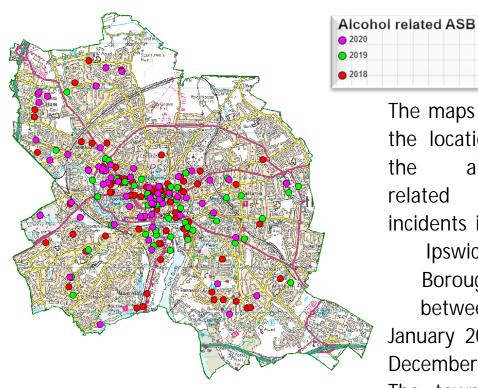
2.1 For further advice about whether or not activities should be licensed please contact licensing@ipswich.gov.uk

Appendix 1-Map of Results – Crimes on Licensed Premises, Alcohol related incidents and ASB – Ipswich, 2018 - 2020



The map shows the location of alcohol related crime incidents. alcohol related ASB incidents and crimes recorded on licensed premises in the current Cumulative Impact Zone over the past 3 between years, 2018 and January December 2020.

Alcohol related ASB – Map of Results

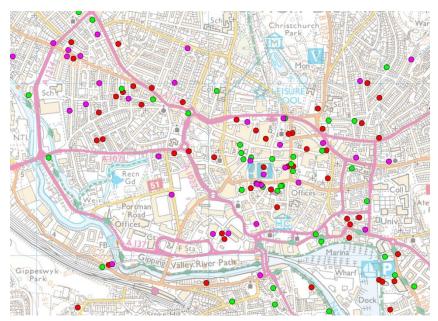


The maps show the location of the alcohol **ASB** related incidents in the **Ipswich** Borough

January 2018 and December 2020. The town centre

between

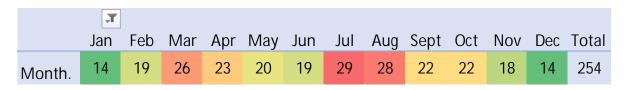
continues to be the hotspot area which can be seen in more detail on the top right map. Levels have fallen significantly year The very low levels in 2020 can be attributed to on year. lockdown due to the COVID pandemic.





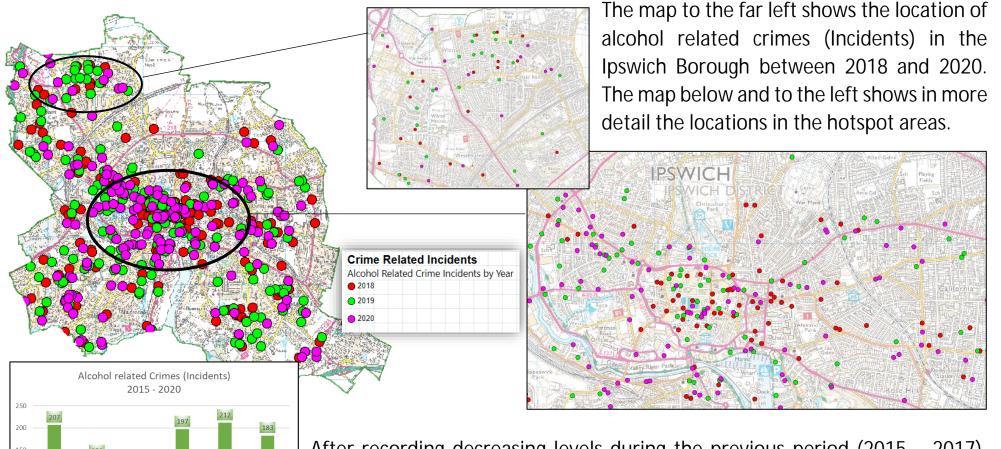
Alcohol Related ASB – Table of Results

		T,																								
Day	Ţ	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	Total
Monday		1	1		1				1		2	1	1		2	3		1	2	3	1	2	1		2	25
Tuesday		2	3	3	2						2	1			1		1	2	1		1	5	2	1		27
Wednesday		2	1	1		1								2		3		1	1	2			2	2	4	22
Thursday			2	1	1				_	1			1	2		2	2	1	2	3	1	1	3	6	3	32
Friday		1	5	4	4			1		2		1		2	1	2	3	3	2	1	1	4	3	4	6	50
Saturday		5	5	3	1		2		2	1		2		1		2	2	4	2	3	4	1	3	6	7	56
Sunday		6	6	2	3		2	1	1	1	1				1	1		2	1	2	2		1	7	2	42
Total		17	23	14	12	1	4	2	4	5	5	5	2	7	5	13	8	14	11	14	10	13	15	26	24	254



The above tables show the breakdown of alcohol related ASB in the Ipswich Borough area broken down by day of the week and hour between 2018 and 2020, the lower table is a breakdown by month. As with the previous reporting period (2015-2017), the hotspot times are between 22:00 and 01:00 and on Friday, Saturday and Sunday's. July, August and March were the highest when looking at seasonality.

<u>Alcohol Related Crime – Map of Results</u>



After recording decreasing levels during the previous period (2015 – 2017), levels of alcohol related crime incidents have remained relatively consistent between 2018 and 2020 with an average of 197 incidents recorded per year.

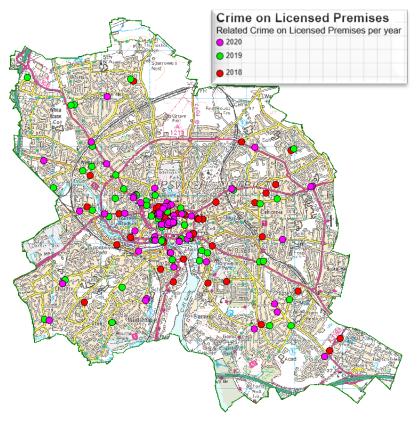
Alcohol Related Crime – Table of Results

The below tables show the breakdown of alcohol related crime (Incidents) in the Ipswich Borough broken down by day of the week and hour between 2018 and 2020, the lower table is a breakdown by month to show any seasonality changes. Hotspot days/times have remained consistent with levels seen in the previous reporting period (2015-2017).

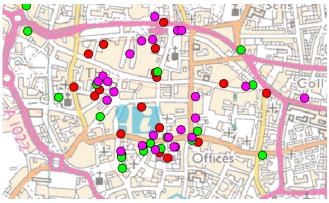
Day 🔽	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	Grand Total
Monday	4	3	2	1	3	2	1	1			2	2	2		1	6		1	1	4	4	6	4	13	63
Tuesday	5	2	5	4	3		1			1	2	1	2	2	2	2	2	3	2	6	3	7	3	5	63
Wednesday	5	3	2	3	3	1				1	1	1		1	2	1	3	2	5	6	3	7	5	3	58
Thursday	7	2	2	2					2	1	2	1	3		2	1	1	6	3	3	4	3	11	9	65
Friday	11	6	9	5	1		1		2	2	3	1	3	3	1	3	5	3	2	6	10	4	7	11	99
Saturday	10	5	6	6	4	5		4	3	3	2	3	5	2	1	2	1	3	3	3	7	12	12	8	110
Sunday	17	17	12	13	6	3	2	2	1	2	1	3	2	2	1	5	4	4	5	5	5	4	9	9	134
Grand Total	59	38	38	34	20	11	5	7	8	10	13	12	17	10	10	20	16	22	21	33	36	43	51	58	592

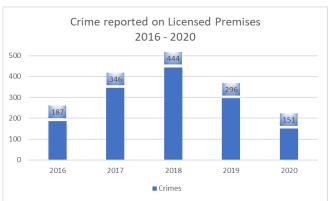
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	GrandTotal
Month1	48	50	48	39	62	44	51	55	39	55	40	61	592

All Crime on Licensed Premises – Map of Results



The maps show the locations of all crimes recorded at licensed between premises 2018 and 2020 in the Ipswich Borough. As per the legend, the points are colour coded by year. The more detailed map shows, as expected, offences are clustered around the centre of town where





there is a higher intensity of licensed premises. Levels of

crime increased in 2018 by 28% when compared to 2017, but levels have decreased year on year since, with the level recorded in 2020 48% lower than the levels in 2019. This could be explained due the pandemic which meant due to lockdown, licensed premises were unable to open for prolonged periods during 2020.

All Crime on Licensed Premises – Table of Results

77

70

68

Month.

92

76

The below tables show the breakdown of crime recorded as occurring on licensed premises in the Ipswich Borough Area. The first table shows a breakdown of day of the week and hour between 1st January 2018 and 31st December 2020. The lower table is by month to show any seasonal changes.

Please note that the numbers are different in the two tables as not all offences have a time period recorded.

	Ţ,																							
Day 🗾	0	1	2	3	4	5	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	Total
Monday	1	5	3	1	1		1			_	1	2		2	3	6	3	2	2	2		3	11	49
Tuesday	3		3	3			1		1			1	1	2	6	2	2	3	4	5	3	4	3	47
Wednesday	2	1				1		1	1				1	4		1	1	4	5	6	3	5	4	40
Thursday	2	3	1	1			1			1	3		1	1		4	1	3	4	3		7	6	42
Friday	5	5	2	2				1	1					1	1	1		4	5	5	5	19	16	73
Saturday	14	33	16	11	1					1	2	2		4		2	2	9	8	9	12	20	32	178
Sunday	23	39	35	22	2	1			1	1	1		6	2	4		2	5	3	2	5	7	2	163
Total	50	86	60	40	4	2	3	2	4	3	7	5	9	16	14	16	11	30	31	32	28	65	74	592
_																								
Jan	Feb	Mar	- Apı	r Ma	ıy Ju	n Ju	ıl A	ug S	ept (Oct	Nov	Dec	Total											

891



Appendix 2-Ipswich Cumulative Impact Area – Public Health Data September 2021

Public Health Suffolk Licensing Email: PH.licensing@suffolk.gov.uk

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1. Introduction

A Cumulative Impact Area (CIA) is a geographic area defined by a Licensing Authority where there is evidence to show that the number or density of licensed premises is having a cumulative impact and leading to problems that are undermining the alcohol licensing objectives. Ipswich Borough District Council is undergoing a review of the Ipswich CIA and has approached public health with a request for data to help support this review. This document provides routine public health data to help inform the review, specifically information on health deprivation, access to off-licenses, and alcohol related A&E attendances/hospital admission rates.

Figure 1 shows the current CIA and relevant Lower-Layer Super Output Areas (LSOAs). LSOAs are a standard way of dividing up the country into small areas of approximately 2,000 people or 650 households. Information in this report has been provided about the following fifteen areas that are wholly or mostly within the CIA. One of the fifteen LSOAs (E01033122*) has a Population-Weighted Centre just outside of the CIA (that is, over 50% of the population of the LSOA live outside the boundary of the CIA) but is included for completeness.

- E01029962
- E01029968
- E01029985
- E01029988
- E01030022
- E01030023
- E01030024
- E01030025

- E01030026
- E01033124
- E01033125
- E01033126
- E01033129
- E01033130
- E01033122*



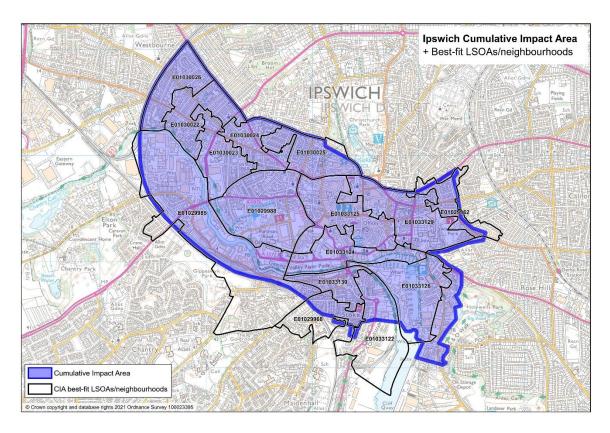


Figure 1: Map of Ipswich with current CIA and closest LSOA boundaries identified:

2. Executive summary

As requested by Ipswich Borough Council, this document contains information regarding fifteen LSOAs which have land within the CIA. A summary of the information within this document is provided below.

Overall, considering the high degree of deprivation and already high level of alcohol licencing availability within the CIA, as well as that parts of the CIA currently have disproportionately high degrees of alcohol-related hospital attendance and admission, we would advocate maintaining the CIA from a public health perspective. Further liberalisation of alcohol licencing in the area is likely to exacerbate these issues and negatively impact the local population's health and wellbeing.

2.1 Deprivation levels

Information is provided on levels of health deprivation which measures the risk of premature death and the impairment of quality of life through poor physical or mental health. This information was last updated by the government in 2019. Deprivation levels in the fifteen relevant LSOAs are mixed, with seven of the LSOAs being within the 20% of the most health deprived LSOAs in England, four within the second 20%



of most health-deprived LSOAs, and the remaining four LSOAs in the middle 20% (that is, average level of wealth/deprivation) in the country.

2.2 Access to off-licenses and schools in the area

Access to off-licenses is consistently high across the current CIA. Ten of the LSOAs covered are in areas in the top 20% of areas with highest accessibility to off-licenses in Great Britain, and the remaining five LSOAs are in the second 20%. There are seven primary schools located within the LSOAs covered.

2.3 Alcohol-related accident and emergency (A&E) admissions and hospital admissions

Three LSOAs have an alcohol-related A&E attendance rate that is significantly different (higher) than the rate for Ipswich, Suffolk and England overall. These are: E01029988, which is the southernmost LSOA on the map and half within the CIA; E01030024, which in within the northern part of the CIA; and E01033129, which is central in the CIA.

Five LSOAs have an alcohol-related hospital admission rate that is significantly different (higher) than for Ipswich, Suffolk, and England. These are the same three LSOAs as above (E01029988, E01030024 and E01033129) as well as E01033125, which is central in the CIA, and E01033130, which is central-south in the CIA.

3. Demographic information

Figure 2 maps the Indices of Multiple Deprivation (Health and Disability Domain) of the five LSOAs specified.

As indicated by the map, levels of health deprivation in the CIA and in the area surrounding are mixed. People living in more deprived areas have poorer health outcomes than the national average and are more susceptible to the potential harms due to alcohol (such as alcohol related injuries and poisoning). Suffolk Alcohol Strategy¹ highlights that, in the most deprived areas, men are five times more likely and women three times more likely to die of an alcohol related death than those in the least deprived areas.

¹ Suffolk Alcohol Strategy 2014-2022. Available at: https://www.healthysuffolk.org.uk/uploads/2014-2022 - Alcohol Strategy booklet v03.pdf



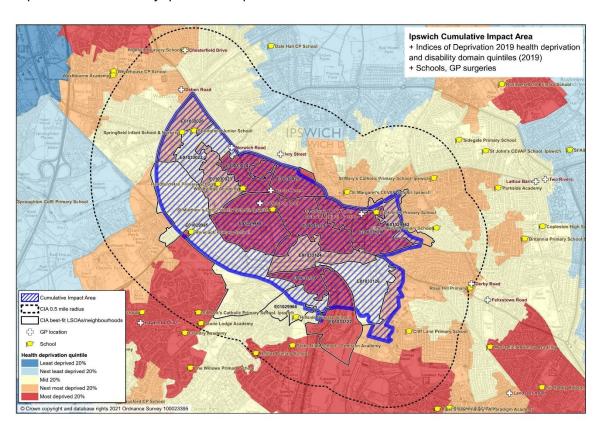


Figure 2: Map of Ipswich with current CIA and closest LSOA boundaries showing Indices of Health Deprivation and Disability quintiles and points of interest.

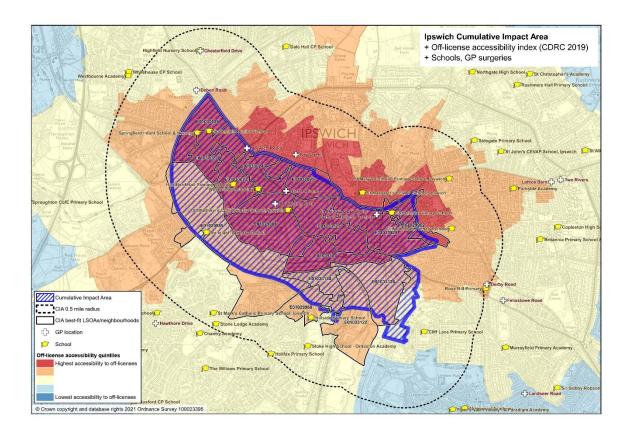
4. Off-license density

Figure 3 maps data from the Access to Health Assets and Hazards index (developed by the Consumer Data Research Centre for Great Britain measuring how 'healthy' neighbourhoods are) and shows level of access to alcohol off-licenses at LSOA level.

This shows that much of the current Ipswich CIA falls within LSOAs with the highest levels of off-license accessibility in Great Britain.



Figure 3: Map of Ipswich with current CIA and closest LSOA boundaries showing accessibility to alcohol off-licenses.



5. Alcohol-related accident and emergency department attendance rates

Figures 4 to 18 shows the alcohol-related accident and emergency attendance rates for the LSOAs in the CIA. These are compared to data from Ipswich district, Suffolk County, and England.



Figure 4: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01029962 – financial years 2017/18 – 2019/20

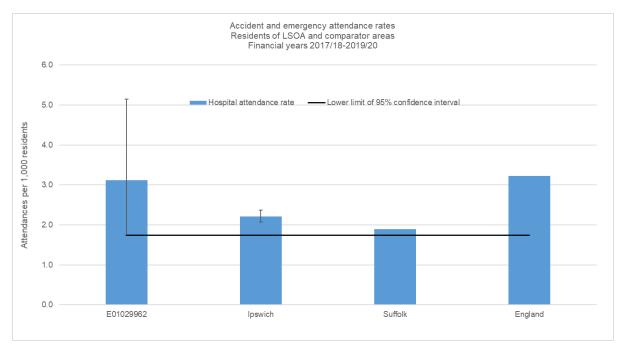


Figure 5: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01029968 – financial years 2017/18 – 2019/20

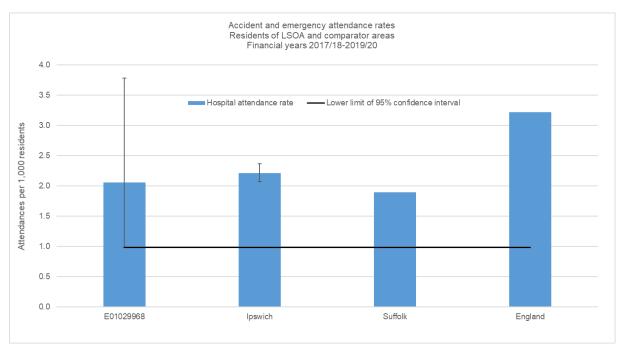




Figure 6: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01029985 - financial years 2017/18 – 2019/20

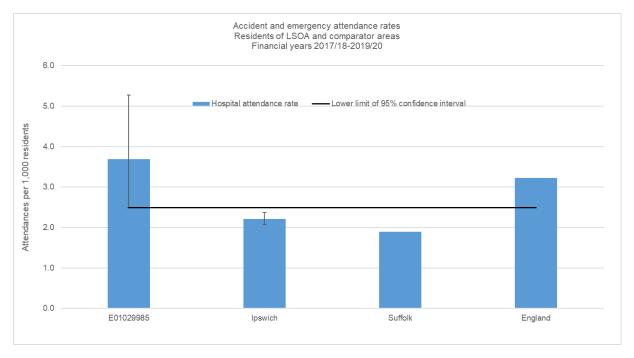


Figure 7: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01029988 - financial years 2017/18 – 2019/20

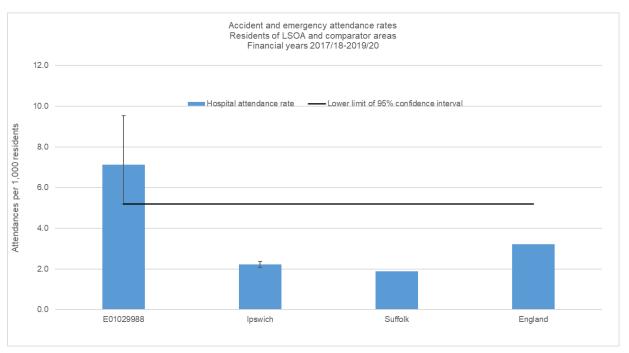




Figure 8: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01030022 - financial years 2017/18 – 2019/20

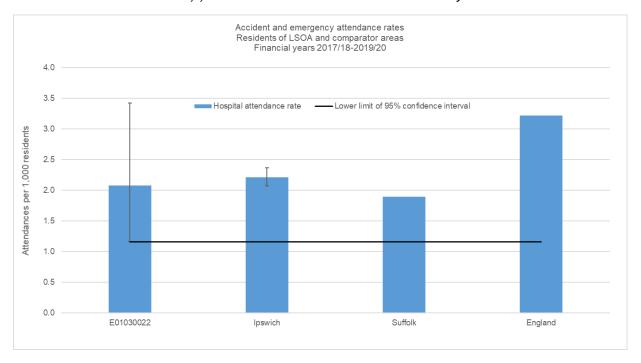


Figure 9: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01030023 - financial years 2017/18 – 2019/20

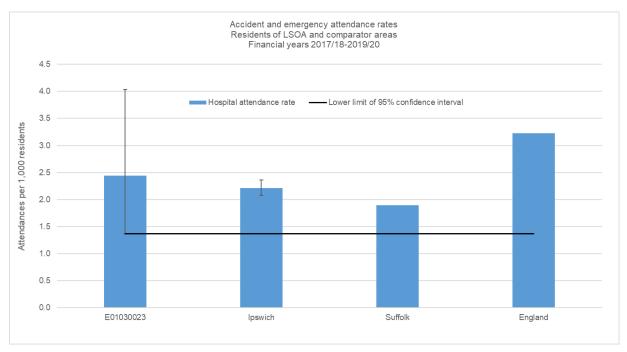




Figure 10: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01030024 - financial years 2017/18 – 2019/20

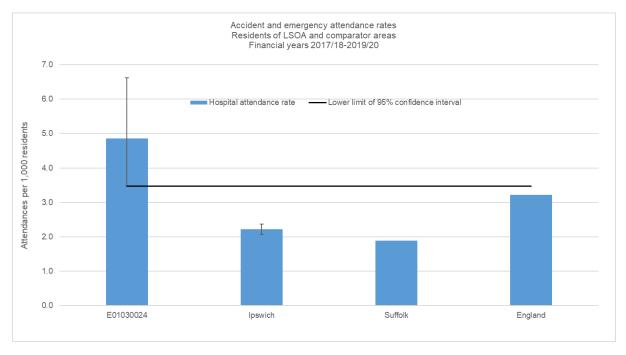


Figure 11: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01030025 - financial years 2017/18 – 2019/20

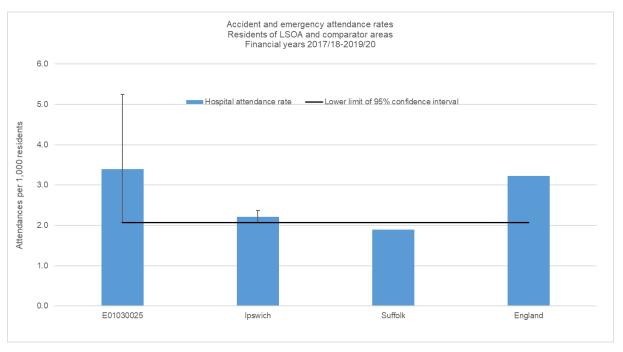




Figure 12: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01030026 - financial years 2017/18 – 2019/20

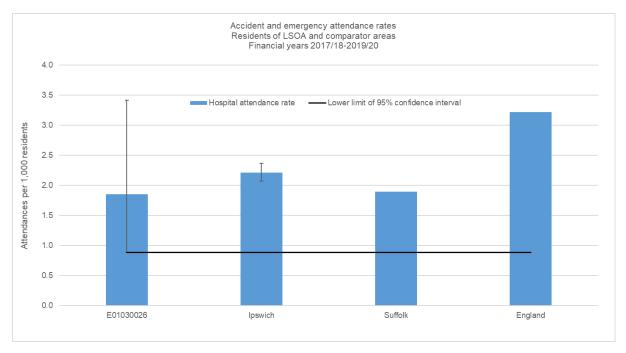


Figure 13: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01033124 - financial years 2017/18 – 2019/20

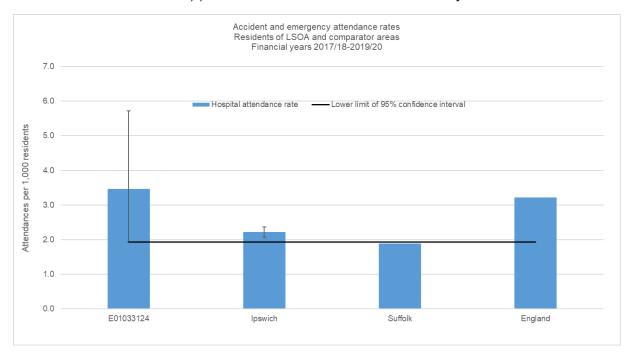




Figure 14: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01033125 - financial years 2017/18 – 2019/20

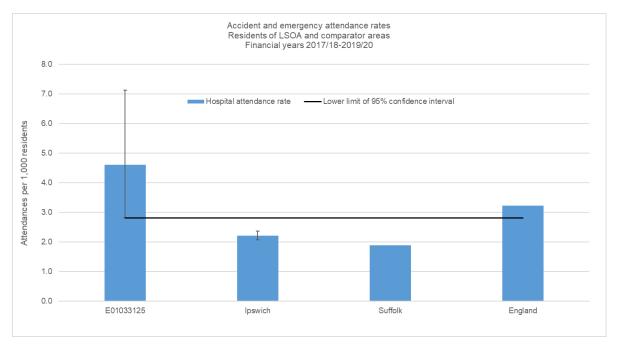


Figure 15: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01033126 - financial years 2017/18 – 2019/20

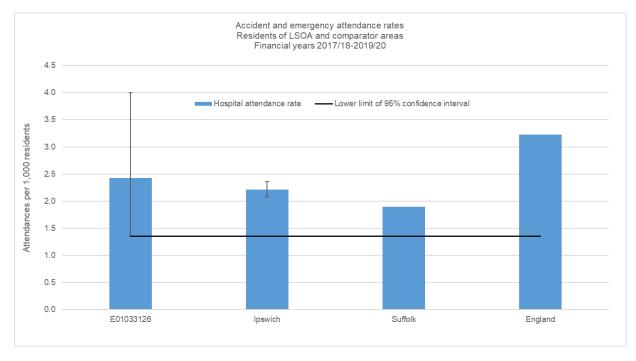




Figure 16: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01033129 - financial years 2017/18 – 2019/20

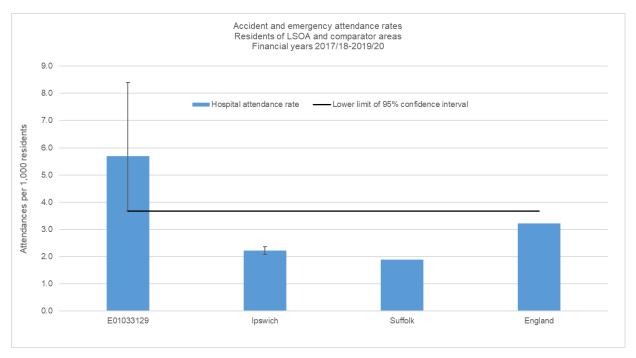


Figure 17: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01033130 - financial years 2017/18 – 2019/20

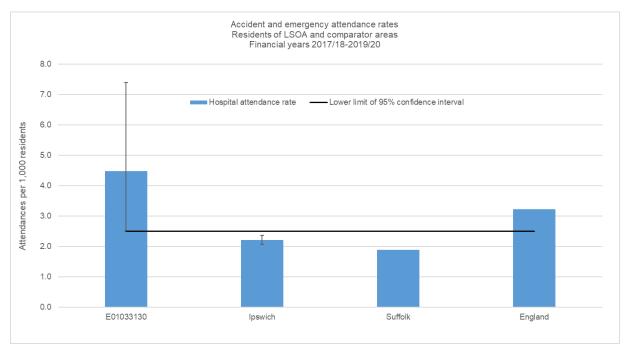
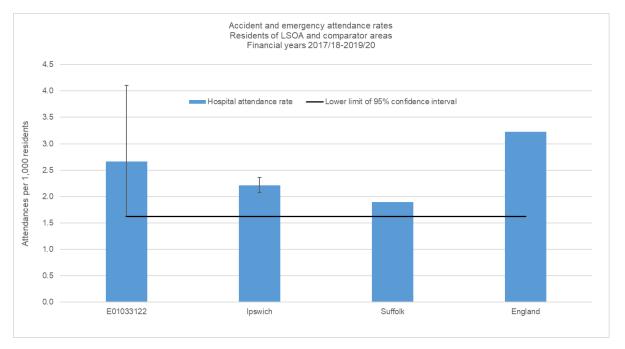




Figure 18: Accident and emergency attendance rates (first A&E attendances with a diagnosis of either "poisoning (including overdose) - other, including alcohol" or "social problems (including chronic alcoholism and homelessness)"): residents of LSOA E01033122 - financial years 2017/18 – 2019/20



The 95% confidence intervals are displayed as vertical bars. The lower bound of the confidence interval for the LSOA is indicated by the black horizontal line on the graph. If the confidence interval for the LSOA in question encompasses the confidence interval for another area, the difference between them is not statistically significant. Statistical significance means the difference we see is real, and not due to chance.

The rates for the comparator areas are 2.2 per 1,000 residents in Ipswich, 1.9 per 1,000 residents in Suffolk, and 3.2 per 1,000 residents in England.

The rates of alcohol-related A&E attendances in the LSOA areas are as follows:

- In seven LSOAs, the rates are not significantly different to the local, regional or national average: E01029962, E01029968, E01030022, E01030023, E01030026, E01033126, and E01033122.
- In two LSOAs, the rates are significantly above alcohol-related A&E attendances regionally in Suffolk, but not significantly above attendance rates locally in Ipswich or nationally in England overall: E01030025 and E01033124.
- In three LSOAs, the rates are significantly above alcohol-related A&E attendances locally in Ipswich and regionally in Suffolk, but not significantly above attendance rates nationally in England overall: E01029985, E01033125 and E01033130.



• In three LSOAs, the rates are significantly above alcohol-related A&E attendances at a local, regional and national level, in Ipswich, Suffolk and England: E01029988, E01030024 and E01033129.

6. Alcohol-related hospital admission rates

Figures 19 to 33 show alcohol-related hospital admission rates for LSOAs in the Ipswich CIA. These are compared to rates for Ipswich district, Suffolk County, and England.

Figure 19: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of LSOA E01029962 and comparator areas - financial years 2017/18 – 2019/20

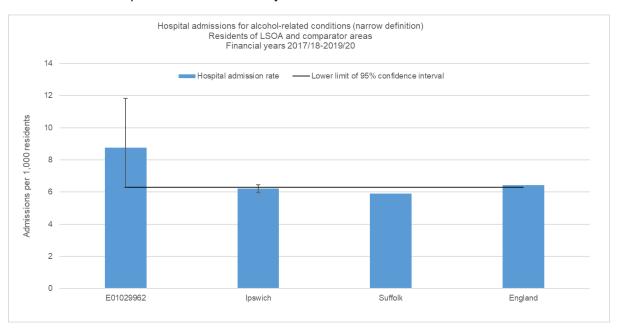




Figure 20: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01029968 and comparator areas - financial years 2017/18 – 2019/20

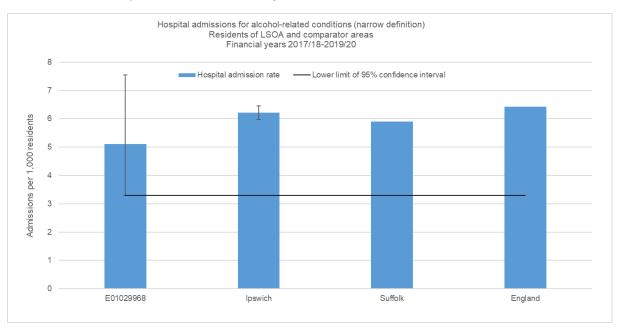


Figure 21: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01029985 and comparator areas - financial years 2017/18 - 2019/20

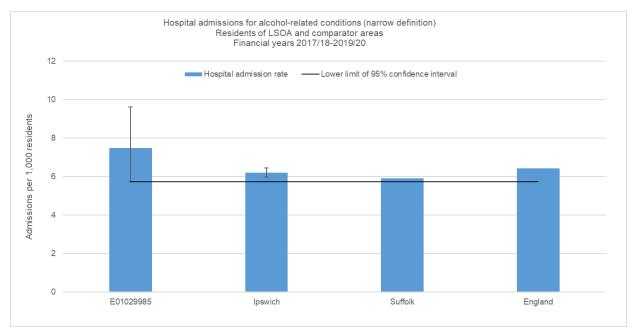




Figure 22: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01029988 and comparator areas - financial years 2017/18 – 2019/20

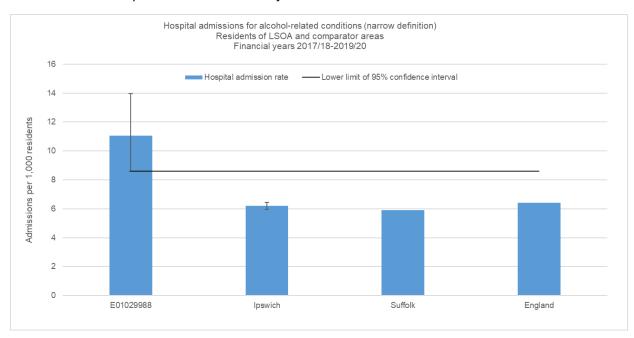


Figure 23: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01030022 and comparator areas - financial years 2017/18 - 2019/20

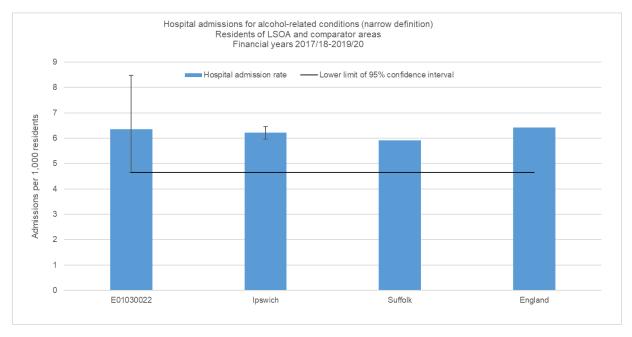




Figure 24: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01030023 and comparator areas - financial years 2017/18 – 2019/20

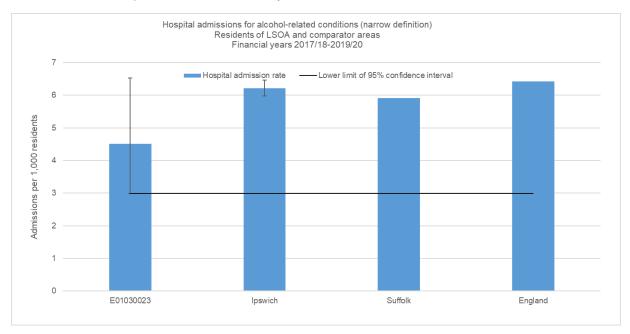


Figure 25: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01030024 and comparator areas - financial years 2017/18 – 2019/20

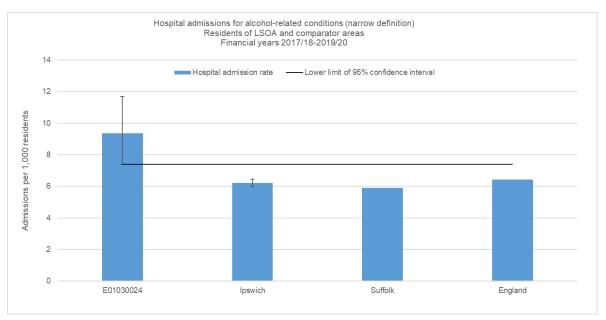




Figure 26: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01030025 and comparator areas - financial years 2017/18 – 2019/20

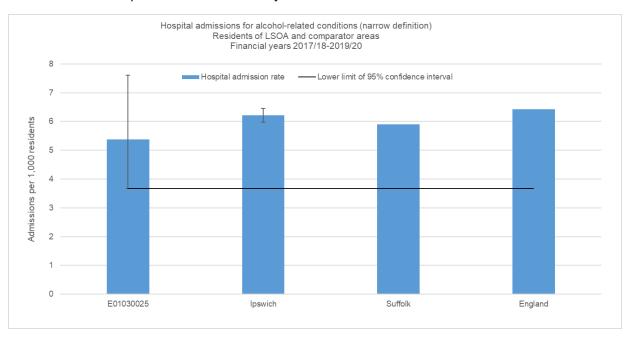


Figure 27: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01030026 and comparator areas - financial years 2017/18 – 2019/20

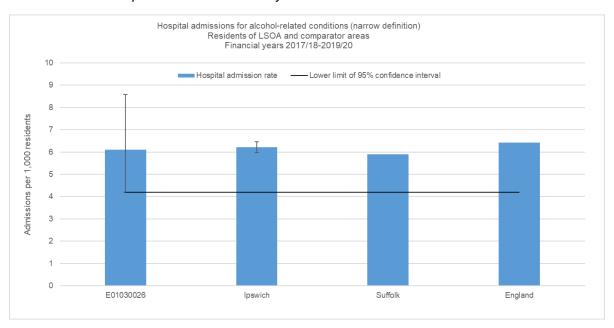




Figure 28: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01033124 and comparator areas - financial years 2017/18 – 2019/20

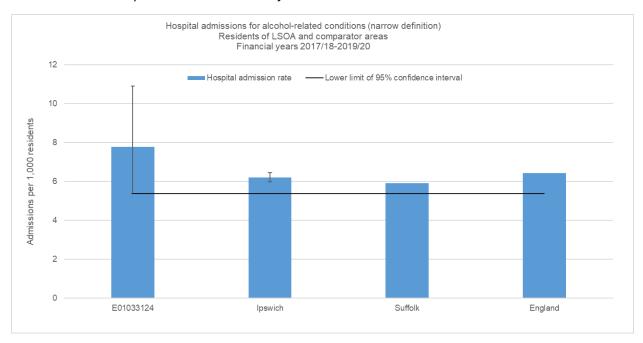


Figure 29: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01033125 and comparator areas - financial years 2017/18 - 2019/20

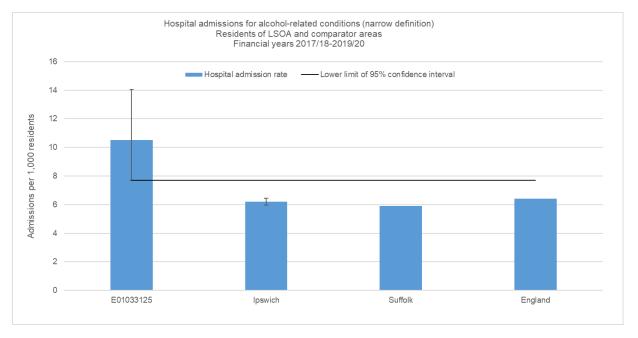




Figure 30: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01033126 and comparator areas - financial years 2017/18 – 2019/20

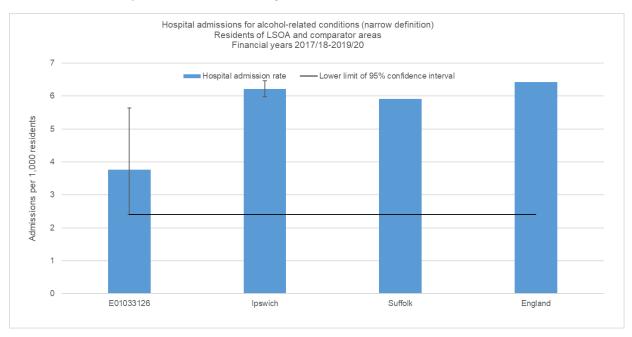


Figure 31: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01033129 and comparator areas - financial years 2017/18 - 2019/20

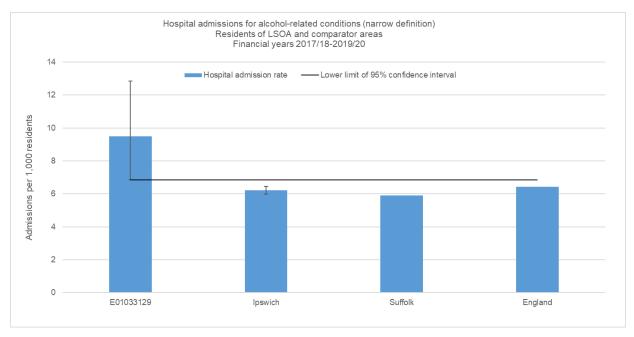




Figure 32: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01033130 and comparator areas - financial years 2017/18 – 2019/20

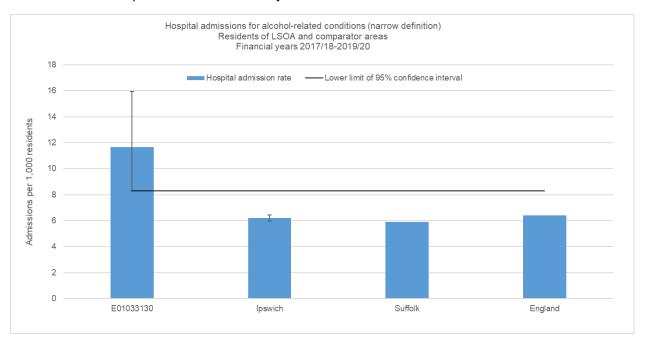
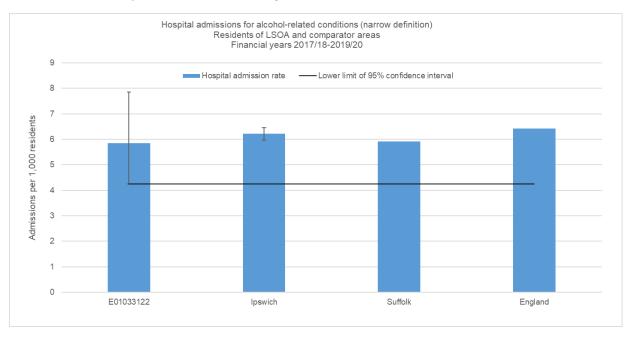


Figure 33: Hospital admissions for alcohol-related conditions (narrow definition) - Residents of E01033122 and comparator areas - financial years 2017/18 – 2019/20





As explained above, the 95% confidence intervals are displayed as vertical bars. The lower bound of the confidence interval for the LSOA is indicated by the black horizontal line on the graph. If the confidence interval for the LSOA in question encompasses the confidence interval for another area, the difference between them is not statistically significant. Statistical significance means the difference we see is real, and not due to chance.

The rates for the comparator areas are 6.2 per 1,000 residents in Ipswich, 5.9 per 1,000 residents in Suffolk, and 6.4 per 1,000 residents in England.

The rates of alcohol-related hospital admissions in the LSOAs are as follows:

- In nine LSOAs, the rates are not significantly different to the local, regional or national average: E01029968, E01029985, E01030022, E01030023, E01030025, E01030026, E01033124, E01033126, and E01033122.
- In one LSOA, the rate is significantly above alcohol-related hospital admissions regionally in Suffolk, but not significantly above attendance rates locally in lpswich or nationally in England overall: E01029962.
- In five LSOAs, the rates are significantly different to the local, regional or national average: E01029988, E01030024, E01033129 and E01033130.

7. Public Health Suffolk response

Overall, considering the high degree of deprivation and already high level of alcohol licencing availability within the CIA, as well as that parts of the CIA currently have disproportionately high degrees of alcohol-related hospital attendance and admission, we would advocate maintaining the CIA from a public health perspective. Further liberalisation of alcohol licencing in the area is likely to exacerbate these issues and negatively impact the local population's health and wellbeing.

Appendix 3 – Ipswich Borough Council Licensing Authority Licence applications

2018- 19 out of 32 in CIA area

Premises	Address	In CIA Area	Outcome
Zweton (New)	99 Felixstowe Road, Ipswich	NO	Granted with additional conditions
Loft Hair & Beauty (New)	39 St Nicholas Street, Ipswich	YES	Granted with additional conditions
	63 Bramford Road, Ipswich	YES	Application not regulation compliant. Terminated.
Dove Street Gin Inn (Variation)	82 St. Helens Street, Ipswich	YES	Granted with additional conditions
Gainsborough Labour & Social Club (Variation)	394 Landseer Road, Ipswich	NO	Granted with additional conditions
Salutation (Minor Variation)	65-67 Carr Street, Ipswich	YES	Application withdrawn by applicant
Belstead Arms (Minor Variation)	Radcliffe Drive, Ipswich	NO	Granted as requested
Pizza Hut (Minor Variation)	1 Anglian Parkway South, Bury Road, Ipswich	NO	Granted as requested
Shell Orwell (Minor Variation)	A14 Ipswich By Pass, Ipswich	NO	Granted as requested
Twenty Nine at the County of Suffolk (Minor Variation)	29 St. Helens Street, Ipswich	YES	Granted as requested
Thrasher (Minor Variation)	Nacton Road, Ipswich	NO	Granted as requested
Café Central - NEW	35-37 Norwich Road, Ipswich	YES	Granted with additional conditions

Premises	Address	In CIA Area	Outcome
Sailing Barge Melissa - NEW	Ipswich Wet Dock, Ipswich Haven Marina Ltd, Ipswich	YES	Granted with additional conditions
Cosy Club – MINOR VARIATION	Unit A3.1, Buttermarket, Ipswich	YES	Granted as requested
Spoon Ipswich Ltd – NEW	23-29 St. Matthews Street, Ipswich	YES	Granted with additional conditions
James Hehir Building (Cult Café) - VARIATION	5 University Avenue, Ipswich	YES	Granted with additional conditions
Co-op - VARIATION	203 Bramford Lane, Ipswich	NO	Granted as requested
Co-op - VARIATION	111-113 Cauldwell Hall Road, Ipswich	NO	Granted as requested
Co-op - VARIATION	145-147 Fircroft Road, Ipswich	NO	Granted as requested
Save Your Night - NEW	19 Holywells Road, Ipswich	NO	Granted with additional conditions
Co-op - VARIATION	3 Hines Road, lpswich	NO	Granted as requested
Ocean Fish Basket - NEW	43 Upper Brook Street, Ipswich	YES	Granted with additional conditions

Premises	Address	In CIA Area	Outcome
Golden Hind – MINOR VARIATION	470 Nacton Road, Ipswich	NO	Granted as requested
Off Licence - NEW	71 St John's Road, IP4 5DE	NO	Granted after mediation with the Police.
Coes - NEW	20 - 28 Norwich Road, IP1 2NH	YES	Granted after mediation with the Police.
Jackies Café & Deli - NEW	3A St Peters Street, IP1 1XF	YES	Granted after mediation with the Police.
Café Marina - NEW	1 University Avenue, IP3 OFR	YES	Granted after mediation with the Police.
Hotel Chocolat - NEW	40 Tavern Street, IP1 3AP	YES	Granted after mediation with the Police.
3 Wise Monkey's - NEW	22 Lloyds Avenue, IP1 3HD	YES	Granted after mediation with the Police.
Co-op - Variation	28 Henning Avenue, IP3 9QJ	NO	Granted as requested.
Love Thy Burger – Variation	38 Westgate Street, IP1 3ED	YES	Granted after mediation with the Police.
Haberds Inn (P J McGuinty's) - Variation	15 Northgate Street, IP1 1BY	YES	Granted after mediation with the Police.
The Swan – Variation	3 King Street, IP1 1EG	YES	Withdrawn before Hearing.

- 21 out of 41 in CIA area

Premises	Address	In CIA Area	Outcome
Convenience Store - NEW	71 St John's Road, IP4 5DE	NO	Granted following mediation with Suffolk Police
Coes - NEW	20 - 28 Norwich Road, IP1 2NH	YES	Granted following mediation with Suffolk Police
Jackies Café & Deli - NEW	3A St Peters Street, IP1 1XF	YES	Granted following mediation with Suffolk Police
Casa De La Musica Café Bar & Restaurant Limited - NEW		YES	Granted with additional conditions proposed by Suffolk Police and reduced licensing hours imposed at Hearing.
Shwarma Bistro Ltd - NEW	59 Westgate Street	YES	Granted following mediation with Suffolk Police
Hopsters - VARIATION	16 St Nicholas Street	YES	Granted following mediation with Suffolk Police
Yates - VARIATION	Trafalgar House, Tower Street	YES	Granted
Mariners - NEW	Neptune Quay	YES	Granted following mediation with Suffolk Police
· _ ·	271-275 Hawthorn Drive	NO	Granted following mediation with Suffolk Police
The Gallery - NEW	4-6 Wherry Quay	YES	Granted following mediation with Suffolk Police and Other Persons.
Larchcroft Trading Company -NEW	33 Knightsdale Road	NO	Granted following mediation with Suffolk Police
Sin Bar – NEW	2 Coachman Court, IP4 1DX	YES	GRANTED – Mediated with Public Health Suffolk, Police and Environmental Health
Home Bargains – NEW	Unit 2A, Suffolk Retail Park, IP1 2EJ	YES	GRANTED - Hearing cancelled following mediation with Public Health.

Premises	Address	In CIA Area	Outcome
Migle Limited - NEW	184 Bramford Lane	Yes	Granted with additional conditions proposed by Suffolk Police and reduced licensing hours imposed at Hearing.
EU Mini Market - NEW	1-3 Barrack Corner	YES	Not Granted
East of England Co-op - VARIATION	17 Garrick Way	NO	Granted following mediation with Suffolk Police
East of England Co-op - VARIATION	247 Hawthorn Drive	NO	Granted following mediation with Suffolk Police
East of England Co-op - VARIATION	28 Henning Avenue	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	64 Queens Way	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	310 Sheldrake Drive	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	19-25 Ulster Avenue	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	51-53 Woodbridge Road	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	335-337 Woodbridge Road	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	217-219 Clapgate Lane	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	65 Colchester Road	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	123 Penhurst Road	NO	Granted after mediation with Suffolk Police
East of England Co-op - VARIATION	24 Selkirk Road	NO	Granted with additional conditions mediated with Suffolk Police

Premises	Address	In CIA Area	Outcome
Iceland – NEW	Unit 2B, Suffolk Retail Park, IP1 2EJ	YES	GRANTED - Hearing cancelled following mediation with Other Persons.
Alexandra Park - NEW		YES	Granted
Bourne Park - NEW		NO	Granted
Holywells Park - NEW		NO	Granted
Chantry Park – VARIATION		NO	Granted
Helenka Ltd	55 St Helens Street	YES	Granted with additional conditions mediated with Suffolk Police and Public Health
Greshams - NEW	312 Tuddenham Road, IP4 3QJ	No	Granted with conditions imposed and amended timings.
Town Hall & Corn Exchange - NEW	King Street, Ipswich	Yes	Granted following mediation with the Police
Aurora - VARIATION	The Tented Building, IP3 0BT	Yes	Application withdrawn
Cock & Pie – VARIATION	13 Upper Brook Street	Yes	Granted
Cardinal Grocery – NEW	27 Franciscan Way, IP1 1LS	Yes	Hearing cancelled. Granted following mediation with Police and Public Health
Casa De La Musica – NEW	59B Wesgate Street, IP1 3DZ	Yes	Hearing cancelled. Granted following mediation with Police
Iceland – NEW	Euro Retail Park	NO	Granted
The Grinning Rat - NEW	66-68 St Helens Street, IP4 2LA	Yes	GRANTED - Hearing cancelled after mediation with the Police and Environmental Health.

- 20 out of 25 in CIA area

Premises	Address	In CIA Area	Outcome
The Range - NEW	Unit 1, Suffolk Retail Park	YES	GRANTED following mediation with Suffolk Constabulary
The Flamy Grill – NEW	74 Cauldwell Hall Road	NO	GRANTED following mediation with Suffolk Constabulary
Pizza GoGo – NEW	366 Nacton Road	NO	GRANTED, with additional conditions and amended timings
The County of Suffolk – VARIATION	29 St Helens Street	YES	GRANTED, with additional conditions and amended timings
The Papaky Coffee Shop - NEW	11 King Street	YES	GRATNED, with additional timings.
McDonalds – VARIATION	Grafton Way	YES	WITHDRAWN, due to Covid-19
EU Supper Market Ltd - NEW	3 Barrack Corner	YES	REFUSED
Swan & Hedgehog – VARIATION	3 King street	YES	GRANTED, with reduced hours for the opening of the outside bar. Agreed with the Police and Environmental Health.
On Fire En Ltd – NEW	12 Tacket Street	YES	GRANTED, Mediated with Suffolk Constabulary and additional conditions added.
Tesco – NEW	52-56 Tavern Street	YES	GRANTED, Mediated with Suffolk Constabulary and additional conditions added.
Ipswich Burger Trading Limited – NEW	Unit 3.9, The Buttermarket	YES	GRANTED, mediated with Suffolk Constabulary and additional conditions added
The Green Room – NEW	18 St Margarets Green, IP1 3BX	YES	GRANTED – Mediated with Suffolk Police

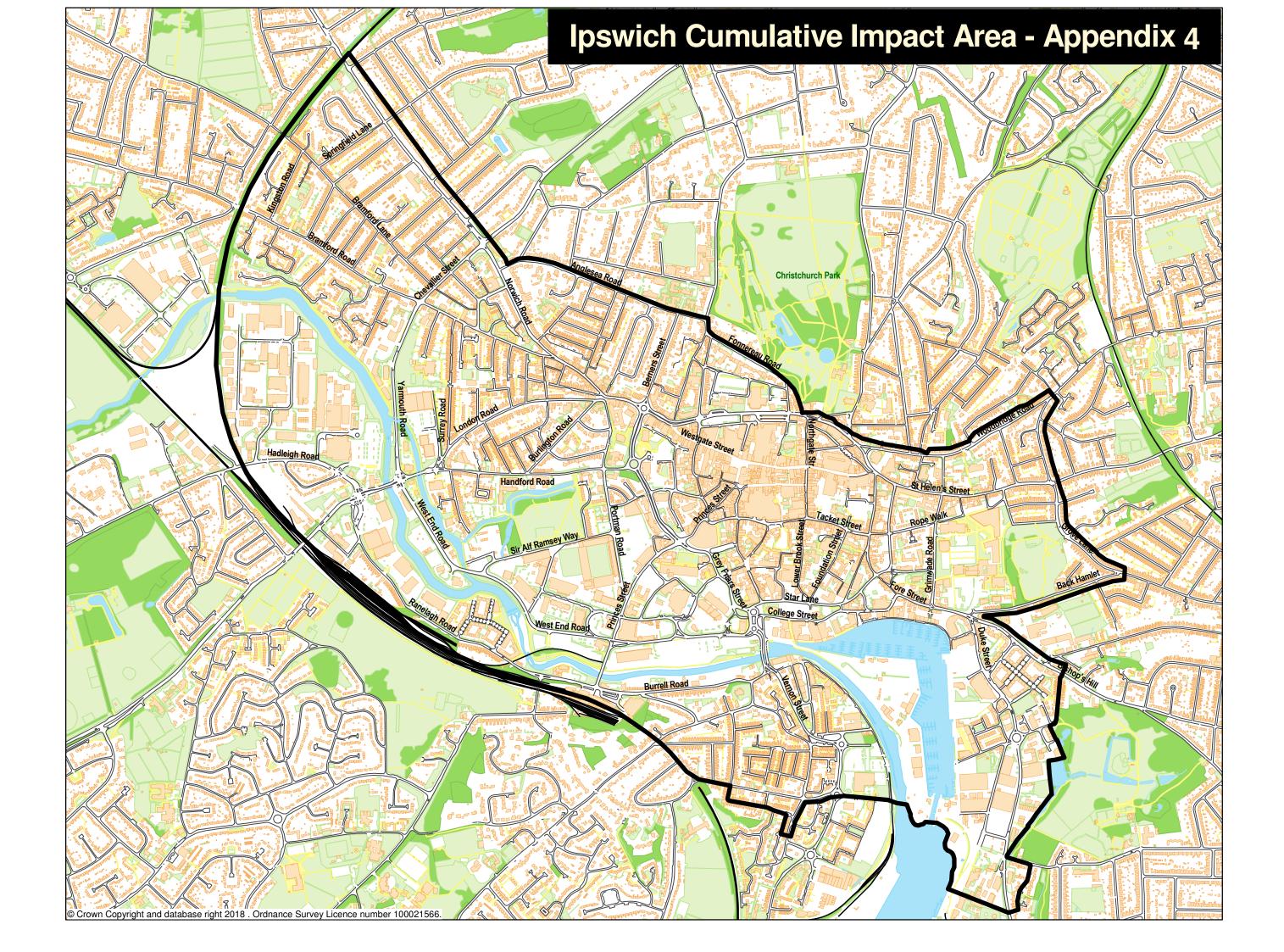
Premises		In CIA Area	Outcome
Unique Taste - NEW	4 Black Horse Walk, IP1 3EB	YES	GRANTED following mediation with Suffolk Constabulary
Eden Crafts Ltd - NEW	Temporary Marquee, Lloyds Avenue, Cornhill	YES	GRANTED following mediation with Suffolk Constabulary
Maxi Poli Ltd - NEW	3-5 St Matthews Street, IP1 3EL	YES	REFUSED following L&R Sub- Committee. Representations received from Suffolk Constabulary and Public Health.
Wildgoose Fine Foods Limited - NEW	17 St Stephens Lane, IP1 1DP	YES	GRANTED following mediation with Suffolk Constabulary
McColl's – NEW	57 Stoke Park Drive, IP2 9TH	NO	GRANTED following mediation with Suffolk Constabulary
Burrito Boys Ltd – NEW	Unit Brookhouse Business Park, IP2 0EF	NO	Application Withdrawn
The Hold - NEW	131 Fore Street, IP4 1LR	YES	GRANTED following mediation with Suffolk Constabulary and Environmental Health
GO EAST IPSWICH - NEW	36 Tacket Street, IP4 1BA	YES	GRANTED following mediation with Suffolk Constabulary
The Bloom Lounge - NEW	34 Tacket Street, IP4 1BA	YES	GRANTED – Mediated with Suffolk Police and Environmental Health.
Makani Café – VARIATION	10a Tacket Street, IP4 1AY	YES	GRANTED – Mediated with Suffolk Police and Environmental Health.
Arlingtons – VARIATION	13 Museum Street, IP1 1HE	YES	GRANTED - Hearing cancelled following mediation with Suffolk Police.

Premises	Address	In CIA Area	Outcome
LIDL - NEW	Plot 1, Crane Boulevard, IP3 9SP	NO	GRANTED – Mediated with Suffolk Police.
Pizza Pronto – NEW	169 Felixstowe Road, IP3 8EB	NO	GRANTED – Mediated with Suffolk Police.

(Up September 2021)- 13 out of 21 in CIA area

Premises	Address	In CIA Area	Outcome
NEW – Nosh Ipswich Ltd	Unit 4, 2 Bixley Road, IP3 8PL	NO	Granted following mediation with Suffolk Constabulary.
NEW – Fire Away	47-49 Upper Brook Street, IP4 1DU	YES	Granted following mediation with Suffolk Constabulary and Public Health.
NEW – Aldi Stores Limited	Europa Way, Sproughton Road, Ipswich	NO	Granted following mediation with
Morrisons - VARIATION	Sproughton Road, IP15AF	NO	GRANTED following mediation with Suffolk Constabulary
Rodi Pizza & Grill - NEW	13 Meredith Road	NO	GRANTED following mediation with Suffolk Constabulary
Good Inside - NEW	16 St Margaret's Green, IP4 2BS	NO	GRANTED following mediation with Suffolk Constabulary and Environmental Health
Bistro on the Quay - NEW	3 Wherry Quay, IP4 1AS	YES	GRANTED following mediation with Suffolk Constabulary
The Moloko Ltd – NEW	8 Lion Street, IP1 1DQ	YES	Granted with conditions added through mediation with Suffolk Constabulary.
Dough & Co - NEW	Unit 2 Cardinal Leisure Park, IP1 1AX	YES	Granted with conditions added through mediation with Suffolk Constabulary.
A Passage to India – NEW	27-31 Fore Street, IP4 1JW	YES	Granted with conditions added through mediation with Suffolk Constabulary.
NEW – Joy Quality Fast food	34 Silent Street, IP1 1TF	YES	Granted with additional conditions added after mediation with Suffolk Constabulary and Public Protection

Premises	Address	In CIA Area	Outcome
Junk Yard Market – NEW	Car Park on Grafton Way	YES	Granted with conditions added through mediation with Suffolk Constabulary.
Bucharest Market - NEW	12 Norwich Road	YES	REFUSED
Little Beans - NEW	37 Foxhall Road	NO	GRANTED following mediation with Suffolk Constabulary.
Harry's One Stop Shop Ltd	7 Heath Road	NO	GRANTED following mediation with Suffolk Constabulary.
The New Wolsey Theatre - VARIATION	Civic Drive, IP1 2AS	YES	Granted with additional conditions added after mediation with Suffolk Constabulary
Oasis Lounge – NEW	Unit 6 Regatta Quay, IP4 1FH	YES	Refused
VARIATION – Morrisions Store & Petrol Filling Station	Boss Hall Road, IP1 5BN	No	Granted
Lunar Bar - NEW	22 Falcon Street, IP1 1SL	YES	Granted with additional conditions following mediation with Suffolk Constabulary and Environmental Protection
Sourdough – NEW	24 Lloyds Avenue, IP1 3HD	YES	Granted with additional conditions following mediation with Suffolk Constabulary.
NEW – The Emerald Lounge		YES	Granted with additional conditions added after mediation with Suffolk Constabulary and Public Protection



Appendix 5 LICENSING ACT 2003 CONTACT DETAILS FOR RESPONSIBLE AUTHORITIES

RESPONSIBLE AUTHORITY	ADDRESS
1. Chief Officer of Police	Chief Officer of Police FAO The Ipswich Licensing Unit Suffolk Constabulary Landmark House 4 Egerton Road Ipswich IP1 5PF PoliceAlcoholLicensing@suffolk.pnn.police.uk
2. Chief Fire Officer	Suffolk Fire & Rescue Service Endeavour House Russell Road Ipswich Suffolk IP1 2DE fire.businesssupport@suffolk.gov.uk
 3. The enforcing authority under the Health & Safety at Work Act 1974. Note: Send a copy of your application to only one of these addresses depending on the type of premises. For the majority, such as pubs, clubs, restaurants, off licences and village halls, this will be the District Council. If the premises are a school or hospital it will be the Health and Safety Executive. If you are not sure which address to send a copy of your application please contact your local council for 	Operations Manager- Public Protection Ipswich Borough Council 3W Grafton House 15-17 Russell Road Ipswich IP1 2DE environmental.health@ipswich.gov.uk Health & Safety Executive Osprey House Hedgerows Business Park Colchester Road Chelmsford
NB. The Maritime and Coastguard Agency (MCA) may also need to be served - The Licensing Team will advise you if this applies to your application.	CM2 5PF mocolchester@mcga.gov.uk Colchester Marine Office Iceni Way Colchester Essex CO2 9BY
The Local Authority exercising Statutory functions to minimise or prevent risk of pollution of the environment.	Operations Manager- Public Protection Ipswich Borough Council environmental.health@ipswich.gov.uk The contact details for the responsible authority at the Council for this purpose are the same as that in 3. above. You need only serve one copy of the relevant documents on Environmental Services.

RESPONSIBLE AUTHORITY	ADDRESS
5. The Local Planning Authority	Operations Manager- Planning and Development Ipswich Borough Council 3W Grafton House 15-17 Russell Road Ipswich IP1 2DE DevelopmentManagement@ipswich.gov.uk
6. Suffolk Safeguarding Children Board (Body responsible for protection of children from harm)	Chief Officer of Police FAO The Ipswich Licensing Unit Suffolk Constabulary This body has delegated its function to Suffolk Constabulary – you need only send one copy of your application form to Suffolk Constabulary.
7. Suffolk Trading Standards (Body responsible for weights and measures)	Suffolk Trading Standards Landmark House 4 Egerton Road Ipswich IP1 5PF tradingstandards@suffolk.gov.uk
8. Public Health	Public Health Suffolk Suffolk County Council 8 Russell Road Ipswich IP1 2BX HealthandWellbeing@suffolk.gov.uk
9. Home Office (Immigration Enforcement)	Home Office (Immigration Enforcement) Alcohol Licensing Team Lunar House 40 Wellesley Road Croydon CR9 2BY Alcohol@homeoffice.gsi.gov.uk
10. The Licensing Authority With effect from 25 April 2012 the Licensing Authority was designated as a Responsible Authority and can make representations in respect of applications etc.	You do not have to serve an additional copy of your application on the council as Licensing Authority. Your original application documents will be used for this purpose. licensing@ipswich.gov.uk

PLEASE RETURN YOUR APPLICATION FORM AND SUPPORTING DOCUMENTS: TO THE LICENSING AUTHORITY:

Licensing & Enforcement Ipswich Borough Council Grafton House, 15-17 Russell Road, Ipswich, IP1 2DE