



Ipswich Borough Council

Housing Delivery Action Plan 2022

Foreword

The Council's Corporate Plan identifies "*building quality and affordable homes for Ipswich people*" as one of three top priorities for the Borough.

The Council has a target of delivering 8,280 new homes by 2036 and is keen to widen the range of homes, in order to improve the prosperity of the town.

The town planning function is a key driver for improving housing delivery, along with the property, housing, and environmental health functions, which together, can bring about a significant positive change to housing delivery in Ipswich.

This Housing Delivery Action Plan describes the challenges facing the Council in terms of housing delivery and sets out a clear path to address them.

We look forward to working with partners in implementing this plan and delivering new homes for the people of Ipswich.



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Ipswich the Place

Ipswich is the county town of Suffolk and performs a regional role in terms of its population, in delivering growth and how it functions as a major employment, shopping and service centre, and hub for transportation. Ipswich was recently named by TripAdvisor as one of the “*up and coming*” urban areas to live.

The town has a well-connected transport network. Train services provide good and regular access to London (in around 60 minutes) and direct links to Norwich, Cambridge and Peterborough. Ipswich is also closely connected to the trunk road network with the A12 providing access to London, the M25 and Stansted Airport and the A14, linking Ipswich to the Midlands and the Port of Felixstowe.

The population of Ipswich is younger than the county, regional and national averages. The largest age group in Ipswich is the 25–34-year-olds (15.9%). In addition, 23.8% are aged 14 or under. Conversely, only 13.3% of the Ipswich population is aged over 65 years. Ipswich’s history is rich as a port and, in recent years, its Waterfront has been transformed to include hotels, the University campus, the Jerwood Dance House, a range of bars and

cafés and high-quality residential apartments.

Ipswich is a compact town. Nowhere is further than 4 miles from the town centre. It is also a town on a human scale, which lends itself to walking and cycling.

Ipswich is developing dynamically and prosperously and has strong prospects for growth. 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 its large landscaped parks.

Christchurch Park provides one of the largest green spaces in any UK urban centre, and together with the numerous other beautiful parks and open spaces, contributes significantly to the setting of the town. Other attractions include the many historic buildings and numerous theatres, with Ipswich enjoying more National Portfolio Organisations (NPOs) than any other location outside of London.

Beyond, Suffolk boasts a splendid rural backdrop, including a renowned coastal region, Dedham Vale and the mid-Suffolk area, with strong links to Gainsborough and Constable Country.

Local Planning in Ipswich

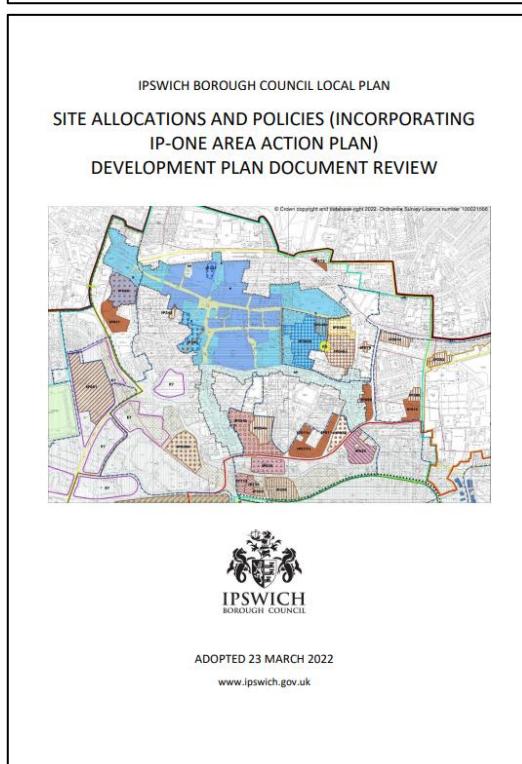
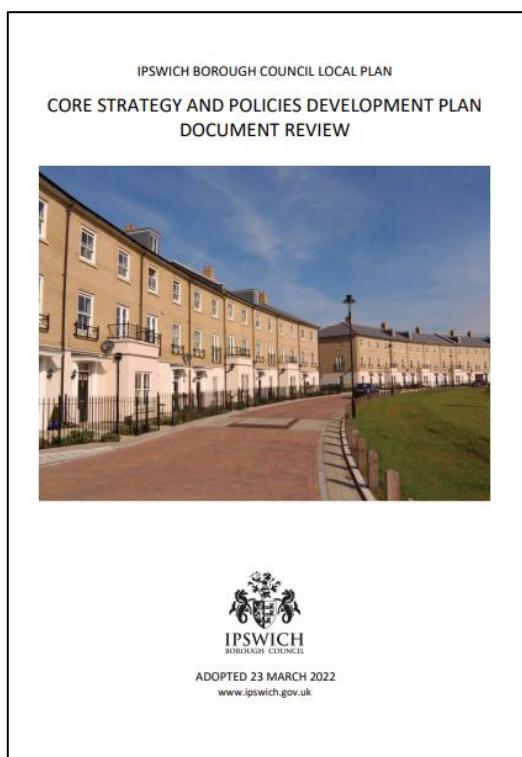
On the 23 March 2022 Ipswich Borough Council adopted its third Local Plan in under ten years. The Local Plan looks forward fifteen years and allocates land for future housing and employment growth, along with planning for infrastructure to support it. The Local Plan also has a function to provide the spatial delivery of all corporate plans and strategies.

With the publication and adoption of the 2022 Ipswich Local Plan on the 23 March 2022 by Full Council, the Borough has a five-year land supply. This is the first time that Borough has had a five-year land supply in twelve years. The newly adopted Ipswich Local Plan also means that the Council has an up-to-date local plan and can meet the Government's requirement for local authorities to have an up-to-date local plan by December 2023.

The Ipswich Local Plan plans the delivery of 8,280 new homes by 2036. This includes around 3,500 new homes at Ipswich Garden Suburb and includes associated infrastructure,

such as a new 24.5ha country park on the northern edge of Ipswich.

Outside of the Ipswich Garden Suburb the focus of new housing is within the central area of the town (IP-One Area).



Housing Delivery in Ipswich

Much of the recent development in the town has been focused around the central area of Ipswich (IP-One Area). Ipswich Waterfront is the location for the largest single regeneration project in the East of England and the focus of significant commercial, cultural and institutional investment.

Whilst Ipswich has seen quality housing delivered across the Borough, the housing market has not delivered the scale of housing needed.

The purpose of this document is to identify what steps the Council needs to take in order to assist with delivering sufficient number and quality of new homes for all. This report examines the current state of play; exploring the challenges and opportunities to build the scale of housing needed in Ipswich.

The Council recognises that it plays a significant role in driving the delivery of new homes. It is committed to making a significant contribution itself both to housing delivery and to the public realm.

The Council has an excellent record of making timely and good decisions. For December 2020 to December 2021, 95% of all planning applications were determined within time. For July 2018 to June 2020 100% of all planning appeals were dismissed. This illustrates the pro-active and positive attitude of the Council.

There are however some things that are beyond the control of the Local Planning Authority, for example the lack of power to properly incentivise the implementation of planning permissions when they are granted. For example, on the 1 April 2022 there were approximately 2,709 dwellings in Ipswich with permission which had not commenced.

The Borough is now entered a delivery phase, prioritising housing delivery over launching straight into the preparation of another Local Plan. This is being assisted through a partnership with Homes England.

Housing Delivery Test

The Housing Delivery Test measures net additional dwellings provided in a local authority area against the homes required to meet local need. The current Housing Delivery Test covers the period between 2018 and 2021.

Where delivery falls below the homes required, policies set out in the National Planning Policy Framework (NPPF) will apply.

The consequences apply concurrently, for example, those who fall below 85% should produce an Action Plan as well as the 20% buffer. The consequences will continue to apply until the subsequent housing delivery test measurement is published the following year.

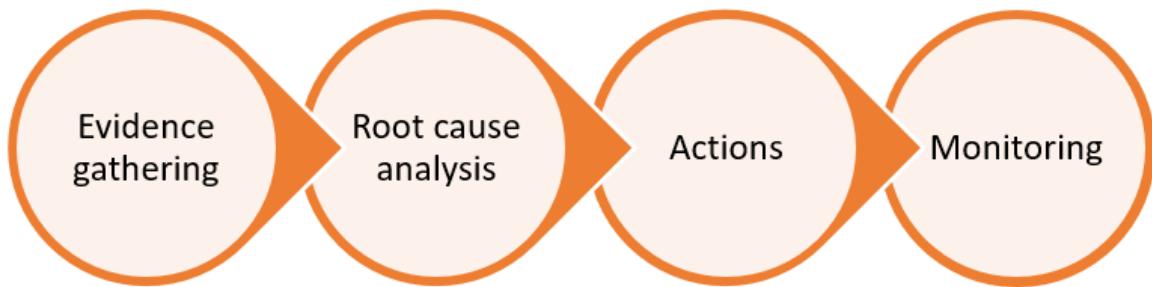
All local planning authorities with less than 95% of the delivery target must prepare an Action Plan.

An Action Plan is intended to be a practical document focussed on effective measures aimed at improving housing delivery in an area and needs to be underpinned by evidence and research.

The 2021 Housing Delivery Test published on 14 January 2022, showed housing delivery at 82% of the requirement in Ipswich between 2018 and 2021 (compared to 64% for the previous three-year period).

This changes the Government's sanction from the 'presumption in favour' to requiring the Council add a 20% buffer to the five-year housing land supply and have an Action Plan in place. The 2022 Ipswich Local Plan has a 20% buffer already incorporated in its supply figures. This means that for the present, the Council is no longer a 'presumption' authority. However, it needs to be remembered that this position is not static and will be reviewed.

Evidence and Root Cause Analysis



The Action Plan process is shown in the diagram above and requires local authorities to understand why delivery in their area is below government expectations.

A range of data sources have been analysed to identify the main local issues and challenges influencing delivery rates. The Action Plan is supported by a background technical paper which collates the relevant data.

Based on the data collected and analysed the Council considers that the main barriers to delivery continue to be:

- The tight, compact urban nature of the borough;
- Higher cost of development and lower land values;

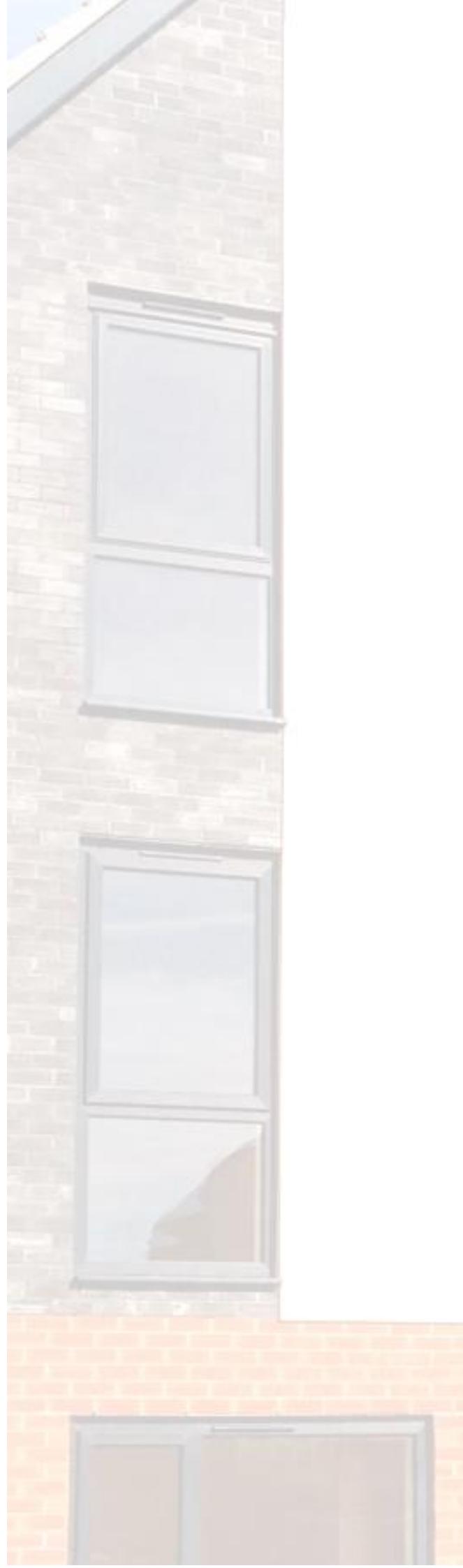
- Low private sector delivery levels of affordable housing;
- The inability of the local planning authority to incentivise delivery of housing, or sanction non-delivery;
- Reliance on brownfield sites; and
- Greenfield sites, which offer fewer constraints, sit outside of Borough boundary.

Key Actions

Through a ‘root cause analysis’ the Council has identified the main local issues and challenges influencing housing delivery rates. These issues have been used as the basis to evolve actions to boost delivery.

The actions have been devised as part of a collaborative process between key stakeholders including senior staff from the Planning, Property, Private Sector Housing, Tenancy Services and Environmental Health service areas.

The actions comprise a range of short, medium and long-term actions, to help provide immediate improvements to delivery, but also help with long-term planning for growth.



1

Support Private Sector Affordable Housing Provision

1. Support Private Sector Affordable Housing Provision

The Council is committed to increasing the delivery of affordable homes in the Borough. It is keen to see the private sector play its parts in meeting affordable housing need.

The Council is progressing a programme of affordable housing and has plans to build 1,000 new homes in a decade. Furthermore, the Council has invested £11 million in improving its existing housing stock. All of the Ipswich Borough Council homes meet the Decent Homes Standard and enhanced Ipswich Standard.

Working with the private sector is key to accelerating the supply of affordable housing in Ipswich. The Council can outline the necessary housing mix and bedroom numbers required for a particular site to best meet local waiting list demand.

Planning officers can highlight sites to housing service colleagues so they can work in partnership with private developers to help better deliver affordable housing. This work is supported through the Ipswich Housing Strategy 2019-2024.

Finally, the Council is committed to ensuring it has the resources in place to deliver affordable homes. The Council will therefore explore the capacity and resource to strengthening its partnership role.

Actions

- **Improve partnership working to ensure better private sector delivery of affordable housing (medium-term).**
 - **Explore capacity and resource to strengthen the enabling role within the Council (ongoing - short to medium-term).**
-

2

Work with Neighbouring Authorities to Deliver New Homes

2. Work with Neighbouring Authorities to Deliver New Homes

The Council recognises that Ipswich is tightly bounded and by working in partnership with its neighbouring authorities (Babergh & Mid Suffolk Councils, East Suffolk Council and Suffolk County Council), it can, in the future, identify land strategically to deliver housing.

The four authorities have a demonstrable history of working together on strategic planning issues through the Ipswich Strategic Planning Area Board (ISPA Board).

Ipswich Borough Council is working collaboratively with East Suffolk Council to masterplan and deliver residential development and associated infrastructure on land at the North of Humber Doucy Lane, on the eastern side of Ipswich. The development will deliver 449 new homes in Ipswich and a further 150 in East Suffolk, with cross boundary infrastructure provision.

The Council is committed to continuing this work with adjoining authorities through the ISPA Board, in order to develop a sustainable approach to housing delivery beyond the Borough boundary.

The Council will continue to work closely with ISPA authorities to deliver housing jointly for the Ipswich Housing Market Area and progress all opportunities collaboratively as necessary.

Action

- **Work with neighbouring authorities to identify strategic sites to bring forward new housing development and associated infrastructure (ongoing).**
-

3

Monitor and Bid for Infrastructure and Housing Funding

3. Monitor and Bid for Infrastructure and Housing Funding

The Council will take advantage of all relevant funding opportunities to support the delivery of new housing and infrastructure to support housing delivery.

The Council recognises that parts of Ipswich have viability issues arising from high and abnormal development costs and may benefit from upfront funding, and/or other funded support to accelerate the release of land for housing. The Council will seek to bid for funding opportunities which provide upfront capital to facilitate the delivery of new homes.

The Council already has a proven track record of securing appropriate investment. In February 2018, Ipswich Borough Council successfully bid for £9.8 million from the Housing Infrastructure Fund (HIF) from Homes England to facilitate the delivery of 3,500 homes at Ipswich Garden Suburb (IGS). IGS is a strategically important site and will contribute significantly (36%) in meeting the Borough's housing need up to 2036.

The HIF funding is being used to deliver new infrastructure at the site, including a 24.5-hectare country park and two bridges across a main railway line.

The Council has a good record with Homes England. Ipswich Borough Council and Homes England are in regular and structured dialogue in relation to a number of stalled and proposed development sites. Currently Ipswich Borough Council and Homes England are jointly identifying where there is alignment between the Borough Council's priorities and Homes England's strategic priorities, framed by a shared aim to increase housing supply going forward. Discussion will include specific funding streams where applicable and available.

In March 2021 Ipswich was successful in its bid for £25 million from the government's Towns Fund. This fund will assist with the delivery of 11 projects planned for Ipswich town centre, including a new pedestrian and cycle bridge at the Waterfront and the restoration of various buildings, including the Old Post Office on the Cornhill. The Strategy will kick start regeneration of key development sites and encourage inward investment.

An indicative programme is set out within paragraph 29 of the Ipswich Town Investment Plan, which can be viewed on the Council's website. The 10 submitted summary business cases have not yet been approved by HM Government. More work to demonstrate value for money is underway. The Borough Council, as accountable body, is in regular contact with civil servants on this matter.

Action

- Continue to bid for infrastructure funding to facilitate the delivery of new homes, with a particular focus on securing funding which provides upfront capital (ongoing).**
-

4

Bringing Empty Homes Back into Use.

4. Bringing Empty Homes Back into Use.

An important part of the Council's wider housing strategy is to tackle long term empty homes.

Increasing the number of empty homes bought back into use increases the overall supply of new housing and reduces blight on neighbourhoods. The Council's empty homes policy aims to reduce the number of long-term empty homes in Ipswich returning homes back into use and discouraging owners from leaving properties empty. The objectives of the policy are to provide advice and assistance to those wishing to bring empty homes back into use and where necessary, use appropriate enforcement action to return the property to use.

The Council has an excellent track record of bringing empty homes back into use and has a dedicated officer responsible for working with the owners of properties left unoccupied for extended periods. Through the Council's empty homes policy, the number of long-term empty homes has fallen from 941 in 2008 to 368 in 2018.

In 2021/22 Ipswich's Private Sector Housing Team assisted in bringing 21 long term empty properties back into use.

The Council's annual target for restoring empty homes back into use is 50. This is 10% of the estimated number of long-term empty properties in Ipswich. Based on previous results, it is expected that the majority (80%) of empty homes will be brought back to use as a result of encouragement letters sent to owners. It is expected that 10% will be brought back into use via grants and 10% via enforcement action.

In previous years the Council has exceed its target for restoring the number of empty homes back into use, increasing the overall supply of new sustainable homes. However, during 2020/21 and 2021/22 there was a decline in the number of empty homes brought back into use due to the Coronavirus pandemic. Officers were unable to visit, and property owners were unable to engage building contractors.

The Borough's performance on empty homes remains exemplar.

Action

- Continue to work with the owners of homes left vacant for extended period in order to meet the Council's annual target of restoring 50 empty homes back into use (ongoing).
-

5

Work with Small and Medium Sized Builders to Facilitate the Delivery of New Homes

5. Work with Small and Medium-Sized Builders (SMEs) to Facilitate the Delivery of New Homes

Approximately one third of all new homes in Ipswich are delivered on smaller sites of between one and ten dwellings. The majority of these sites are developed by small and medium sized developers who play a critical role in helping to meet our housing need.

Small sites are important to the Council's overall housing supply as they typically build out more quickly and provide additional choice in the type and design of housing.

The Council aims to boost opportunities for small and medium sized house builders by providing a dedicated list of small sites (suitable for ten units or less). The small sites register will include details of the site constraints to help reduce the development risks.

The Council's own housing sites will look to make use of small and medium sized local businesses as appropriate, to build out their own smaller development sites.

Action

- **Create small sites register (10 units or less) to promote development opportunities for small and medium sized housebuilders (ongoing - short to medium-term).**
- **Support our Housebuilding Company, Handford Homes, to develop the local construction market to enable local small and medium sized construction firms to bid for the construction of new council housing (ongoing - short to medium-term).**
- **Engage with developers to progress those sites which have consent but have not commenced on site (ongoing – short to medium-term).**

6

Review S106 Procedures for Housing Applications

6. Review Section 106 Procedures for Housing Applications

Section 106 of the Town and Country Planning Act is the Council's preferred approach to securing high-quality mitigation to make proposals acceptable.

The Council recognises the importance of timely negotiation and agreement of developer contributions and is working to reduce the time taken to complete Section 106 Agreements by carrying out preparation of draft agreements alongside planning application processing, thus accelerating the decision making process.

Going forward, the Council will continue to encourage engagement at the pre-application stage (see Action 7) of the planning process so that issues are resolved, and a package of obligations are agreed in principle with the applicant before the planning application is considered. This will provide greater certainty for developers and greater transparency to the local community.

The Council will work to ensure that affordable housing is provided through S106 Agreements to reflect the Council's corporate housing priority.

The Council has prepared a standardised template Section 106 Agreement. The template will be published online so applicants are clear about the documentation they are required to provide as part of the planning application process.

The Council is actively engaging with Suffolk County Council (SCC) on updated an SCC Developers Guide to Infrastructure Contributions in Suffolk. The guide is intended to improve transparency and consistency in planning obligation requirements by providing guidance to developers and all stakeholders involved in the development process.

Finally, the Council is committed to ensuring it has the resources in place to agree, process and monitor planning obligations under (Section 106 Agreements). To this end the Council has recruited a dedicated officer to support the delivery of planning services.

Actions

- Promote early S106 negotiations with the aim of agreeing a package of obligations in principle with the applicant as part of the pre-application discussions (ongoing – short-term).
- Prepare and publish a standardised template Section 106 Agreement (ongoing - short-term).
- Recruit a dedicated officer to support Section 106 Agreement progression and monitoring (complete - short-term).
- Work collaboratively with SCC regarding S106s to progress agreements more quickly and clearly, and to ensure that requested contributions are fully justified and viable (ongoing – short-term).

7

Promote Use of the Pre-applications Service

7. Promote Use of the Pre-applications Service

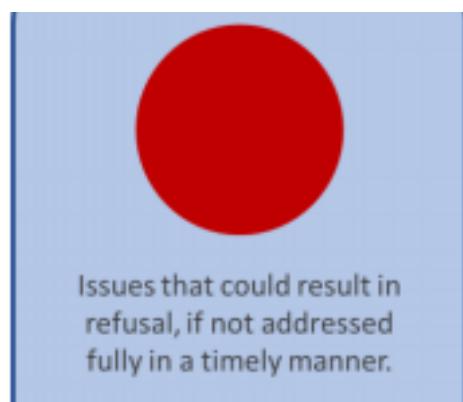
Ipswich Borough Council is committed to improving its pre-application advice process. The main aim is to simplify the process and focus on issues essential to securing planning permission.

The Council is reviewing its pre-application procedures and introducing a traffic light assessment format for pre-application feedback. Issues discussed at pre-application will be rated as red (issues that could result in refusal), amber (issues that require further information or clarification) and green (issues that are resolved or agreed). This enables the main messages to be communicated clearly. The Council will also look to clarify the next stages, creating a clearer route map for applicants.

The greater focus on resolving issues from the beginning will improve the quality of applications. This will also lead to a more efficient and timely application process.

Actions

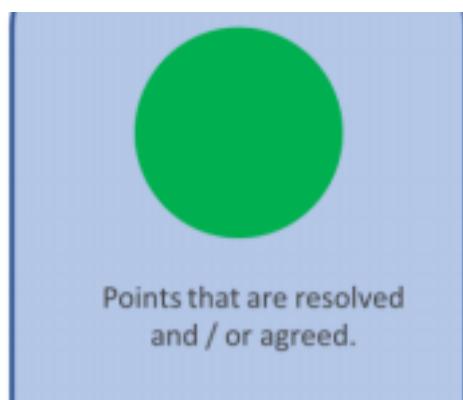
- **Review our pre-application advice process by introducing a traffic light assessment format and creating a clear route map for applicants (complete - short-term).**



Issues that could result in refusal, if not addressed fully in a timely manner.



Issues which require further information or clarification.



Points that are resolved and / or agreed.

8

Review Application Procedures

8. Review Application Procedures

The Council is committed to delivering efficient and high-quality development management services.

The Council has recently acquired work flow software. This technology has helped to increase business efficiency and productivity.

The greater focus on identifying and resolving issues will lead to a more efficient and a timely planning application process.

The Council is currently undertaking a full review of its Local Validation List. In order for applications to be assessed effectively and expeditiously, it is important that local validation requirements are met. Updating the Local Validation List will provide applicants with greater certainty about the application process. Consultation on the draft Local Validation List will take place in September 2022.

It will also improve the quality and detail of application submissions, allowing applications to be assessed effectively, expeditiously and with full transparency.

Actions

- **Review the Local Validation List to enable applications to be assessed effectively and expeditiously (ongoing - short-term).**
 - **Use Enterprise software to increase business efficiency and productivity (complete - short-term).**
-

9

Place Marketing and Promotion to Stimulate and Grow Market Interest

9. Place Marketing and Promotion to Stimulate and Grow Market Interest

There is a need to encourage developers and investors into Ipswich to increase the quantity of housing being delivered.

The Council will undertake a more coordinated and corporate approach to place marketing. Place marketing and promotion will be used to actively promote Ipswich and its key development locations to stimulate market interest and consumer demand.

Place marketing will stress that there has never been a better time to invest in Ipswich. It will set out the unique selling points of the town, including its heritage assets, the Waterfront, the fact that it has a well-connected transport network with train services providing access into London in just over an hour and links to Norwich, Cambridge and Peterborough.

It will emphasise that Ipswich Borough Council is keen to work with housebuilders and developers to deliver the homes required.

Place marketing and promotion will be backed up with continued efforts to de-risk development in less viable locations, through the provision of gap funding and infrastructure investment to remove as many abnormal costs as possible.

Actions

- Investigate opportunities to work with partners to market the town (short-term to medium-term).**
 - Provide an ‘opportunities map’ of key development sites in priority areas for growth (linked to the Local Plan) (short to medium-term).**
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Implementation

The actions comprise a range of short, medium and long-term actions to help provide immediate improvements to delivery, but also help with long-term planning for growth.

Theme	Actions	Timeframe for Implementation
<ul style="list-style-type: none"> ▪ Support Private Sector Affordable Housing Provision 	<ul style="list-style-type: none"> ▪ Improve partnership working to ensure better private sector delivery of affordable housing. 	To be commenced
	<ul style="list-style-type: none"> ▪ Explore capacity and resource to strengthen the enabling role within the Council. 	HE capacity pilot seeks to address this – Ongoing Jan - Dec 2022
<ul style="list-style-type: none"> ▪ Work with Neighbouring Authorities to Deliver New Homes 	<ul style="list-style-type: none"> ▪ Work with neighbouring authorities to identify strategic sites to bring forward new housing development and associated infrastructure. 	Ongoing – supported through ISPA Board
<ul style="list-style-type: none"> ▪ Monitor and Bid for Infrastructure and Housing Funding 	<ul style="list-style-type: none"> ▪ Continue to bid for infrastructure funding to facilitate the delivery of new homes, with a particular focus on securing funding which provides upfront capital. 	Ongoing – supported by HE
<ul style="list-style-type: none"> ▪ Bringing Empty Homes Back into Use. 	<ul style="list-style-type: none"> ▪ Continue to work with the owners of homes left vacant for extended period in order to meet the Council's annual target of restoring 50 	Ongoing – progress slowed due to pandemic

	empty homes back into use.	
▪ Work with Small and Medium-Sized Builders (SMEs) to Facilitate the Delivery of New Homes	<ul style="list-style-type: none"> ▪ Create small sites register (10 units or less) to promote development opportunities for small and medium sized housebuilders. 	Ongoing – work commenced but yet to completed
	<ul style="list-style-type: none"> ▪ Support our Housebuilding Company Handford Homes to develop the local construction market to enable local small and medium sized construction firms to bid for the construction of new council housing. 	Ongoing
	<ul style="list-style-type: none"> ▪ Engage with developers to progress those sites which have consent but have not commenced on site. 	Ongoing – proforma for 5 year land supply delivered and focussed work with HE on market failed sites
▪ Review Section 106 Procedures for Housing Applications	<ul style="list-style-type: none"> ▪ Promote early S106 negotiations with the aim of agreeing a package of obligations in principle with the applicant as part of the pre-application discussions. 	Complete
	<ul style="list-style-type: none"> ▪ Prepare and publish a standardised template Section 106 Agreement. 	Produced but not yet published

	<ul style="list-style-type: none"> ▪ Recruit a dedicated officer to support Section 106 Agreement progression and monitoring. 	Action complete – monitoring officer in post
	<ul style="list-style-type: none"> ▪ Work with SCC regarding S106s to make them quicker and clearer, and that specific contributions are justified. 	Consultation completed – action due to completed by end of summer 2022
▪ Promote Use of the Pre-applications Service	<ul style="list-style-type: none"> ▪ Review our pre-application advice process by introducing a traffic light assessment format and creating a clear route map for applicants. 	Completed
▪ Review Application Procedures	<ul style="list-style-type: none"> ▪ Review the Local Validation List to enable applications to be assessed effectively and expeditiously. 	Ongoing – consultation due to commence in September 2022
	<ul style="list-style-type: none"> ▪ Use Enterprise software to increase business efficiency and productivity. 	Complete – Enterprise software updated, operational from 11 July 2022
▪ Place Marketing and Promotion to Stimulate and Grow Market	<ul style="list-style-type: none"> ▪ Investigate opportunities to work with partners to market the town. 	Yet to commence
	<ul style="list-style-type: none"> ▪ Provide an ‘opportunities map’ of key development sites in priority areas for growth (linked to the Local Plan). 	Yet to commence

The Council is committed to delivering and monitoring the progress on these actions.

Key to implementation table

Ongoing	= Work has commenced
Short-term	= 12 - 18 months
Medium-term	= 19 - 36 months
Long term	= 36 months or more

Monitoring

Council has adopted and embedded a corporate approach to publishing an annual Housing Delivery Action Plan which is designed to drive housing delivery forward and is a material consideration in decision-making.

The actions will continue be implemented and monitored regularly by an officer steering group, comprising staff from the Planning, Property Services, Private Sector Housing, Tenancy Services, Economic Development and Environmental Health teams.

The group meet quarterly to ensure actions are being taken forward in a timely manner. Implementation requires collaboration across the departments, corporate management team and in association with the private sector developers and affordable housing.

The plan and actions will be reviewed and updated annually.



Useful Links

Ipswich Housing Strategy 2019-2024 -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/finalhousing_strategy_-_2019_-_2024.pdf

Adopted 2022 Ipswich Borough Council Local Plan

Core Strategy and Policies Development Plan Document Review -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/core_strategy_and_policies_development_plan_document_7_maps.pdf

Adopted 2022 Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/site_allocations_and_policies_dpd_0.pdf

Strategic Housing and Employment Land Availability Assessment -

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

