

Our ref: Initial Response to the Inspectors
Your ref: Initial Questions to the Council
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18 September 2020

By email via the Programme Officer

Dear Ms. Baker and Mr. Hayden,

**Examination of the Ipswich Local Plan Review 2018-2036
Initial Responses to the Inspectors**

Thank you for your initial letter and request for further information and clarification, we look forward to working with you on the Examination of the Ipswich Local Plan Review 2018-2036. The Council has sought to address the questions in your initial correspondence below. If you have any further questions as you continue the initial reading of the plan, the supporting evidence base and representations please do not hesitate to get in touch and we will respond as soon as possible.

Representations and Main Modifications

- 1. Inspectors question: Firstly, we are grateful for the spreadsheet providing the Council's responses to representations on the publication version of the ILPR, prepared at our request. This will need to be uploaded to the examination website for interested parties to view. The spreadsheet references proposed main modifications (MMs) in response to a number of the representations, set out in the SsoCG. We have been asked by the Council to recommend any modifications necessary to ensure the ILPR is legally compliant or sound. Therefore, we would be grateful if the Council would prepare a separate schedule of proposed MMs for our consideration as part of the examination. This should include MMs identified in the SsoCG and the spreadsheet, and any other changes identified by the Council that materially affect the policies in the ILPR, such as the missing clause in Policy CS10. The Proposed MMs schedule would become a live document, to be added to throughout the examination process.***

Council response: The Council has uploaded the spreadsheet providing its responses to representations on the publication version of the Ipswich Local Plan Review. The spreadsheet is available under the post submission section of the examination library and has the Reference I2. The Council has also prepared a separate schedule of proposed main modifications submitted as a separate attachment to this letter. Please be advised that the spreadsheet does not include main modifications identified through the outstanding Statements of Common Ground. Once the remaining Statements of Common Ground are completed, we will update the main modifications table accordingly.

Topic Papers

2. **Inspectors question:** *We are also grateful for the addendums to the Topic Papers on Economy (D55), Retail (D59), Ipswich Garden Suburb (D57) and Air Quality, Transport and Green Infrastructure (D58), prepared in response to our earlier informal request to incorporate the more recent evidence on these topics in the core documents (CDs), where this has informed the submission version of the ILPR. These should be added to the CDs list in place of the January 2019 versions.*

Council response: The Council has made available the addendums to the Economy, Retail, Ipswich Garden Suburb and Air Quality, Transport and Green Infrastructure Topic Papers under the post submission section of the examination library. The Council was advised by the Programme Officer to upload the topic papers to the post submission section to ensure a clear audit trail. For clarity the Council has also amended the titles of the Jan 2020 topic papers (Core Document Ref D55-D59) to clarify that an updated version of the document is available.

Duty to Co-operate

3. **Inspectors question:** *The CDs include a series of Statements of Common Ground (SsoCG), which are referenced as providing evidence to demonstrate the Council's compliance with the Duty to Co-operate (DtC) in Table 1 of the Statement of Compliance with the DtC (CD A13). Several of the SsoCG were submitted in draft, but were not signed at the point of submission (CDs A23 and A26-29). The explanatory notes to these advise the Council's intention to submit updated versions before the examination hearings. Last week we received signed SsoCG between the Council and the NHS/CCG (A23) and with Babergh and Mid Suffolk Councils (A26) for which we are grateful. These will need to be added to the list of CDs on the Council's website. The Council has previously informally indicated the remaining SsoCG (with Historic England and Suffolk County Council) will be submitted by 11 September 2020, but we would be grateful for formal confirmation from you of when final signed versions of these will be submitted. The important point to make is that the DtC relates to the preparation of the plan up to submission and cannot be rectified postsubmission. We recognise the challenges in securing progress on the outstanding SsoCG following the introduction of COVID-19 restrictions. However, if the outstanding SsoCG are to carry weight as evidence of the DtC, they will need to be signed as an agreed position between the parties of work undertaken up to the submission of the ILPR.*

Council response: The Council has made available the signed East Suffolk and North Essex NHS Foundation Trust and Ipswich and East Suffolk Clinical Commissioning Group and Babergh and Mid Suffolk Council Statements of Common Ground under the post submission section of the examination library. The Council is continuing to progress work on the outstanding Statements of Common Ground with Historic England and Suffolk County Council with a view to submitting final signed versions by 8th October 2020. The Council acknowledge the Inspectors comments regarding the Duty to Cooperate applying to the plan preparation phases and appreciate this point of clarification.

Other Legal Compliance Matters

4. **Inspectors Question:** *Section 19(1) of the Planning and Compulsory Purchase Act (the Act) requires DPDs to be prepared in accordance with the local development scheme (LDS). Given the Council's decision to delay submission of the ILPR due to the COVID-19 restrictions, is there a need for its LDS (CD A15) to be amended to ensure it aligns with the submission date of June 2020?*

Council response: Since the tenth edition of the Ipswich Local Development Scheme was brought into effect in February 2019, the Local Plan timetable has been affected by factors including the December 2019 General Election and the 2020 Coronavirus Pandemic. Therefore, the Council is currently reviewing the Ipswich Local Development Scheme with a view to bringing a revised and updated scheme to its Executive Committee on 6th October 2020 and full Council meeting on 18th November 2020 for adoption.

5. **Inspectors Question:** *The requirements on the availability of documents in Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations) have been amended to take account of current pandemic restrictions. As of 12 August 2020, the need to make the submission documents available for public inspection at the Council's offices has been temporarily removed, relying on their availability via the Council's website. We note the submitted Statement of Community Involvement (SCI)(CD A14) still states that submission documents will be available to view at the Council's offices. Section 19(3) of the Act requires DPDs to be prepared in compliance with the SCI. The Planning Practice Guidance (PPG) encourages authorities to update their SCIs where policies are inconsistent with the latest COVID-19 guidance. Has the SCI been updated accordingly and what steps has the Council taken to ensure sections of the community without access to the internet can continue to be engaged in the examination process?*

Council response: The Council is updating the Statement of Community Involvement (SCI) for Ipswich in order to reflect the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 ('the 2020 Regulations'). The 2020 Regulations came into force on 16th July 2020 (except for regulation 2(2) which came into force on 12th August 2020). The updated SCI is due to be considered for adoption by the Executive on 6th October 2020 and Council on 18th November 2020. The Local Plan was submitted to the Secretary of State on 10th June 2020 before the 2020 Regulations came into force and was publicised in accordance with the 2012 Regulations and the SCI. The adopted SCI March 2018 requires paper copies of the main submission documents to be made available to the public to view at the County Library, the Council's Customer Services Centre at the Town Hall and the Council's offices at Grafton House. The action taken by the Council at submission stage to ensure that sections of the community without access to the internet could continue to be engaged in the examination process was as follows:

- The Notice of Submission of the Local Plan to the Secretary of State under Regulation 22 (Core Document Ref A8) stated that, 'In accordance with Regulation 35(a), the documents are available for inspection by appointment at Grafton House Reception, 15-17 Russell Road, Ipswich, IP1 2DE during normal office hours Mon-Fri 8.30am to 5.00pm. Please ring the planning policy team on 01473 432019 to make an appointment. If you wish to view the

documents but are unable to visit Grafton House or view the documents on-line, you may request from the local planning authority a copy of any of the documents in accordance with Regulation 36. If you are in this position, please contact the planning policy team on 01473 432019 to make alternative arrangements.' The notice was published on the website, in the local press and included with correspondence to all Local Plan mailing list addresses.

- A statement was included on the Council's submission webpage to indicate that, 'If you are unable to access the information via the website, or if you are aware of anyone in these circumstances, please contact the Planning Policy team on 01473 432019 to discuss alternative arrangements.
- When the county library opened to users on 27nd July 2020, a set of the paper documents was delivered to the library.
- When the customer services centre opened to users on 3rd August 2020, a set of paper documents was delivered to the centre for public view.

6. Inspectors Question: *Does the ILPR clearly identify which policies are strategic as required by paragraph 21 of the National Planning Policy Framework (NPPF)? With reference to the same paragraph have any Neighbourhood Plans been 'made' in the Borough?*

Council response: Paragraph 1.2 of the Core Strategy and Development Management Policies Development Plan Document (DPD) outlines the structure of this part of the Local Plan Review. It states that Chapter 8 of the document sets out the strategic policies. This point could be made more explicit by specifically referencing the policies within this chapter (ISPA1 – ISPA4 and CS1 – CS20) by way of a main modification to paragraph 1.2 (see main modifications document).

It is considered that paragraph 1.3 of the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD could be made clearer as to which policies in this part of the Local Plan Review are or are not strategic. This can be addressed by way of a modification to paragraph 1.3 to confirm that none of the policies in this document are strategic (see main modifications document).

No neighbourhood plans have been made in the Borough. The absence of any made neighbourhood plans could be clearly referenced by way of a modification to paragraph 2.5 of the Core Strategy and Development Management Policies DPD (see main modifications document).

7. Inspectors Question: *We note the Council's response to the representation from Bloor Homes on the Sustainability Appraisal (SA), that whilst some of the sites proposed within the ILPR are not in complete alignment with the Spatial Option 1, the spatial strategy in the ILPR follows Option 1 closely. However, the spatial strategy set out in Policy CS2 of the CSP is based on a combination of regeneration in the town centre, Waterfront and Portman Quarters, and sustainable urban extensions (SUEs) at Ipswich Garden Village and Humber Doucy Lane, with more than 50% of the allocated housing proposed at the SUEs, whereas Spatial Option 1 in the SA is based on higher density urban regeneration. Therefore, does the SA provide the necessary justification for the spatial strategy proposed in the ILPR? If not, is further work required, for example, a separate appraisal of the proposed spatial strategy? If so, this could be done as an addendum to the SA.*

Council response: The Sustainability Appraisal (SA) appraised three broad spatial options and in doing so assessed reasonable alternatives to the spatial strategy selected in the Ipswich Local Plan Review. An appraisal of Policy CS2 of the Core Strategy and Policies Development Plan Document was also undertaken as part of the SA. However, the Council accepts that the SA could have been more explicit in also providing a direct appraisal of the spatial option of the ILPR, in line with Policy CS2. Therefore, for completeness and in accordance with the recommendation of the Inspectors, the Council will provide a separate appraisal of the proposed spatial strategy by way of an addendum to the SA. The Council has secured agreement with the consultants, who prepared the SA up to submission; this will be made available on the 30th September 2020.

Infrastructure

8. Inspectors Question: *The Core Strategy contains a suite of policies to secure infrastructure to support the delivery of development proposed in the plan (CS17-CS20). However, other than the Infrastructure Delivery Plan for Ipswich Garden Suburb, we have been unable to find an infrastructure assessment or delivery plan to evidence borough-wide infrastructure needs and how they will be delivered. The Council has indicated it relies on Table 8A of the CSP for evidence on infrastructure and is preparing an Infrastructure SoCG with Suffolk County Council. We are unclear at this stage about the level of detail to be contained in the SoCG, but guidance is set out in the PPG2, which states that evidence should assess the quality and capacity of infrastructure, its ability to meet forecast demands, and how any deficiencies will be addressed. It recommends that strategic policy-making authorities should prepare an Infrastructure Funding Statement when preparing a plan. We would be grateful for your explanation of the evidence prepared to comply with these requirements.*

Council response: The vast majority of the identified infrastructure needed to support the delivery of the development proposed in the Ipswich Local Plan Review (ILPR) has been the subject of consultation with Suffolk County Council (SCC) as the lead delivery body for it together with any other key infrastructure providers. Since the inception of the ILPR process, officers from Ipswich Borough Council (IBC) have engaged with officers from SCC and other key stakeholders to determine the infrastructure needs arising from the level of proposed growth proposed in the Local Plan Review. This has predominantly been by way of email communications and meetings between officers since 2017. IBC has presented the different iterations of the ILPR to SCC as it has evolved through the process. IBC has provided the spatial pattern of development, quantum of development (housing and employment) and other relevant facets of the ILPR to SCC and other key stakeholders, enabling them to determine the required infrastructure needs over the Local Plan period. This is both at the level of strategic infrastructure needs and also development requirements associated with the growth proposed. SCC and other key stakeholders as appropriate, have then informed IBC as to what the infrastructure needs are, and IBC have ensured that the Local Plan Review includes this infrastructure. Table 8A includes “potential funding sources” which establishes how IBC anticipates each piece of infrastructure is likely to be funded.

The strategic transport infrastructure needs arising from the ILPR and other local plans are evidenced by the Ipswich Strategic Planning Area (ISPA) Local Plan Transport Modelling (Core Document Ref D35) which covers the wider ISPA area. All of the ISPA local authorities have provided their respective growth levels and spatial strategies anticipated from each of their Local

Plans which the modelling has used. The SCC Transport Mitigation Strategy for the ISPA (Core Document Ref D39) identifies mitigation needed to address the impacts of growth within or impacting on Ipswich. This document sits under the wider SCC Local Transport Plan. The ISPA authorities are, through joint-working, in the process of establishing the funding mechanisms for delivering the infrastructure needs identified to deliver the actions identified within the Transport Mitigation Strategy for the ISPA.

The Statement of Common Ground (SoCG) that is currently being prepared with SCC regarding infrastructure seeks to update the information in Table 8A to ensure that it is as up to date as it can be for the ILPR examination. For example, where there are currently “and/or” or “TBC” (to be confirmed) references, the SoCG aims to provide clarity on these.

Beyond SCC, IBC has also engaged with other infrastructure providers, for example the Environment Agency and Anglian Water Assets to ensure that both any strategic infrastructure needs or infrastructure arising from proposed development arising from the ILPR are accounted for. These are evidenced by documents such as the Strategic Flood Risk Assessment 2020 (Core Document Ref D30) and the Cross-Boundary Water Cycle Study 2019 (Core Document Ref D31). SoCGs have been entered into with each of these parties.

Notwithstanding the above, it is acknowledged that the documenting of this evidence could be presented in a clearer manner to explicitly identify where it has been sourced. It is considered that an Infrastructure Delivery Plan is the appropriate mechanism to document this. Therefore, whilst the Council is of the view that the infrastructure needs arising from the ILPR have been thoroughly tested and that the infrastructure requirements as set out in the ILPR are sound, it is proposed that the information will be collated into a single Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be available by the 30th September 2020. This will address unit costs to meet both strategic and development infrastructure needs arising from the proposed development.

In terms of the Infrastructure Funding Statement, this is currently being prepared by officers and will be published before the required date of 31 December 2020 for the year 2019/20 – the first year of operation. This Infrastructure Delivery Plan (prepared for the ILPR) will feed into the Infrastructure Funding Statement which is primarily a development management function linked to achievements secured through unilateral undertaking and Section 106 agreements.

The Whole Plan Viability Assessment (Core Document Ref D42) has assessed a mix of different typologies and certain larger sites based on the allocations proposed in the ILPR. As part of this assessment, an output of Section 106 costs per dwelling was included to demonstrate the amounts of Section 106 contributions that are viable to seek depending on the input of other factors (policy costs, affordable housing, land values etc). The assessment identified that, in the majority of scenarios with higher value land, greenfield land and/or house-led developments, Section 106 contributions could be provided that would allow for necessary infrastructure to be funded. However, scenarios that were in the lower value zone, brownfield land and/or flat-led developments demonstrated that expecting Section 106 contributions with other policy costs was more challenging financially. Therefore, Section 106 contributions to fund relevant infrastructure sought on developments that clearly demonstrate that they are unviable will continue to be monitored and reviewed on a case by case basis through the assessment and determination of planning applications.

Housing Requirement and Land Supply

- 9. Inspectors Question:** *We note the contents of the Addendum to the Topic Paper on Reviewing the Ipswich Housing Figure (CD D52), in respect of the latest standard method calculation of local housing need (LHN) for Ipswich and the stepped trajectory. Is the Council now proposing a main modification to Policy CS7 of the CSP to increase the overall housing requirement for Ipswich to 8,280 dwellings for the plan period and the stepped requirement to 540 dpa for the period 2024-2036?*

Council response: We confirm that the Council is now proposing a main modification to Policy CS7 of the Core Strategy and Policies Development Plan Document to increase the overall housing requirement for Ipswich to 8,280 dwellings for the plan period and the stepped requirement to 540 dpa for the period 2024-2036, in order to reflect the most recent affordability ratio data published on 19th March 2020. These changes have been included in the schedule of main modifications attached to this response.

- 10. Inspectors Question:** *What bearing, if any, will the proposed changes to the standard method for assessing LHN, set out in the Government's recent consultation on changes to the planning system (August 2020), have on the housing requirements for Ipswich in the ILPR?*

Council response: The Council considers that the proposals are as yet too uncertain to provide any clear indication of the likely requirement which the Plan would need to provide for. Given that the proposal is that each local planning authority will be given a centrally devised requirement reflective of constraints and (presumably administrative boundaries) with the Duty to Co-operate being abolished, it is difficult to see that there would be any significant issues for the Plan.

- 11. Inspectors Question:** *We note the Housing Trajectory for 1 April 2019 at Appendix 1 to the Topic Paper on reviewing the Ipswich Housing Figure. However, paragraph 73 of the NPPF expects strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period and for plans to set out the expected rate of development for specific sites. Does this require main modifications to Policy CS7 of the CSP and inclusion of the detailed housing trajectory in the Appendices to the CSP?*

Council response: We confirm that a main modification to policy CS7 of the Core Strategy and Policies Development Plan Document (CSP) is proposed in order to comply with paragraph 73 of the NPPF, by adding a graph of the overall expected housing delivery to CSP policy CS7 and the individual site delivery data in a new appendix to the CSP. These changes have been included in the schedule of main modifications attached to this response. To reflect the most up to date position, it is proposed that the graph and the detailed trajectory reflect the delivery position at 1st April 2020 rather than 2019.

- 12. Inspectors Question:** *Does the Housing Trajectory accurately reflect the likely start dates, build out rates and completions for each of the allocated sites? If so what evidence is there to support their deliverability and developability within the timescales set out in the*

trajectory and has the Council agreed SsoCG with site promoters and/or developers in relation to the delivery of each site?

Council response: The Council considers that the housing trajectory reflects the likely start dates, build out rates and completions for the allocated sites. The deliverability of the five-year housing land supply sites is based on National Planning Policy Framework and Planning Practice Guidance definitions and guidance. A detailed up to date schedule will be provided by 30th September 2020.

Approximately 43% of the five-year housing land supply is accounted for by Ipswich Garden Suburb and sites which will be developed by Ipswich Borough Council.

For the Ipswich Garden Suburb (IGS), a Delivery Board, as detailed in the Ipswich Garden Suburb- Supplementary Planning Document 2017, has been established to monitor, co-ordinate and assist where appropriate in the delivery of this strategic site. The first meeting was held on 17th June 2020 as a virtual meeting. The Board is led by the Council's Chief Executive. Its terms of reference are published on the Council's website and set out the purpose and role of the Board as follows:

- To assist and facilitate a co-ordinated approach to the delivery of strategic infrastructure, and to identify any issues that would impede the delivery of such infrastructure which is required to be delivered by specified triggers;
- To assist and facilitate the delivery of a high quality form of development in this garden suburb in accordance with the guidance set out in the IGS SPD;
- To assist and facilitate, where appropriate, securing of external funding to help deliver IGS;
- To assist and facilitate agreement and the delivery of long term management and governance arrangements for the phases of IGS;
- To monitor progress of the delivery of the IGS and inform the Authority Monitoring Report (as detailed in Paragraph 7.32 of the IGS SPD);
- To receive updates from Members of the Delivery Board on progress of the phases of IGS and any engagement with other landowners and those with third party interests;
- To identify and discuss possible solutions to issues which arise that may stall the delivery and progress of the high quality development of IGS.

The Council also has a dedicated officer team which is focusing on the delivery of the strategic housing allocation at Ipswich Garden Suburb.

The first neighbourhood where completions are expected is the Henley Gate neighbourhood north of the railway line. Four Reserved Matters applications (references below) have been submitted for this area, relating to the first phase of housing and infrastructure and the first phase of the country park. These are currently under consideration and will be determined later this year:

- IP/20/00245/REM- Core Infrastructure for Phase 1
- IP/20/00250/REM - Residential parcels for Phase 1
- IP/20/00306/REM- Core Infrastructure for Phase 1B
- IP/20/00417/REM- Phase 1 Country Park

For the second area, Fonnereau, south of the railway line and west of Westerfield Road, the next stage will be the submission of the first Reserved Matters Application and applications to discharge the planning conditions, following the grant of Outline Permission (with all matters reserved) on 31st January 2020 for 815 dwellings alongside community facilities and open space. The planning permission includes time limitations for submission of reserved matters as well as commencement of development.

The third neighbourhood is Red House. Ipswich Borough Council published an Environmental Impact Assessment Scoping Opinion for part of Red House Farm, east of Westerfield Road, on 11th November 2019.

The Council has secured £9,868,351 of funding from Homes England to assist with the delivery of strategic infrastructure at the Garden Suburb namely, the country park and the two bridges over the railway line. Delivery of the infrastructure is time limited to March 2022 and this is secured via the legal agreement with Homes England. We are working closely with Homes England to address the impacts of COVID-19 on the delivery of housing at Ipswich Garden Suburb.

In relation to direct delivery by Ipswich Borough Council on housing sites within the Borough, a New Build Programme for 1,000 Homes was established to ensure that the Council has a stable and long-term supply of housing. The Council has also set up an arm's length development company called Handford Homes Ltd, to deliver affordable and mixed tenure developments on Council-owned land. Resources have been earmarked in the Business Plan, mainly from revenue contributions to deliver the Programme. To date the Programme has delivered 157 homes at Bader Close and schemes at Ainslie Rd, Widgeon Close, Whitton Church Lane, Coltsfoot Avenue, Ulster Avenue and Cauldwell Hall Road. 60 homes are currently being built at Old Norwich Road (former Tooks Bakery site) through the general development agreement with Handford Homes, with planning applications in place for a further forty homes and more sites in the pipeline. A programme of future schemes has been developed to ensure a steady supply of new homes. This will be submitted alongside the other delivery information referred to above by 30th September 2020.

In relation to other sites which form the Council's five-year housing land supply, engagement and evidence gathering is an ongoing process with developers. The Council relies on evidence as to availability which complies with the definitions of deliverable provided nationally. It has not to date sought to agree formal Statements of Common Ground with developers but will review that position. Information will be submitted on 30th September 2020.

13. Inspectors Question: *We are concerned to note that the Topic Paper addendum indicates the ILPR would only just be able to demonstrate a supply of 5 years' worth of deliverable housing sites against the housing requirement with a 20% buffer. What contingency is there for the release of additional housing sites in Ipswich should the delivery of any of the allocated or permitted sites stall during the first 5 years, to avoid a shortfall in the rolling 5 year supply?*

Council response: The Council has built in 10% contingency to the housing land supply as outlined through policy CS7 The Amount of New Housing Required. The first action, should

the five year supply fall short, would be to consider whether sites currently anticipated later in the housing trajectory could be brought forward.

Should there be a need for additional supply, we would look to the Strategic Housing and Economic Land Availability Assessment (SHELAA, Core Document Ref D13 and D13.1). The Council reviewed and updated the SHELAA prior to publishing the most recent iteration in January 2020. Following the completion of the Preferred Options (Regulation 18) consultation on the Local Plan Review in March 2019, officers undertook further site visits of the residential sites outlined in the Preferred Options Local Plan Review. The purpose of the site visits in mid-2019 was to identify and assess whether the capacity for each site was appropriate. The overall impact of this exercise was to increase the capacity across sites by 117 dwellings, mainly by adjusting density assumptions, whilst being mindful of viability evidence. In addition, the Local Plan process enabled four additional site allocations to be identified for the regulation 19 Final Draft Local Plan. At the time of preparation of the Final Draft Local Plan, the Council allocated all the land identified through the SHELAA that was considered suitable, available and viable for development to meet needs and provide for 10% contingency referenced within Policy CS7. In terms of contingency, a further review of the potential identified through the SHELAA would be the starting point, as landowner circumstances and intentions can change at any time.

The Council has also allocated four opportunity sites through policy SP4 of the Site Allocations and Policies Plan. These sites have not been counted towards the housing land supply. They are important regeneration sites but are currently in use with insufficient certainty about when the uses may be relinquished. Together they account for around 554 dwellings. These sites would be reviewed with the landowners in order to explore whether the constraints could be overcome. For example, it may be possible to release part of a site where adjacent uses would be compatible with housing.

The Ipswich Strategy Planning Area (ISPA) Statement of Common Ground (Core Document Ref A21) identifies the process that would be followed, should any local planning authority within the ISPA have unmet need.

Gypsy and Traveller Accommodation

14. Inspectors Question: *Policy CS11 of the CSP identifies a need for 27 additional permanent pitches to meet the gypsy and traveller accommodation needs in the Borough during the Plan period, including a 5 year requirement for 13 permanent pitches. However, the ILPR does not appear to allocate any sites to meet this need. We note the proposed modifications to Policy CS11 in the SsoCG agreed with Babergh and Mid Suffolk Councils, but as amended the policy merely commits the Council to a review within 5 years if progress on finding sites is not made. As it stands we do not consider the ILPR complies with national policy in paragraph 10 of the Planning Policy for Traveller Sites (PPTS). We would be grateful for the Council's comments on how this would be addressed as part of the examination.*

Council response: Ipswich Borough Council is proactively engaged in identifying sites to meet the accommodation need within the borough. The Topic Paper submitted to the Inspectors under core document reference D54, identifies that the 2017 study showed that the local travelling and gypsy community preferred sites for 3 or 4 family pitches. On this basis, the identified sites arising will be too small for local plan allocations. The Council has commissioned RRR Consultancy Ltd to assist them in complying with paragraph 10 of Planning Policy for Traveller Sites (PPTS) 2015.

The consultancy undertook the Accommodation Needs Assessment (2017) and have an excellent working relationship with Gypsies and Travellers in the local area.

RRR Consultancy is assisting with the identification of potential sites including working with the Council, key agencies and families with accommodation need to identify and assess potential sites. They are also determining if the change in status of the local authority site to a privately owned and managed site has impacted on accommodation need and supply. In doing so, the Council are ensuring that any sites meet current accommodation need. RRR Consultancy are also exploring how the needs of transiting households can be met at both local and county level including implementing a negotiated stopping policy. As part of this examination, the findings will be made available on the 8th October 2020.

For your information the Gypsies and Travellers consultant engaged by Ipswich Borough Council is unavailable for the examination hearings on the 15th, 16th and 17th December 2020, due to previous commitments.

New Use Classes Order

15. Inspectors Question: What bearing do the changes to the Use Classes Order, which come into effect on 1 September 2020, have on the soundness of the ILPR? In particular, we refer to policies allocating sites for specific town centre, business and leisure uses, which will come under the new single Class E, and policies seeking to control the mix of uses within town and district centre shopping frontages. How would these changes also affect the ability of the ILPR to deliver the quanta of retail floorspace and employment land required within the plan period in Policies ISPA1, CS10, CS13 and CS14 of the CSP?

Council's Response: The Council has closely reviewed the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, which were made on 20th July and which come into force on 1st September 2020, and the changes which these bring in in relation to the Town and Country Planning (Use Classes) Order 1987. For expedience, the changes are not repeated in this response.

It is pertinent to note that a transitional period exists within the Regulations (covering 1st September 2020 to 31st July 2021) in relation to Permitted Development applications and to Article 4 directions, and transitional arrangements related to applications submitted prior to 1st September 2020, and therefore the existing Use Classes will remain directly relevant to some degree over this period.

In summary, the Council considers that the changes to the Use Classes Order have not affected the soundness of the Ipswich Local Plan Review (ILPR).

In terms of strategic level policies (ISPA1, CS10, CS13 and CS14) of the Core Strategy and Policies Development Plan Document (CSP), the evidence underpinning the policies in the Local Plan relating to retail and employment uses has been drawn up in accordance with national policy as set out in the National Planning Policy Framework (NPPF). Although the changes to the Use Classes Order may enable some changes of use (e.g. retail (A1) to business (B1)) without planning permission, paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of development and to make sufficient provision for (amongst other needs) employment, retail, leisure and other commercial development. This

is reflected in NPPF paragraph 35 which states that, to be positively prepared, and therefore to be 'sound', a Plan should provide a strategy which as a minimum seeks to meet the area's objectively assessed needs. The Local Plan does this by setting out policies to guide and manage employment development and to guide and manage retail development, and in doing so also reflects the requirement in Section 19 of the Planning and Compulsory Purchase Act 2004 to have regard to national policies and advice contained in guidance issued by the Secretary of State and the requirement at Section 20(5)(b) for the plan to be 'sound'.

In terms of ensuring that quantum of retail floorspace and employment land can be delivered, conditions could be attached to any planning permissions on sites allocated for these uses, in accordance with paragraph 55 of the NPPF, where this is necessary to ensure that the development will continue to meet the intentions of the policy (for example, where it will be important for a development to come forward as a retail use in reflection of the policies and the evidenced need for this over the plan period). Conditions could also manage future potential impacts, such as amenity or town centre first considerations, for other potential uses that fall with Class E. The Site Allocations and Policies Development Plan Document allocates land for town centre, business and leisure uses and this is still necessary as a means of delivering the required retail and employment objectively assessed needs of the ILPR. The policies can therefore still be applied in a development management context alongside the amended Use Classes Order.

Consequently, in light of the above, the Council considers that in order for the plan to be sound it must still at least allocate land to meet the Borough's objectively assessed needs for the different types of uses, irrespective of the new use class definitions.

Regarding Policy CS10 specifically, the Fonnereau Neighbourhood (14/00638/OUTFL) and Henley Gate Neighbourhood (16/00608/OUT) planning permissions of the Ipswich Garden Suburb (IGS) were granted on 31 January 2020 and therefore Policy CS10 still has a role to play in terms of agreeing the mix of uses that these will deliver. The Red House element of the IGS is not the subject of a planning application at the time of writing this response. Notwithstanding this, the mix of uses set out in Policy CS10 is still appropriate to achieve the wider sustainability aims and objectives of the IGS in accordance with the previously agreed Masterplan and Supplementary Planning Document for the area.

The Council considers that the following development management policies of the CSP are likely to be affected by the new changes to the use class order, notably the creation of new Class E:

- DM27 (The Central Shopping Area);
- DM28 (Arts, Culture and Tourism);
- DM30 (District and Local Centres);
- DM31 (Town Centre Uses Outside the Central Shopping Area);
- DM32 (Retail Proposals Outside Defined Centres); and
- DM33 (Protection of Employment Land)

As the Use Class Order changes have only just come into force, the Council is still reviewing these policies to determine whether main modifications are necessary. For example, applications for new operational development (rather than changes of use of existing buildings) within Use Class E will still require consideration against relevant policies such as those that require retail impact tests and sequential assessments where appropriate as these are still national policy

requirements under the NPPF. The Council will present any main modifications it believes are necessary as part of any relevant statements for the examination hearings.

Employment use classes B2 and B8 are not directly affected by the changes and it is considered that the existing policies are therefore acceptable in this respect.

The new Classes F1 and F2 effectively cover former use classes D1 and D2 with the exception of those uses that have now been transferred into different use classes (e.g. gymnasiums to Use Class E). Policy DM24 (Protection of Community Facilities) aims to protect community uses which broadly fall under the new Classes F1 and F2 and subsequently this policy will remain effective. Furthermore, the policy includes provisions for the protection of public houses and the change in use of public houses from A4 to 'sui generis', meaning planning permission is required for any change of use of public houses, will strengthen the importance of this policy.

COVID-19

16. Inspectors Question: *We note the Council's COVID-19 Statement (A22). What implications, if any, does the Council anticipate there will be for the strategy and policies of the ILPR as a result of the COVID-19 pandemic? For example, implications for the delivery of site allocations; changes in the geography of employment including increased home working; forecasts of future need for retail and other commercial floorspace; the future mix of uses within centres; open space requirements; and transport infrastructure.*

Council response: It is impossible to predict the full impact of the COVID-19 pandemic, however, the crisis so far has highlighted several key areas of change; an increase in homeworking, a shifting trend to online retail, a need for better active transport, and a need for adequate private amenity space and public open space. Many of these key areas are already being addressed through the Ipswich Local Plan Review (ILPR) policies:

'POLICY CS2: The Location and Nature of Development' outlines the approach that should be taken to achieve the regeneration and sustainable growth of Ipswich. This includes focusing a range of development into the town centre and located in or close to the town's district centres. New retail, office, hotel, cultural and leisure development will be focused on the town centre. Open spaces will be dispersed across the town to create ecological networks and provide accessible green space for leisure activities. The Policy states that '*there will be a town centre first approach to the location of offices*', however future office trends are discussed later in this response and the existing policy wording does not rule out a more flexible approach to office locations.

'POLICY CS5: Improving Accessibility' states that 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 Policy promotes active travel across the Borough and notes that work by the Council '*will prioritise the development of an integrated cycle network.*' The Policy also states that 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.*'

'POLICY CS13: Planning for Jobs Growth' states that the Council '*will promote sustainable economic growth in the Ipswich Strategic Planning Area, with a focus on the delivery of jobs within the Borough.*' This will be achieved through the allocation and protection of an adequate amount and range of employment land, '*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 working with local partners to '*ensure that coordinated action is taken to encourage sustainable economic growth and protect local jobs.*'

'POLICY CS14: Retail Development and Main Town Centre Uses' states that 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.*' This will be achieved by allocating land '*for 10,000 sq.m net of new comparison retail floorspace up to 2031*' and encouraging appropriate retail development in district and local centres. The Policy states that the Council will '*review retail need within five years to ensure that this approach best supports the success of the town centre*'. There should be a much clearer picture of the effect of the COVID-19 pandemic on town centre retail by this time. The Policy also states that the Council will '*promote environmental enhancements and urban greening to the town centre*', to improve access to green space.

'POLICY CS16: Green Infrastructure, Sport and Recreation' states that 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 importance of accessible open green space has been highlighted by the COVID-19 pandemic.

'POLICY CS19: Provision of Health Services' states that the Council will safeguard '*the site of the Heath Road Hospital Campus, which is defined on the policies map, for healthcare and ancillary uses.*' Additionally, proposals for '*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.*' The COVID-19 pandemic has highlighted the pressures on existing facilities and the need to develop further spaces.

'POLICY CS20: Key Transport Proposals' states that the Council '*supports key transport proposals needed to mitigate the traffic impacts within Ipswich of planned growth within the Ipswich Strategic Planning Area*' including the promotion of active travel by enhancing cycling and walking infrastructure across the town.

'POLICY DM6: Provision of New Open Spaces, Sport and Recreation Facilities' requires all new residential developments of 10 dwellings or more (or on sites of 0.5ha or more) to '*provide high-quality open spaces, sport and recreation facilities to meet the needs of their occupiers.*' As previously noted, the importance of accessible open green space has been highlighted by the COVID-19 pandemic.

'POLICY DM7: Provision of Private Outdoor Amenity Space in New and Existing Developments' provides a set of space standards that new development must meet to ensure the delivery of sufficient private outdoor amenity space. Again, the COVID-19 pandemic has highlighted the need for access to adequate outdoor amenity space by all residents.

'POLICY DM16: Extensions to Dwellings and the Provision of Ancillary Buildings' supports the extension of dwellings and provision of ancillary buildings which could provide additional homeworking space subject to the proposals meeting all the necessary policy criteria and not resulting in a loss of amenity for neighbouring properties.

'POLICY DM21: Transport and Access in New Developments' states that developments must '*prioritise available options to enable and support travel on foot, by bicycle or public transport.*' This will encourage active travel across the Borough and reduce car use.

'POLICY DM23: The Density of Residential Development' requires developments to meet the Nationally Described Space Standards to ensure the provision of versatile living spaces, '*unless it can be demonstrated that it would not be viable.*' The COVID-19 pandemic has highlighted the need for adequate living spaces.

'POLICY DM27: The Central Shopping Area' recognises '*that the role of town centres is changing from its traditional retail high street approach*' and this is likely to be accelerated by the current COVID-19 pandemic. The policy states that 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 Policy supports a range of uses in the town centre including A1, A2, A3, A4, A5, B1, C1 and C3. This flexible approach will be key to helping ensure that the town centre can deal with the inevitable effects of COVID-19. The increase in homeworking and move to online retail will present real challenges for the town centre. The Policy promotes a strong mix of uses in order for the town centre to be resilient to changes in certain sectors.

'POLICY DM28: Arts, Culture and Tourism' supports '*the retention and enhancement of existing facilities providing arts, cultural and tourism facilities*'. These areas are likely to be affected by the continuing COVID-19 restrictions and the Policy aims to provide support where possible.

'POLICY DM29: The Evening and Night-time Economy' also supports '*the sustainable growth of Ipswich's evening and night-time economy which will contribute to the vitality of the town centre*'. The Policy promotes evening activities in order to '*maintain a strong and successful town centre vibrancy*'. Measures introduced by Central Government in response to the pandemic recognise that for pubs and bars to survive, outdoor seating areas will need to be extended. The Council is complying with this guidance.

'POLICY DM31: Town Centre Uses Outside the Central Shopping Area' states that within the Town Centre but outside the Central Shopping Area, '*the development of non-retail town centre uses, including leisure, recreation, culture and tourism uses, will be permitted*'. To ensure the vitality and viability of the town centre, the Policy states that '*this area must be considered before edge or out of centre locations for these town centre uses.*' It is likely that the cultural and leisure economy will play a role in the changing face of the UK's town centres as a result of current retail trends and it is likely that COVID-19 will accelerate this process.

'POLICY DM32: Retail Proposals Outside Defined Centres' states that '*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).*' This is to ensure that out of town retail does not negatively impact the town centre.

'POLICY DM34: Delivery and expansion of Digital Communication Networks' states that 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'*, including *'ultrafast broadband, full fibre solutions'*, and supports the expansion of *'electronic communications networks, including next generation mobile technology (such as 5G)'*. This will ensure that residents have sufficient access to networks to meet home working needs, which is even more important since the COVID-19 pandemic.

Retail

The retail policies within the ILPR were written with the understanding that Ipswich is already facing uncertainty with regards to the future of the high street. These existing pressures have been taken into account in the development of the policies which support a flexible approach to town centre uses. It is likely that the COVID-19 pandemic will exacerbate existing issues and a flexible approach will be required to keep up with the changing market trends. The possible effects of COVID-19 on retail in the town centre is explored further in the addendum to the COVID-19 Statement.

Homeworking

It is difficult to predict exactly how the increase in homeworking brought on by the pandemic will affect the demand for office space across the town. Inevitably there will be some kind of return to office working but it may be that this is on a more flexible basis and companies will be reviewing the space that they actually need to accommodate the reduced number of employees in at one time, as well as the location of spaces to better suit employee's needs and reduce the distances they need to travel into work. Mixed use development, including B1 office use, is already supported in the town centre through 'POLICY DM27: The Central Shopping Area'. A note could be added to 'POLICY DM30: District and Local Centres' to make it explicit that the Council would also be supportive of office hubs developing in district and local centres as well as the town centre. The possible effects of COVID-19 on office space demand across the Borough is explored further in the addendum to the COVID-19 Statement. Home working practices requiring the erection of outbuildings and office 'pods' at residential properties will be regulated (when planning permission is required) by the Development Management policies in the ILPR. DM16 specifically allows for ancillary buildings subject to set criteria.

Housebuilding

As part of the COVID-19 Statement produced for submission, the Council undertook a survey of local housebuilders and agents to ascertain the effects of the lockdown restrictions on development across the Borough. The Council will continue to monitor the housebuilding industry and react to changes as they occur. The Planning Policy team also works closely with Development Management to monitor housing delivery in the Borough. The Council has been closely monitoring the development of Ipswich Garden Suburb project which will provide a large proportion of the 5-year housing supply and Ipswich Borough Council (IBC) and Homes England are working closely together on any COVID-19 impacts on delivery. Additionally, the Ipswich Garden Suburb Delivery Board has been set up in line with requirements set out in the Ipswich Garden Suburb Supplementary Planning Document. The possible effects of COVID-19 on housing delivery across the Borough is explored further in the addendum to the COVID-19 Statement.

Summary

IBC has tried to build as much flexibility as possible into the Local Plan Review policies in order to allow a suitable response to changing markets. It is clear that the COVID-19 pandemic is an evolving situation and IBC will continue to monitor changes and react in an appropriate manner. This may result in changes to Policy wording to ensure a sufficiently flexible approach.

Site Allocations

17. Inspectors Question: *Whilst we note that chapter 4 of the SAP and the associated Appendices 3 and 4 follow a similar format to the current adopted local plan, we have a number of concerns about the content of this part of the ILPR, in terms of its clarity and the status of the site information:*

a. Inspectors Question: *What is the status of the Site Allocation Details and Site Sheets in Appendices 3A and 3B? It is not clear whether they constitute policy, explanatory text or information. It is also difficult to distinguish what are development constraints, which should be set out in policy, and what are issues for information.*

Council response: The Site Allocation Details and Site Sheets in Appendices 3A and 3B constitute guidance in support of the SP policies. For the purpose of the review of the Plan it was considered that the general structure of the plan should remain as per the adopted 2017 Ipswich Local Plan. To address the Inspectors concerns regarding the need to clarify what is policy and what are issues for information in the site sheets, it is proposed to set out key individual site related development constraints within the site allocation policies. Additional policy text will be added to the SP policies in order to cross reference between the allocation policies and the guidance contained within the site sheets. The Council will provide a worked-up example for the Inspectors to review by the 30th September 2020.

b. Inspectors Question: *Likewise, the status of the data contained in Tables 1-6 listing the site allocations is unclear. In Tables 1 and 2 it appears to be for information, but in Tables 3-6 is to guide development of the allocations. It also duplicates some of the information in the Site sheets in Appendices 3 and 4.*

Council response: The information contained in Tables 1-6 (Policies SP1 – SP9) constitutes policy. The SP policies set out the Council's approach to the location of specific functions and safeguard land for the uses for which they have been allocated. The purpose of these policies is to meet the Council's specific requirements for the delivery of housing, jobs and retail development up to the period to 2036. The sites are allocations in this plan to enable the targets to be met. The allocated use(s) are carried across into the site sheets, which set out the site-specific details. It is agreed that use of numbered tables separate to the box table above could be interpreted that the table does not form part of the policy. In order to address this the Council proposes to change the formatting to enlarge the boxes to include the tables, so that it is clear that the table is part of the said policy.

c. Inspectors Question: *The site numbering and ordering in Tables 1-6, Policies SP4 and SP8 and Appendix 3 is confusing, as sites are not sequentially numbered and are not*

always listed in ascending site number order (e.g. Table 3 where sites IP004, 043, 051, 119 and 132 appear at the end of the table; likewise sites IP037 and 029 in Table 6).

Council response: The numbering system is based on a site ID system which allows the Council to track the progress of the site from one plan to another, the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the SHELAA update etc. This means that there is continuity across plans and supporting documentation. Therefore, the council would prefer the IP numbers not to change. However, it would be possible to put the site references in numerical order.

- d. Inspectors Question:** *For sites allocated for a mix of uses, separation of those uses into separate land allocation policies and tables, makes it difficult to find all of the information relating to a site (e.g. Site IP037 is identified in Appendix 3B for residential, amenity green space, employment, retail and education, but the employment allocation does not appear in Policy SP5). The complexity of the site numbering does not assist this.*

Council response: The relevant SP allocation policies are listed on the site sheets and the allocation policies cross reference to the site sheets. There is therefore an expectation that someone looking at the SP policy would also look at the relevant site sheet, which set out the specific detail. Where an SP policy has been missed it will be proposed that this is addressed by way of a main modification to the site sheets.

- e. Inspectors Question:** *What is meant by delivery timescales S, M and L in Table 1 Policy SP2 and Table 2 Policy SP3, in terms of during which years of the plan period sites will be delivered?*

Paragraph 16 of the NPPF expects plans to contain policies which are clearly written and unambiguous, so it is evident how the decision maker should react to development proposals. We would invite the Council to consider how the site allocations policies, tables and site sheets could be simplified to comply with this requirement. In particular, we would expect any site specific development constraints, which are to be taken into account by the applicant and decision maker in determining proposals, to be set out in site allocations policies.

Council response: For each site, an estimate of the delivery timetable has been made based on the short, medium or long term (1-5 years, 6-10 years or 11-15 years respectively). This information can be provided by way of a main modification to paragraph 4.8 of Policy SP2 Land Allocated for Housing to clarify what is meant by the delivery timescales S, M and L in Table 1. This change has been included in the schedule of main modifications attached to this response.

IP-One Area Action Plan

- 18. We have some concerns about the clarity and status of chapter 5 of the SAP and the IP-One Opportunity Areas:**

- a. Inspectors Question:** *The title of the SAP suggests that it incorporates an Area Action Plan (AAP) for the IP-One area, but it is unclear whether chapter 5 and Part C constitute*

the AAP or the policies and guidance on which the AAP is to be based. Paragraph 5.1 states that an AAP is needed for this area, but not whether chapter 5 and Part C comprise the AAP.

Council response: The IP-One Area Action Plan was originally intended to be a standalone document, however as the spatial strategy for Ipswich seeks to focus development on central Ipswich and in-particular the IP-One Area, the Council made the decision to incorporate the IP-One Area Action Plan into the Site Allocations and Policies Development Plan Document (DPD). Chapter 5 and Part C of the Site Allocations DPD incorporate the principles of the IP-One Area Action Plan. The key tenets of the Action Plan appear throughout the Site Allocations DPD, including within Chapter 5 and Part C. The evolution of the IP-One Area Action Plan may have contributed to confusion over its status, however this can be clarified by setting out that its principles are incorporated within the Site Allocations and Policies Development Plan Document. For the purposes of this review of the Plan, it was considered that the general structure of the plan should remain as the adopted 2017 plan. Other changes have been made to reflect legislative changes and changes arising from Government Planning Practice Guidance, National Planning Policy Framework revision and recommendations made by consultees where appropriate.

- b. Inspectors Question: *The status of the development opportunities, development principles and supporting text for each Opportunity Area in Part C is unclear. Should the development opportunities and development principles be set out in a policy for each Opportunity Area in the AAP?***

Council response: The Opportunity Areas are clusters of development opportunities which together present an important opportunity to enhance the townscape and public realm and are a hybrid of character areas and development briefs. The Opportunity Area descriptions, development principles and plans act as a concept plan to guide the development strategically that is expected to take place. The Historic England representation to the Regulation 19 Final Draft Ipswich Borough Council Local Plan Review raised similar concerns about this aspect of the Local Plan Review and the Council has been working closely with Historic England to address the issue through a Statement of Common Ground. It is accepted there would be benefit in greater clarity. The Opportunity Areas require a vision for what they were designed to achieve and a summary of the character of each Opportunity Area to explain what makes that area unique. In addition, an additional plan of the Opportunity Areas has been inserted to clarify the link between the Site Allocations and Opportunity Areas. This is being addressed through the draft Statement of Common Ground with Historic England. In response to Historic England's concerns the Council has reviewed the introductory text to Chapter 6 in order to clarify the status of the Opportunity Areas. Going forward the Council wishes to remain flexible in its approach to the development of the Opportunity Areas and is open to alternative proposals for these clusters of development sites. It is signalling that these areas are suitable for development and regeneration, respecting their character. Any key principles which the Council consider should be applied to individual sites can be found within the site allocation sheets in Appendix 3.

- c. Inspectors Question: *There is overlap between Policies SP11-13 for the principal quarters in the IP-One Area, the development options for each Opportunity Area within Part C and the site allocations in Policies SP2-SP9 which relate to sites within these areas. Is it clear***

anywhere in the ILPR how these respective quarters, areas, options and allocations relate to each other?

Again, we would invite the Council to consider how the content of the AAP could be clarified and simplified to comply with expectation of paragraph 16 of the NPPF. As above, we would expect any site specific development constraints to be set out in site allocations policies.

Council response: The general structure and layout of the Final Draft Site Allocations (incorporating IP-One Area Action Plan) Development Plan Document Review remains the same as the adopted Local Plan (2017). The SP policies SP11-13 set out the Council's approach to the location of specific functions within the IP-One Area. Within the Waterfront (SP11) new development should contain a mix of uses. Residential, community, office, arts, culture, open space, boat-related and tourism will be permitted. Within the defined Education Quarter (SP12), development for education and ancillary uses such as student accommodation or offices will be permitted. The Portman Quarter (SP13) is defined on the IP-One Area Inset Policies Map as a focus for regeneration in the west of IP-One. The Council's vision for the Portman Quarter is a mixed-use neighbourhood of residential use, open spaces and main town centre uses, excluding retail. The eight Opportunity Areas, also within the IP-One Area, fulfil a different function identifying opportunities to enhance the townscape and public realm. The Opportunity Areas act as concept plans to guide the development strategically that is expected to take place. SP policies SP2-9 allocate sites for particular uses in order to meet the specific requirements for the delivery of housing, jobs and retail development in the period up to 2036. SP2-9 support the Site Allocation Details (Appendix 3), which set out the site-specific detail. The Council has sought to clarify the status of the Opportunity Areas by reviewed the introductory text to Chapter 6 through the Historic England Statement of Common Ground.

Hearings

19. Inspectors question: We anticipate there will be a need for a number of focussed hearings on the key strategic issues of the plan, site allocations and some of the policies. At present, due to the restrictions on public gatherings under the Government's COVID-19 rules, the Planning Inspectorate is only running hearings as virtual events, where all attendees participate through video conferencing or telephone. From October 2020 it is possible that PINS will start to hold blended events, with a combination of virtual participation, and physical attendance in one or more locations, subject to satisfactory health and safety procedures. It looks likely that the earliest we could hold the hearings in either format would be November 2020, allowing time for the Council to respond to these initial questions and a 6-week notice period for the hearings. But at this stage we would be grateful for the Council's comments on its capacity to host hearings virtually or physically, including which video conferencing platform you can support, whether live streaming of the hearings would be possible and whether there would be venues large enough to hold hearings with physical attendance, whilst complying with COVID-19 rules on social distancing for public gatherings. Even if the Council's preference is to hold them as blended events, we think it would be necessary to ensure the hearings could be held

virtually as a contingency should there be any changes in national or local procedures for the pandemic.

Council response: The Council welcome the prospect of commencing the Examination hearings and believes that it has the capacity to host the hearings virtually.

The Council confirms that it has the technological capability to hold digital hearings should the hearings take place virtually. Our preferred video conferencing platform would be Microsoft Teams, as it offers advanced security capabilities and is both inclusive and accessible. Microsoft Teams meetings can be live streamed via Youtube enabling the public to follow proceedings online. The Council has recently upgraded its Microsoft Teams to include a new meeting feature which allows up to 49 video feeds on the screen at any one time. The Council can also confirm that it is able to provide technological support to aid the smooth running of the Hearings.

The Council has explored the possibility of holding physical Examination Hearings. At present the Council's offices are not open to the public and we have no imminent plans to do so. The Council is currently working on opening its office to staff, but even when this does happen there will be restrictions on capacity. With social distancing the Council's committee rooms will also have limited capacity. Therefore, the Council cannot confirm at this stage that it can hold a physical hearing or hybrid hearing completely safely whilst complying with national guidance on making the space COVID-19 safe. At this time, it is not possible to confirm the risk assessment would be in place and agreed. The Council has looked into alternative venues, including IP-City Centre, an Ipswich Borough Council owned large conference facility. At present this facility is not open and is still undergoing a risk assessment to see if it can open for conference events, it has very limited availability up until the new year owing to outstanding commitments.

At this stage the Council's preference would be to hold the hearings as wholly virtual events however we will be led by government guidance and the Inspectors.

Inspectors additional question: *We note the from the SoCG with the Environment Agency (EA), that the EA has raised an unsound representation on flood risk grounds on the basis that the SFRA is not a reliable evidence base for fluvial flood risk to inform the ILPR, because the modelling for the River Gipping has not been finalised. We would be grateful for confirmation from the Council on when the model outputs for the River Gipping will be available and the SFRA updated accordingly to reflect this?*

Council response: The Environment Agency has released the Gipping Model data to the Council's consultants to enable the Strategic Flood Risk Assessment (SFRA) work to be updated. The updated SFRA will be made available on the 30th September 2020.

We welcome your further correspondence and the opportunity to work with you.

Yours sincerely,



Martyn Fulcher
Head of Development
Ipswich Borough Council