

**Examination of the
Ipswich Borough Council
Local Plan Review 2018-2036**

**MATTERS, ISSUES AND QUESTIONS
FOR THE EXAMINATION (MIQs)**

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Introduction

The purpose of this independent Examination of the Ipswich Local Plan Review (ILPR) is to determine whether the Plan:

- has been prepared in accordance with the Duty to Co-operate and the legal and procedural requirements in the Planning and Compulsory Purchase Act 2004 (the PCPA 2004) and the Town and Country Planning (Local Plan) (England) Regulations 2012 (the 2012 Regulations); and
- is sound, as defined in paragraph 35 of the National Planning Policy Framework (the NPPF).

The ILPR comprises two parts – the Ipswich Local Plan Core Strategy and Policies Development Plan Document (DPD) Review – Final Draft (the CSP) and the Ipswich Local Plan Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review – Final Draft (the SAP).

Hearing sessions have been arranged to enable discussion of the matters, issues and questions (MIQs) for the Examination based on our initial reading of the ILPR, the evidence base and the representations. The Hearing sessions have been structured to deal with legal and procedural compliance issues, development needs and the spatial strategy first, followed by the proposed site allocations and the other policy matters in the ILPR. The MIQs have been prepared to follow that structure, examining the ILPR as a whole, rather than as two separate plans.

The Hearing sessions are due to commence on 24 November 2020 and are programmed to run for 3 weeks until 18 December 2020. A timetable for matters to be discussed on each day is set out in the *Hearing Programme*.

The MIQs should also be read alongside the *Examination Guidance Notes* which contain information on the Hearing procedure, what you will need to do if you wish to participate and the format of any Hearing statements.

Document References in [square brackets] are to the Examination Library List which can be viewed on the Examination webpage or obtained from the Programme Officer.

Other Abbreviations: AAP – Area Action Plan; DPD – Development Plan Document; HLS – Housing Land Supply; HMA – Housing Market Area; HRA – Habitat Regulations Assessment; ISPA – Ipswich Strategic Planning Area; LDS – Local Development Scheme; LHN – Local Housing Needs; MHCLG – Ministry for Housing, Communities and Local Government; PPG – Planning Practice Guidance; SA – Sustainability Appraisal; SCI – Statement of Community Involvement; SHELAA – Strategic Housing and Employment Land Availability Assessment; SHMA – Strategic Housing Market Assessment; SFRA – Strategic Flood Risk Assessment; SUE – Sustainable Urban Extension.

Matter 1 - Duty to Co-operate and Legal Compliance

Issue 1a: Whether the Council has complied with the Duty to Co-operate (DtC) in preparing the ILPR?¹

Questions

1. How has the Council engaged constructively, actively and on an ongoing basis with all of the relevant authorities and prescribed bodies on the 'strategic matters' applicable to the ILPR?
2. How has this engagement maximised the effectiveness of the preparation of the ILPR?
3. Have the 'strategic matters' been resolved through the DtC or do any remain outstanding?
4. Is this adequately evidenced by the Statement of Compliance with the DtC² and the related Statements of Common Ground (SsoCG) and other documents submitted in support of them?
5. Are there any 'strategic matters' on which the DtC has not been met? If so, what is the evidence to support this?

Issue 1b: Whether the Council has complied in all other respects with the legal and procedural requirements in preparing the ILPR, as defined in Part 2 of the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Conservation of Habitats and Species Regulations 2010 (as amended)?

Questions

LDS

6. Has the ILPR been prepared in accordance with the Council's Local Development Scheme? Are there any obvious omissions, in terms of policies or allocations, from the submitted DPDs?

SCI and Consultation

7. Has consultation on the ILPR been undertaken in accordance with the Council's adopted Statement of Community Involvement and the minimum consultation requirements in the Regulations³? What evidence is there that representations submitted in response to the Draft Local Plan have been taken into account as required by Regulation 18(3)?

Sustainability Appraisal

8. Has the formulation of the ILPR been based on a sound process of sustainability appraisal (SA), as set out in the SA Report of the Final Draft of the ILPR, dated October 2019 [A4], and the SA Addenda, dated June 2020 [A5] and October 2020 [I13]? In particular:
 - a. Does the SA test the Plan against reasonable alternatives, in terms of its overall strategy for growth and development, site allocations and policies?

¹ Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)

² Core Document A13

³ Regulations 18 and 19 of Town and Country Planning (Local Planning) (England) Regulations 2012

- b. Has the SA been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?
- c. Is the SA decision making and scoring robust, justified and transparent?
- d. Has the Council provided clear reasons for not selecting reasonable alternatives?
- e. Is it clear how the SA has influenced the ILPR strategy, policies and proposals and how mitigation measures have been taken account of?
- f. Have the requirements for Strategic Environmental Assessment been met, including in respect of the cumulative impacts of the plan?

Habitats Regulations Assessment

- 9. Is the ILPR legally compliant with respect to the Habitats Regulations⁴ and Habitats Directive, as interpreted by recent case law⁵, and any requirement for appropriate assessment? Do the Habitats Regulations Assessment (HRA), January 2020 (A6) and HRA Addendum, May 2020 (A7) ensure compliance? Are further main modifications to the ILPR necessary to ensure it would not have any likely significant impacts in the light of the HRA?

Climate Change Policies

- 10. Does the ILPR, taken as a whole, include policies designed to ensure that the development and use of land in Ipswich Borough contributes to the mitigation of, and adaptation to, climate change in accordance with Regulations⁶?

Health Impact Assessment

- 11. Is the Health Impact Assessment [A9] of the Plan robust? Does it demonstrate whether the ILPR would have an overall positive effect on health and wellbeing in the Borough? Is any further mitigation of health effects required?

Equality Impact Assessment

- 12. Is the Equality Impact Assessment [A12] of the Plan robust? Does it demonstrate whether the policies and allocations of the ILPR would have any negative effects on people with protected characteristics in Ipswich? Are further mitigation measures required?

Superseded Policies

- 13. Does the ILPR make it clear, as required by Part 4, paragraph 8(5) of the Regulations, which policies of the adopted development plan it will supersede?

⁴ Conservation of Habitats and Species Regulations 2010 (as amended)

⁵ People over Wind & Sweetman v Coillte Teoranta C-323/17

⁶ Section 19(A) of the Planning and Compulsory Purchase Act 2004 (as amended)

Matter 2 – Spatial Strategy

Issue: Whether the spatial strategy of the ILPR has been positively prepared, is justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will enable the delivery of sustainable development in accordance with national policy?

Questions

Overall spatial distribution of development

14. Does the spatial strategy in the ILPR enable Ipswich to fulfil its strategic role in the growth and sustainable development of the ISPA, with particular reference to the Objectives and Policies ISPA1-4 and CS2 of the CSP?
15. Is Policy CS1 necessary and does it serve a clear purpose or does it duplicate the policies in the NPPF on sustainable development and decision-making? Is the policy consistent with the objectives and presumption in favour of sustainable development set out in paragraphs 8 and 11 of the NPPF?
16. Is the spatial strategy for the location and nature of development in Ipswich, set out in Policy CS2, justified as the most appropriate strategy for the sustainable development of Ipswich, when considered against the reasonable alternatives? What alternative strategies were considered by the Council in terms of the options for the spatial distribution of development and why were these rejected?
17. Is the reliance on two large scale developments at Ipswich Garden Suburb and Humber Doucy Lane to deliver half of the housing requirement for Ipswich, justified as the most appropriate way of achieving sustainable development, the supply of new homes and the growth of the city? If not, what are the alternatives?
18. Is the approach to densities set out in Policy CS2 justified and effective? Does the ILPR make it clear what is meant by high, medium and low development densities in terms of non-residential uses across the Borough? Do the changes to Policy CS2 proposed in the Schedule of Proposed MMs provide adequate clarity?

Flood Risk

19. Does the spatial strategy of the ILPR comply with national policy on planning and flood risk? In particular:
 - a) Has it been informed by a strategic flood risk assessment (SFRA), based on the most up to date flood risk data and climate change allowances, and taking account of the advice of the Environment Agency?
 - b) Should the boundaries of Flood Risk Zones 2 and 3, as shown on Plan 2, be added to the Policies Map to provide clarity on development constraints within allocated sites and opportunity areas?
 - c) Should Plan 2 be modified to make clear that it relates to fluvial and tidal flooding and that the boundaries to the zones are indicative, but that EA Flood Maps provide the definitive record for determining whether a site lies within Zones 2 and 3?
 - d) Given that the number of housing allocations which are located in Flood Risk Zones 2 and 3, does the ILPR meet the requirements of the sequential test,

as set out in the NPPF, in avoiding inappropriate development in the areas at highest risk of flooding and steering new development to areas with the lowest risk of flooding?

- e) Should sites at less risk of flooding, including those outside of the Borough, be preferred for the development of more vulnerable uses, such as housing?
- f) If it is not possible for development to be located in zones at lower risk of flooding, either within or outside of the Borough, do the policies of the ILPR effectively apply the exception test, as set out in paragraphs 160 and 161 of the NPPF, to ensure that development would be safe for its lifetime and that the wider sustainability benefits would outweigh the flood risks?
- g) Are the criteria in Policy DM4 sufficiently comprehensive in identifying the type and design of development, which will be acceptable in areas susceptible to different forms of flooding, including surface water flooding? Will it be evident how a decision maker should react to development proposals within such areas?
- h) Is Policy CS18 effective in helping to secure further strategic flood defence infrastructure to support the regeneration of the city and is it evident how a decision maker should apply it to development proposals?

Transport Capacity

- 20. Is the spatial strategy and location of growth in the ILPR justified and consistent with national policy, in respect of the modelling of its effects on the operation of the highway network and its potential to minimise the need to travel and maximise journeys by sustainable modes of transport?
- 21. What evidence is there to demonstrate that the combination of transport measures identified in Policies ISPA2 and CS20 and Tables 8A and 8B of the CSP would be effective in mitigating the traffic impacts of planned growth in Ipswich and that the necessary funding is confirmed to ensure their delivery within the plan period?
- 22. Is Policy CS20 justified and effective in respect of the Key Transport Proposals?
- 23. Given the Council's agreement, in the SsoCG with East Suffolk and Babergh and Mid Suffolk Councils, to modify Policy ISPA2 and the supporting text to Policy CS20 to remove reference to the Ipswich Northern Route, is it appropriate for paragraph 8.19 of the supporting text to Policy ISPA2 to continue to support a Northern Route to enable longer term growth within the strategic planning area?

Air Quality

- 24. Is the spatial strategy and location of growth in the ILPR justified and consistent with national policy in respect of its consideration of the impact of development proposals on the air quality in Ipswich?
- 25. Does the ILPR contribute towards compliance with limit values and national objectives for pollutants and take opportunities to improve air quality or mitigate impacts of development on air quality? If so, how?
- 26. Objective 5 of the Local Plan, in chapter 6 of the CSP, states that 'every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels'. How does the ILPR seek to achieve this?

Environmental Capacity

27. Is the strategic balance between development and the protection of the natural environment and heritage assets provided for through Policies ISPA3 and CS4 appropriate and justified?
28. Is the proposed Minor change to Policy CS4 to correct the terminology for the Draft South-East Inshore Marine Plan and East Inshore Marine Plan and East Offshore Marine Plan necessary?

Infrastructure

29. Does objective 10 require modification to reflect the need to improve existing infrastructure as well as provide new infrastructure to meet increased demand from growth?
30. Is the ILPR effective in the provision of infrastructure and local services to meet future development needs? In particular:
 - a) Are the strategic infrastructure priorities and schemes identified in Policy ISPA2, Policy CS17 and Table 8A comprehensive and up to date, sufficient and justified as necessary to support the development needs of the plan, and deliverable over the Plan period?
 - b) Are there any types of infrastructure or schemes which may be required to support future needs missing?
 - c) Would the ILPR provide improved infrastructure and services to promote sustainable growth?
31. Is the list of strategic and neighbourhood infrastructure requirements for the IGS in Table 8B complete?
32. Is the requirement in Policy CS19 to locate additional, new, extended or relocated local health facilities in or adjacent to the town, district or local centres justified, effective and consistent with national policy? Is the policy justified and unambiguous in requiring applicants to demonstrate 'to the Council's satisfaction' that new local health facilities not in town, district or local centres would be fully accessible?

Viability and Deliverability

33. Does the evidence on viability and infrastructure demonstrate that the proposed development strategy of the ILPR, which relies heavily on brownfield site allocations, can viably deliver the housing, commercial floorspace and infrastructure required to support the growth proposed?
34. Is there capacity in the local housing market and housebuilding industry to support the scale and rate of housing growth committed and planned, especially at the SUEs?

Matter 3 – Housing Provision

Issue: Has the ILPR been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for housing?

Questions

Housing Requirement

35. Should the housing requirement in Policy CS7 be increased to at least 8,280 dwellings or 460 dwellings per annum (dpa), in line with the recent change to the standard method calculation of local housing need (LHN)?
36. On what basis does the Council consider, in paragraph 8.106 of the CSP, that it should not plan for a higher level of housing need than the standard method LHN suggests? Given the strategic role of Ipswich in the Ipswich Economic Area, should the Council be planning for a higher figure to provide an uplift to support economic growth?
37. Has the Council been asked if it can accommodate any unmet housing needs from other LPA areas within the HMA?
38. Is the proposal in Policy CS7 (as amended in the Schedule of Proposed Main Modifications) to step the housing requirement from 300dpa between 01/04/18 and 31/03/24 to 540dpa between 01/04/24 and 31/03/36 justified, particularly in light of the recent record of under delivery in Ipswich revealed in the Housing Delivery Test 2019 measurement?

Housing Land Supply

39. Do the Council's assumptions for a 10% slippage in the delivery of housing from sites with planning permission or with resolutions to grant subject to a S106 agreement make reasonable allowance for the non-implementation of permissions?
40. On what basis do Policy CS7 and Table 4 include an allowance for windfall sites in the housing supply of 50dpa between 2022 and 2036? Is there compelling evidence that they will provide a reliable source of supply in accordance with paragraph 70 of the NPPF?
41. What assumptions have been made to inform the trajectory for the delivery of housing sites, in terms of lead in times for grant of full planning permission, outline and reserved matters, and conditions discharge; site opening up and preparation; dwelling build out rates; and number of sales outlets?
42. Overall does the Plan allocate sufficient land to ensure the housing requirement of the Borough will be met over Plan period, in particular from 2031 onwards?
43. What evidence is there that the four unallocated housing sites within the IP-One Opportunity Areas identified in Policy SP4 are likely to be available to deliver any housing to boost the supply within the Plan period?
44. In accordance with paragraph 68(a) of the NPPF, would at least 10% of the housing requirement be accommodated on sites no larger than 1ha or is there evidence to demonstrate why this 10% target cannot be achieved?

5 year housing land supply

45. Would the Council be able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the Plan period?
46. The Topic Paper on Reviewing Ipswich Housing Figure [D52] calculates the supply of deliverable sites in the Plan is 5.09 years of the annual housing requirement for the first 5 years of the Plan period. Is there a need for and are there any additional sites which could contribute to the first 5 years' supply post adoption should delivery of any of the allocated sites stall in the first 5 years?
47. Alternatively, should the proposed stepping of the housing requirement be revisited to reflect the anticipated trajectory in the delivery of housing sites over the plan period?
48. If we were to conclude that a 5-year supply of specific, deliverable housing sites would not exist on adoption, what would be the most appropriate way forward for the Plan?

Gypsy and Traveller Accommodation

49. How does the updated evidence on the need for and supply of accommodation for Gypsies and Travellers set out in the Response from RRR Consultancy [I21] compare with the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment [D17] In particular, where have the 6 additional pitches been created and how have the accommodation needs of the 6 families who have moved off site been met?
50. In the absence of the allocation of any new gypsy and traveller accommodation sites within the ILPR, how and where will the need for additional permanent pitches required from 2021-2026 be met within the Borough during the Plan period, to ensure compliance with paragraph 10 of the PPTS?
51. Should the Council look to identify smaller sites now, rather than leaving it to 'normal development management functions' as proposed in the amended Policy CS11?
52. Would the modifications proposed by the Council to Policy CS11, to allow flexibility in addressing the need for short stay stopping sites within Suffolk, ensure the appropriate provision is made within the Plan period?

Affordable Housing

53. Is the requirement in Policy CS12 for at least 15% affordable housing on sites of 15 dwellings or more justified by the evidence on affordable housing need and viability and would it be deliverable on brownfield sites in particular, taking account of the full range of development and policy costs?
54. Given the evidence on the need for and projected supply of affordable housing, summarised in the Affordable Housing Topic Paper [D53], does the ILPR make sufficient provision for affordable housing to meet needs in the Borough to 2036? If not, how will the need for affordable homes in the Borough be met?

55. Is Policy CS12 consistent with national policy in respect of the definition of affordable housing and the range of affordable housing tenures it includes?
56. Should Policy CS17 include affordable housing as a broad category of infrastructure to be secured or financed from new developments, given that reference is made to the provision of affordable housing in para. 8.215?

Housing Type and Tenure

57. Is Policy CS8 sufficiently clear in respect of the required mix of dwelling type and tenure? Does it defer important policy matters guiding the mix of housing types and sizes required in Ipswich to supporting or supplementary documents, such as the SHMA and the Affordable Housing Position Statement? Having regard to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 should these matters be included in the Local Plan?
58. Are the proposed housing allocations in the ILPR likely to deliver the type and mix of homes identified in the SHMA Update report [D16], given the number and proportion of smaller dwellings to be provided at high densities on sites within the IP-One Area and urban area?
59. Is Policy CS8 consistent with national policy in respect of the provision of Self Build and Custom Build dwellings?
60. Does the Local Plan make adequate provision to meet the needs of the elderly population?

Density of Residential Development

61. Is the approach to minimum and average densities for residential development in Policy DM23 justified, effective and consistent with national policy?
62. What is the evidence to support the minimum higher and medium density figures of 90 and 45 dph set out in Policy DM23?
63. How would the 'average' densities in criteria b and c of Policy DM23 be ensured across multiple sites and allocations?

Matter 4 – Employment and Business Growth

Issue: Has the ILPR been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for employment and business needs for the period 2018-2036?

Questions:

Employment land need and supply

64. Is the proposed minimum quantum of provision of 23.2 ha of employment land for B1-B8 uses, in Policies ISPA1 and CS13 of the CSP, justified in the light of the reduction in the forecast of additional jobs from 15,577 to 9,318 over the Plan period 2018-36?
65. Is the level of provision consistent with the role of Ipswich in the IEA and the existing supply of employment land commitments in Ipswich? Is it sufficiently ambitious in the light of the LEP Growth Strategy/Plan?
66. What bearing, if any, might changes in the forecasts of economic and employment growth due to the COVID-19 pandemic have on the Plan's overall requirement for business, industrial and warehousing employment uses?
67. What effect will the changes to the Use Classes Order (UCO) which came into effect on 1 September 2020 have on the ability to plan for the required number of jobs in sectors covered by the former B1 Use Class? Does Policy CS13 or its reasoned justification need to be modified to reflect the changes to the UCO?

Protection of Employment Land

68. Is Policy DM33 justified, effective and consistent with national policy in respect of the protection of employment land? Does it provide sufficient flexibility to allow for redevelopment or change of use of business floorspace no longer required for this purpose, particularly to allow for potential changes to the geography of employment following the COVID-19 pandemic? Does the policy or its reasoned justification need to be modified to reflect the changes to the UCO which came into effect on 1 September 2020?

Matter 5 – Retail Development and Centres

Issue: Has the ILPR been positively prepared and is it justified, effective and consistent with national policy in respect of its strategy and policies for retail and other town centre development in Ipswich for the period 2018-2036?

Questions:

69. Does the ILPR make adequate provision to meet the future retail floorspace needs of Ipswich in the period up to 2036? Would the proposed site allocations for retail development in Policy SP10 of the SAP meet those needs?
70. Does Policy SP10 provide a clear indication of how a decision maker should react to a development proposal for retail uses on the allocated sites? Does Policy SP10 or its reasoned justification need to be modified to reflect the changes to the UCO which came into effect on 1 September 2020?

71. Do the Plan's policies for retail and town centre development offer sufficient flexibility to respond to future changes to the retail and service sector in Ipswich which may result from the economic effects of the COVID-19 pandemic? Are any modifications required to address this?
72. As the Plan will supersede the previous Site Allocations Plan on adoption, should references such as 'New site...' and the 'Central Shopping Area is amended ...' be removed?
73. Are Policies DM27 for Central Shopping Area and DM30 for District and Local Centres positively prepared, justified, effective and consistent with national policy? In particular:
 - a. Are they sufficiently flexible in allowing for residential uses in town and district centres, including where there is a reduced need for retail floorspace and other commercial town centre uses?
 - b. Should Use Classes C1 and D2 be included as uses which would be acceptable in the Primary Shopping Zones?
 - c. Do they need to be modified to reflect the changes to the UCO which came into effect on 1 September 2020?
74. Is Policy DM32 justified and consistent with national policy in respect of the 'scale' of retail proposals outside defined centres? In order to be effective and consistent with national policy, should the policy refer to the sequential approach? What is the justification for thresholds of 200sqm for application of the sequential test and 200sqm and 525sqm for retail impact assessment?
75. Is Policy DM28 consistent with national policy in guarding against the unnecessary loss of valued cultural facilities and services? Are the proposed modifications to Appendix 6 in respect of marketing requirements necessary, to ensure the policy is effective in this respect, and, as a result, would it be more or less evident how the decision maker should react to a proposal for the loss of such a facility?

Matter 6: Site Allocations

Issue: Whether the proposed site allocations in the SAP are justified taking into account the reasonable alternatives, positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?

Questions

General

76. On what basis is Policy SP1, which seeks to safeguard sites for the uses for which they have been allocated, justified and effective?
77. Has the viability of allocated sites been adequately tested and assessed in order to ensure that infrastructure requirements and affordable housing provision can be made at the levels needed to serve the development proposed?

Strategic Allocations

Ipswich Garden Suburb (IGS) (Policy CS10)

78. What evidence is there to support the deliverability and developability of the IGS during the Plan period?
79. What evidence is there to show that the infrastructure requirements listed in Table 8B for the IGS are justified, deliverable and consistent with national policy?
80. The Ipswich and East Suffolk Clinical Commissioning Groups (CCGs) state that the opportunities for establishing a new health centre in the IGS are severely reduced and primary care would be provided for new patients at the Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site. Given that the SoCG [I4] says that it is not reasonable to rely on the latter as part of the infrastructure strategy at the IGS, what measures are in place to ensure that the requirement for healthcare provision set out in Policy CS10 and Table 8B would be provided?
81. As the proposed development of the IGS is required to contribute towards the Recreational Avoidance and Mitigation Strategy (RAMS), in addition to the provision of the Country Park and other on-site open space, how would this be secured and should reference to it be included in Policy CS10 and Table 8B?
82. Does Policy CS10 defer important policy matters relating to the development of the IGS, including infrastructure requirements, the location of the district and local centres and the phasing of the development to the SPD? Having regard to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 should these matters be included in the Local Plan?
83. What evidence is there to demonstrate that the development of the IGS would be viable and that the target of 31% affordable housing would be deliverable, given that planning permissions for the first two phases provide for 5% and 4% affordable housing only?

84. What evidence is there to support the Council's assumptions in respect of the anticipated delivery rate for the IGS? Is this realistic?
85. Is the phasing of the IGS justified and effective?
86. Should the Secondary School Site be shown as a broad location rather than a specific allocation on the Policies Map?
87. Has the potential impact of Sizewell C been considered in respect of rail freight transport passing through the site on the Ipswich to Westerfield line?
88. Has sufficient provision been made within the IGS for community outdoor sport provision, in particular playing fields?
89. Has sufficient consideration been given to the impact of the IGS on air quality, flood risk, drainage, the existing road network, sewerage infrastructure and biodiversity?
90. Should the allocation of land at IGS in the CSP also be included within Policy SP2 of the SAP?

Humber Doucy Lane (Policy ISPA4.1)

91. Is the allocation of this site on green field land on the edge of the settlement justified? Did the SA consider reasonable alternatives to this allocation, such as more homes in the town centre or on other sites within the urban area?
92. What evidence is there to demonstrate that the site will be delivered in full within the Plan period, given that it relies on the delivery of infrastructure within the Ipswich Garden Suburb site? What is the justification for this phasing? Should the Plan include a trigger point following which development on this site should begin to ensure its delivery within the Plan period?
93. How will the Council work with neighbouring authorities to ensure that this site is delivered?
94. Have the impacts upon local infrastructure and services been effectively considered? In particular:
 - a) Is it reasonable that the development should rely on the adjacent allocation at Ipswich Garden Suburb for the provision of its primary school places?
 - b) Should the policy include provision for healthcare facilities?
 - c) Should the allocation include a local centre/retail provision, as proposed in the SoCG [A28] with Suffolk County Council?
95. The supporting text at paragraph 8.28 states that the transport mitigation measures required for this development are challenging. The Council now proposes to remove the word 'challenging' from the supporting text. However, what evidence is there to support the deliverability of these transport mitigation measures?
96. Would the development of this site be viable, given the required contributions to affordable housing (30%) and infrastructure costs? Has this also taken account of the potential need for contributions to healthcare provision?
97. Would the development of this site maintain the separation between Ipswich and surrounding settlements? Should this be a requirement of Policy ISPA4, as suggested by the proposed change agreed in the SoCG [A25] with East Suffolk Council, to ensure consistency with Policy DM11?

98. Has the impact of the proposed allocation on the setting and significance of surrounding heritage assets been fully considered? Do the proposed modifications to the Site Sheet for ISPA4.1 [Appendix 18 to I12] adequately reflect the findings and recommendations of the Heritage Impact Assessment [IP30.3] for the site. Are any specific mitigation measures required within Policy ISPA4 to ensure it would be consistent with national policy in conserving the historic environment and the statutory duty to preserve the setting of listed buildings?
99. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet agreed with Suffolk County Council in the SoCG [A28] necessary to make the Plan sound in this respect?
100. Should the proposed allocation be enlarged to allow for the future expansion of Ipswich Rugby Football Club or would the provisions of Policy DM5 and criterion b of Policy ISPA4 ensure the needs of the Rugby Club for replacement or additional facilities are met?
101. Is it effective and justified to limit green infrastructure for the site to land within the allocated site?
102. Would the development of this site provide any net biodiversity gains or green infrastructure as required by Policies DM8, DM10 and DM11?
103. Has full consideration been given to the impact of the development of this site on the agricultural land, ecology, air quality, the existing road network, traffic, local services and facilities, flood risk and drainage infrastructure?
104. Is the wording of Policy ISPA4 clear and unambiguous, so it is evident how the decision maker should react to proposals assessed against it?
105. What is the status of the information contained in the site sheets at Appendix 3 to the SAP? Are all of the key development constraints for the site ISPA 4.1 contained within the relevant policy?
106. Should the allocation of land at Humber Doucy Lane in the CSP also be included within Policy SP2 of the SAP?

Housing Allocations (Policies SP2 and SP3)

Land allocated for Housing (Policy SP2)

107. Are the proposed housing allocations consistent with the spatial strategy for the Borough as set out in Policy CS2?
108. Was the process for the selection of the site allocations robust? Was an appropriate range and selection of sites assessed and were reasonable alternatives considered? Were appropriate criteria taken into account in deciding which sites to select? Was the assessment against those criteria robust?
109. Are the proposed housing allocations identified in Policy SP2 and Appendix 3 of the SAP, justified as the most appropriate sites when considered against the reasonable alternatives and would they be consistent with national policy, with particular regard to the following:
 - a) The relationship of the site to the existing settlement and its accessibility to local services and facilities?

- b) The evidence to support the site's 'deliverability' as defined in Annex 2 of the NPPF?
- c) Their viability having regard to the provision of any infrastructure, affordable housing and other policy requirements?

NB This question should be answered for each housing allocation listed in Table 1.

- 110. Is the policy approach proposed in the Plan which includes Policy SP2, along with Table 1 and Site Sheets in Appendix 3, justified and effective? Is the meaning of Policy SP2 clear and unambiguous about what type of development it applies to and what is required to comply with the policy? In short, is it clear how a decision maker should react to a development proposal on land allocated for housing in Policy SP2? Would the proposed changes set out in the Council's response to our Initial Questions in this regard provide sufficient clarity and ensure that the Policy is effective?
- 111. Are the housing allocations listed in Table 1 and referred to in Policy SP2 justified and effective? What evidence is there to demonstrate that they are deliverable and/or developable in accordance with the housing trajectory and the proposed site capacity? In particular, are they:
 - confirmed by the landowner involved as being available for the use proposed?
 - supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?
 - deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

NB This question should be answered for each housing allocation listed in Table 1.

- 112. Does Policy SP2 provide a clear indication of how a decision maker should react to a development proposal on one of the allocated sites, given the use of the phrase 'take into account appropriately'?
- 113. Should the development requirements/constraints for each allocated site, set out in the Site Sheets in Appendix 3, including affordable housing provision, be set out clearly in the policy?
- 114. Should any requirements for infrastructure, services and facilities to serve the proposed site allocations be included in Policy SP2 or in a separate policy?
- 115. Should paragraph 4.7 refer to the 496 dwellings allocated at Humber Doucy Lane in the CS as well as the 3,500 dwellings at IGS?
- 116. Where allocations are for mixed uses, is it effective and justified for the requirements for these sites to be included in several policies, including SP2, SP5, SP6, SP7 and SP9, or should these be set out in a single policy for each mixed use site to provide a clear indication of how a decision maker should react to a development proposal on these sites?
- 117. Should Policies SP2 and SP3 refer to the allocated sites being identified on the Policies Map?

Site Specific Issues

IP009 – Victoria Nurseries, Westerfield Road

118. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

IP010a – Co-op Depot, Felixstowe Road

119. Is sufficient land set aside within the allocation for the provision of an extension to Rose Hill Primary School?
120. Although the Council says that the amount of land required for each use will be subject to separate landowner discussions and may be subject to change, as noted in the SoCG [A28] with Suffolk County Council, do Policies SP2 and SP7 provide a clear indication of how a decision maker should react to a development proposal on this site?

IP010b – Felixstowe Road

121. Would the noise from the existing employment uses in the centre of this site impact upon future occupiers of the residential elements of this allocation? Would this impact upon its deliverability?

IP011c – Smart Street/Foundation Street (North)

122. Has the impact of the proposed allocation on archaeology been fully considered?
123. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

IP012 – Peter’s Ice Cream, Grimwade Street

124. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

IP032 – King George V Field, Old Norwich Road

125. Would the development of this site be viable?
126. Is sufficient detail given about the amenity green space required as part of the site’s development?
127. Is Policy SP6 sufficiently clear about the requirements for replacement pitch and ancillary facilities?

IP035 – Key Street/Star Lane/Burtons (St Peter’s Port)

128. Would the development of this site be viable with the capacity proposed?
129. Should the Site Sheet refer to the need for car parking to be incorporated into this development to support it and developments on IP206 and IP211?
130. Would a more cautious approach to the delivery of this site be necessary given its constraints in relation to its siting between two busy roads?

IP037 – Island Site

131. Would an additional access be required to enable development? If so, what is the justification for this?
132. Is the requirement for 15% amenity green space for this site, set out in Policy SP6, justified?

133. Would a more cautious approach to the delivery of this site be necessary given the requirement for an additional access and that it has been allocated since 1997?

134. Should reference to early years provision be included in Table 1 in Policy SP2 for this site?

IP048a – Mint Quarter/Cox Lane East Regeneration Area

135. Is the mix of residential and primary school uses appropriate on this site?

136. Has sufficient consideration been given to the impact of the development on the heritage assets?

137. Should reference to early years provision be included in Table 1 in Policy SP2 for this site, as agreed in the SoCG [A28] with Suffolk County Council?

IP054b – Land between Old Cattle Market and Star Lane

138. Does the extent of this site allocation enable it to contribute to the wider regeneration aims of Opportunity Area B?

139. What is the justification for the allocation of this site for residential uses only as opposed to mixed uses given its location in the town centre?

140. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

IP061 – Former School Site, Lavenham Road

141. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, green space, heritage assets, the living conditions of neighbouring residents, highway safety and car parking, local services and facilities and local wildlife?

IP089 – Waterworks Street

142. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?

IP098 – Transco south of Patteson Road

143. Has full consideration been given to the impact of the development of this site on the living conditions of neighbouring residents and car parking?

IP132 – Former St Peter's Warehouse, 4 Bridge Street

144. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

IP136 – Silo, College Street

145. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

IP150d – Land South of Ravenswood – Sports Park

146. Should the development of this site be co-ordinated with the housing development at IP150e and the employment development at IP150c?

147. Has full consideration been given to the impact of the development of this site on the local highway network, sewage and drainage capacity, the AONB, ecology, local services and facilities and local wildlife?
148. Would the unusually shaped nature of this site impact upon the deliverability or capacity of the allocation?
149. Would the proposed allocation provide an appropriate mix of housing?
150. Would a more cautious approach to the delivery of this site be necessary?

IP150e – Land South of Ravenswood

151. Should the development of this site be co-ordinated with the housing development at IP150d and the employment development at IP150c?
152. Would the proposed allocation provide an appropriate mix of housing?
153. Has full consideration been given to the impact of the development of this site on the local highway network, sewage and drainage capacity, the AONB, ecology, local services and facilities, climate change and local wildlife?
154. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

IP307 – Princess of Wales Drive

155. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, green space, the living conditions of neighbouring residents, biodiversity, highway safety and car parking, local services and facilities and local wildlife?

IP354 – 72 (Old Boatyard) Cullingham Road

156. Has full consideration been given to the impact of the development of this site on the living conditions of neighbouring residents, highway safety, traffic congestion and car parking, pollution, flood risk, play provision, drainage and sewage capacity, local services and facilities and local wildlife?
157. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?

IP355 – 77-79 Cullingham Road

158. Has full consideration been given to the viability of the development of this allocation when assessing the site's capacity, including the 10m buffer zone along the river?
159. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?

Housing Sites with PP or awaiting a S106 Agreement (Policy SP3)

160. Is the policy approach proposed in the Plan which includes Policy SP3, along with Table 2, justified and effective? Is the meaning of Policy SP3 clear and unambiguous about what type of development it applies to and what is

required to comply with the policy, should the permission fail to be issued or implemented and lapse during the Plan period or the development fails to come forward or be completed in accordance with the permission? In short, is it clear how a decision maker should react to a development proposal on land with planning permission or awaiting a S106 Agreement in Policy SP3? Would the proposed changes set out in the Council's response to our Initial Questions in this regard provide sufficient clarity and ensure that the Policy is effective?

161. Are the housing sites with planning permission or awaiting a Section 106 Agreement listed in Table 2 and referred to in Policy SP3 justified and effective? What evidence is there to demonstrate that they are deliverable and/or developable in accordance with the housing trajectory and the proposed site capacity? In particular, where a site:
- benefits from planning permission which has not yet been implemented, what evidence is there to support its start date, build out rate and completion?
 - has started and then stalled, what evidence is there to support its recommencement, build out rate and completion?
 - is awaiting the completion of a Section 106 Agreement, what evidence is there to support the timescale for completion of the legal agreement, the discharge of any planning conditions and its start date, build out rate and completion?

NB This question should be answered for each site listed in Table 2, as appropriate.

162. Is it reasonable to include these sites in the calculation of housing supply?

IP150a – Ravenswood U, V, W

163. Has full consideration been given to the impact of the development of this site on the local highway network, including the cumulative impact of other nearby development proposals, and local services and facilities?

164. Would the proposed allocation provide an appropriate mix of housing?

IP206 – Cranfields, College Street

165. Is the capacity figure conservative? Could more dwellings be accommodated on this site?

IP211 – Regatta Quay

166. Is the capacity figure conservative? Could more dwellings be accommodated on this site?

IP279a – Former British Telecom, Bibb Way

167. Has full consideration been given to the impact of the development of this site on local wildlife?

Land allocated for Employment uses (Policy SP5)

168. What evidence is there to support the deliverability of the land allocated for employment use in Policy SP5?

169. Would any changes be required to the policy to address the changes to the Use Classes Order, introduced in September 2020?
170. Is the policy approach proposed in the Plan which includes Policy SP5, along with Table 3 and Site Sheets in Appendix 3, justified and effective? Is the meaning of Policy SP5 clear and unambiguous about what type of development it applies to and what is required to comply with the policy? In short, is it clear how a decision maker should react to a development proposal on land allocated for employment in Policy SP5? Would the proposed changes set out in the Council's response to our Initial Questions in this regard provide sufficient clarity and ensure that the Policy is effective?
171. Are the employment allocations listed in Table 3 and referred to in Policy SP5 justified and effective?
172. Has sufficient land been allocated to meet the identified employment needs?
IP141a – Land at Futura Park, Nacton Road (formerly the Cranes Site)
173. Has full consideration been given to the impact of the development of this site on the AONB?
174. Is the site deliverable given the issues encountered in marketing the site for the B Class uses proposed?
IP150c – Land South of Ravenswood
175. What is the justification for the allocation of this site for employment uses?
176. Should the development of this site be co-ordinated with the housing developments at IP150d and the employment development at IP150e?
177. Have the cumulative impacts on traffic, air quality, noise, heritage and ecology of the development of this site, along with the housing allocations at IP150d and IP150e, and the employment allocation at IP152 (Airport Farm Kennels) been fully considered?
178. How would the access to the site be provided? Would any access also serve the housing allocation at IP150e and the wider Ravenswood?
IP152 – Airport Farm Kennels, north of the A14
179. What is the justification for the allocation of this site for employment uses?
180. Has full consideration been given to the impact of the development of this site on the local road network?
181. Is the reference to the Council investigating the feasibility of park and ride on part of this site in Table 3 and in Policy SP9 justified and effective, given the objections from the landowner? Is it the intention of the Council to 'safeguard' part of the allocation as a site for park and ride? If so, should this be made explicit in Policies SP5 and SP9 of the Plan? If not, do Policies SP5 and SP9 provide a clear indication of how a decision maker should react to a development proposal on this site, in particular whether provision for park and ride will be a requirement?

Allocations for Open Space and Leisure Uses or Community Facilities (Policies SP6 and SP7)

182. Does Policy SP6 provide a clear indication of how a decision maker should react to a development proposal for public open space on Site IP083?
183. What evidence is there to support the deliverability of leisure uses and community facilities allocated in Policy SP7?
IP037 – Island Site
184. On what basis has 15% Open Space been allocated on the Island Site?
IP150b – Land South of Ravenswood
185. Is the allocation of this site for a Sports Park justified?
186. Has full consideration been given to the impact of the development of a Sports Park on this site on the AONB?
187. Has full consideration been given to how access could be made to this proposed Sports Park?
188. Has full consideration been given to the impact of the development of a Sports Park on ecology, as well as traffic congestion in the locality?
189. Should further details be provided in respect of the types of facilities to be provided?

Orwell Country Park Extension (Policy SP8)

190. Does Policy SP8 provide a clear indication of how a decision maker should react to a development proposal for the Orwell Country Park extension on this site? Should it contain any criteria against which to assess any proposal?

Land safeguarded for transport infrastructure (Policy SP9)

191. Policy SP9 refers to the Council investigating the feasibility of park and ride on part of IP152 – Airport Farm Kennels. What evidence is there to support the need for and deliverability of additional park and ride at this site?
192. Is it clear from Policy SP9 and Table 6 how much land is reserved for specific transport infrastructure?
193. Does Policy SP9 provide a clear indication of how a decision maker should react to a development proposal for transport infrastructure on the allocated sites?
194. Are the transport infrastructure requirements at IP037 - Island Site set out in Table 6 to Policy SP9 justified and effective?

Matter 7 – IP-One Area Action Plan

Issue: Whether the AAP for the IP-One Area is sound, in terms of whether the policies and proposals are positively prepared, justified, effective and consistent with national policy?

Questions

Strategy for IP-One Area

195. Is Policy CS3 of the CSP clear that the AAP has been prepared and is contained within the Site Allocations and Policies DPD, as proposed by the Council in its SoCG with Historic England [I30.1]?
196. Is it clear which policies and site allocations in the ILPR comprise the IP-One Area Action Plan?
197. Is the overall spatial strategy for the IP-One Area clearly written and unambiguous and is it justified as an appropriate strategy for the central area of Ipswich, taking into account the reasonable alternatives?
198. Are the Policies SP10 to SP13 clear and unambiguous and is it evident how a decision maker should react to development proposals on land within the areas they relate to? Are they consistent with national policy?
199. Would the improvements to pedestrian and cycle routes identified in Policy SP15 provide safe and accessible routes which would promote walking and cycling? Are the improvements deliverable? Have the implications of the provision of these improvements been considered on the viability of the associated schemes?
200. Does Policy SP15 provide a clear indication of how a decision maker should react to a development proposal where improvements to pedestrian and cycle routes are supported by this policy? Are the specific improvements set out in the policy all shown on the Policies Map as safeguarded routes?
201. Has the Council considered the impact of the regeneration of the IP-One Area on existing uses, including the Port of Ipswich, as well as the heritage assets in this area? What evidence is available to support this?
202. Are the transport proposals in the IP-One Area set out in Policy SP16 effective and justified?
203. Does Policy SP16 provide a clear indication of how a decision maker should react to a development proposal where the provision of a new Wet Dock Crossing is proposed and/or improvements to pedestrian and cycle routes are supported by this policy?
204. Should the potential route for a Wet Dock Crossing be shown on the IP-One Area Inset and should reference be made in Policy SP16 to the potential route for a Wet Dock Crossing being shown on the Policies Map?
205. Is the town centre car parking policy set out in Policy SP17 justified, effective and consistent with national policy?

IP-One Opportunity Areas

206. Is the delineation of these areas on the Policies Map/Key Diagram effective and justified? Is it clear whether the Development Options, Opportunities and Principles in the Opportunity Areas are policies, site allocations or

guidance? Are they effective and consistent with national policy? Would the proposed changes put forward by the Council in its SoCG with Historic England [I30.1] be sufficient to make the Plan sound in this respect?

207. Is it clear which policies within the ILPR apply to these areas?
208. Should the development opportunities and development principles for each Opportunity Area be set out in a Policy in the Plan?
209. Would the development opportunities for each area enable development to come forward?
210. Is the extent of the Opportunity Areas justified and effective?
211. Has full consideration been given to the impact of the redevelopment of these Opportunity Areas on heritage assets and existing uses? Are the development principles consistent with national policy in this respect?
212. What evidence is there to show that these sites will come forward for housing in the Plan period?
213. Are these sites deliverable and/or developable in the Plan period?
214. Have these sites been included in the calculation of housing supply?
215. Has full consideration been given to the impact of development within the Opportunity Areas on the living conditions of existing residents?

IP028b – Jewsons, Greyfriars Road

216. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet agreed with Suffolk County Council in the SoCG [A28] necessary to make the Plan sound in this respect?

IP226 – Helena Road/Patteson Road

217. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, the living conditions of neighbouring residents and car parking?

The Waterfront (Policy SP11)

218. Is the extent of The Waterfront appropriately defined? Should it be extended westwards to include land north of Burrell Road?
219. Are the Opportunity Areas clearly defined and labelled on the Policies Map?
220. Does the policy provide a clear indication of how a decision maker should react to a development proposal within The Waterfront?
221. Should references to the 'Final Draft...' and '(formerly SP14)' be removed from the Policy?

Education Quarter (Policy SP12)

222. Does the policy provide a clear indication of how a decision maker should react to a development proposal within the Education Quarter? Is it appropriate to consider Waterfront uses 'on their merits'? Should the policy include criteria against which to assess the merits?

Portman Quarter (Policy SP13)

223. Does the policy provide a clear indication of how a decision maker should react to a development proposal within the Portman Quarter? Should it contain any criteria against which to assess any proposal or is it sufficient to defer to Policy DM31?
224. Should references to the 'Final Draft' be removed from the Policy?

Matter 8 – Development Management Policies

Issue: Whether the development management policies are justified, positively prepared, effective and consistent with national policy?

Questions

Sustainable Construction and Low Carbon Energy

225. Is Policy DM1 effective and consistent with national policy with regard to sustainable construction?
226. Is the target, for all new build development of 10 or more dwellings or in excess of 1,000sqm of other residential or non-residential floorspaces, of at least 15% of energy requirements from decentralised and renewable or low carbon sources in Policy DM2 justified and effective?

Transport and Access

227. Is Policy DM21 effective, justified and consistent with national policy in respect of transport and access in new developments?

Car and Cycle Parking

228. Does Policy DM22 defer important policy matters relating to vehicle parking, including cycle parking, in new developments, to other policy documents, including the Suffolk Guidance for Parking (2019). Having regard to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 should these matters be included in the Plan?
229. Is the town centre car parking strategy in Policy SP17 justified and effective? Has consideration been given to its impact on climate change and air quality?
230. Does Policy SP17 provide a clear indication of how a decision maker should react to a development proposal for car parking on the allocated sites?

Air Quality

231. Is Policy DM3 consistent with national policy in respect of the impact of new development on air quality?

Heritage Assets

232. Is Policy DM13 consistent with national policy and effective in respect of its approach to heritage assets?
233. Is Policy DM13 justified and effective, particularly in respect of the reference to the removal of permitted development rights and the inclusion of reference to the use of SPD to inform planning decisions?
234. Is the Plan effective and consistent with national policy in respect of the impact of the policies and proposals on heritage assets?

Open Space, Sport and Recreation

235. Should Policy CS16 apply to all developments, including those involving high density residential schemes within the IP-One Area?
236. Is the provision of private outdoor amenity space in all new residential developments in Policy DM7 justified, effective and consistent with national policy?

237. Would the % of open space proposed on proposed mixed use sites in Policy SP6 accord with Policy DM6 in the CS?
238. Is the requirement in Policy DM6 for the provision of open spaces, sport and recreation facilities in residential developments of 10 or more dwellings justified and effective?

Green Infrastructure and the Natural Environment

239. Is Policy DM8 on the Natural Environment consistent with national policy, particularly in respect of securing biodiversity net gains?
240. Is the proposed change to Policy DM8 set out in the SoCG with East Suffolk Council [A25] to include a reference to the RAMS justified?
241. Does Plan 5: Ipswich Ecological Network, represent the most up to date wildlife audit?
242. Are the Green Corridors identified in Policy DM10 justified and effective?
243. Is the change proposed by the Council to the supporting text to Policy DM11, to reflect the appropriate consideration of the setting of the AONB, justified and consistent with national policy?

Design and Character

244. Are the requirements of Policy DM12 for 25% of new dwellings to be built to Building Regulations Standard M4(2) justified?
245. Would the changes proposed to the supporting text to Policy DM12 be effective in encouraging the installation of green roofs and walls?
246. Is Policy DM15 justified and effective in respect of the siting and design of tall buildings? Is the proposed change to Criterion i. set out in the SoCG with Historic England [I30.1] sufficient to ensure that the settings of conservation areas and scheduled monuments are safeguarded?
247. Should Policy DM18 refer to technical guidance on overlooking in order to be effective?

Infill and Backland Residential Developments

248. Should Policy DM17 include reference to the unacceptable loss of semi-natural habitat?
249. Does Policy DM17 unduly constrain the ability of the Borough to secure sufficient windfall housing to ensure the delivery of the projected housing land supply?

Protection and Provision of Community Facilities

250. Is Policy DM24 effective in terms of protecting community facilities given that several criteria need to be 'demonstrated to the Council's satisfaction'?

Matter 9 – Implementation and Monitoring

251. Is the strategy for implementation, monitoring and review appropriate and robust?

Policies Map

252. Is the Key for the Local Plan Review Policies Map up to date in respect of geological sites?