Part 2

Ipswich Borough Issues and Options



Introduction

Part 1 of the Local Plan Issues and Options document addresses strategic cross-boundary matters within the Ipswich Housing Market Area and Ipswich Functional Economic Area (these are wider than the administrative boundary of Ipswich Borough).

The strategic, cross-boundary issues are:

- The number of homes and jobs that should be planned for;
- Where in broad terms (not looking at specific sites) these should be located;
- What scale of future shopping provision should be planned for; and
- The need for infrastructure such as roads, schools and green spaces.



If you would like to comment on these issues, please look at Part 1 of this consultation document which, has been published jointly with Suffolk Coastal District Council.

Part 2 of the Local Plan Issues and Options documents addresses local matters specific to Ipswich Borough. These issues are:

- Specific policies to guide development ('development management' policies);
- Specific sites that could accommodate future development;
- The approach to planning central Ipswich;
- The mix and density of housing, and affordable housing;
- Where to locate employment opportunities;
- Local transport and infrastructure within the town;
- How to plan for Ipswich town centre and the district and local centres;
- Tourism;
- Tackling and adapting to climate change;
- Design;
- Protecting the historic and natural environment;
- Open space and biodiversity;
- Sport and leisure; and
- Demography, social inclusion and health

Topics are considered in turn below and are interspersed with questions. Comments are invited on any or all of the questions. There is an opportunity to comment on any topic areas that have not been covered here at the end of this document.

'Issues and Options' is the first stage in the Local Plan review. The purpose of this stage is to:

- 1. Define the *issues* by gathering views on local land use issues which the plan needs to address and gain a picture of what communities in Ipswich want for and from the town.
- 2. Identify *options* available to address the issues identified and to gauge the reaction of residents and interested parties to the different options suggested.

The land use plan can only influence some aspects of the local environment. Other aspects such as highways and waste planning are the responsibility of Suffolk County Council. National land use policy in the National Planning Policy Framework determines the high level approaches to planning at the local level.

Development management policies

Development management policies within the Local Plan guide development proposals in the Borough and are used in the determination of planning applications. The National Planning Policy Framework (NPPF) (March 2012) sets out national policy on specific matters and a Local Plan should not just repeat these. Policies should therefore be distinctive to Ipswich and be used to plan positively for development in the Borough.

The development management policies in the adopted Local Plan (February 2017) are grouped into topic areas as follows:

- Sustainable Development;
- Flooding and Sustainable Drainage;
- Urban Design Policies;
- Protecting Our (Heritage) Assets;
- Small Scale Residential Development;
- Small Scale Infill and Backland Residential Developments;
- The Subdivision of Family Dwellings;
- Transport and Access;
- Parking;
- Proposals in Retail Areas;
- Employment Land;
- Amenity;
- Open Space, Sport and Recreation;
- The Density of Residential Development;
- Natural Environment;
- Community Facilities; and
- Countryside and Access.

Looking at the policies in the 2017 Local Plan, there are areas such as proposals in retail areas that are to be amended as a result of more up-to-date evidence i.e. the new Retail and Leisure Study.

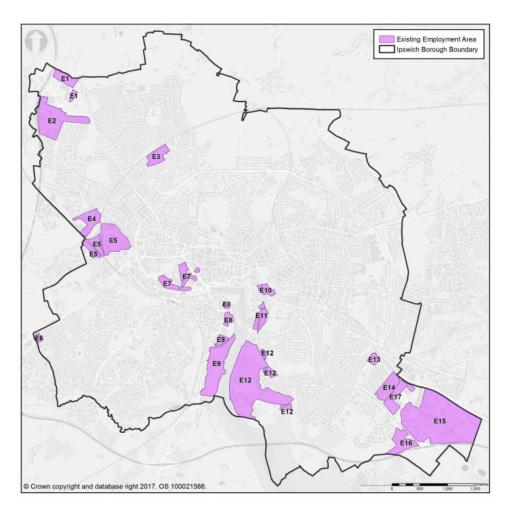
- Q34 Do you consider any of the development management policies need to be amended? If so, which ones, why and how?
- Q35 Are there new development issues which may warrant the inclusion of new development management policies in the plan? If so, what are they, and what would the policies need to do?

Potential land for development including new land for housing

At the Public Examination into the Ipswich Local Plan in 2016, the Planning Inspector requested that the Council undertake a review of land in the Borough to identify further potential sites for housing development, over and above those identified in the adopted Ipswich Local Plan (February 2017).

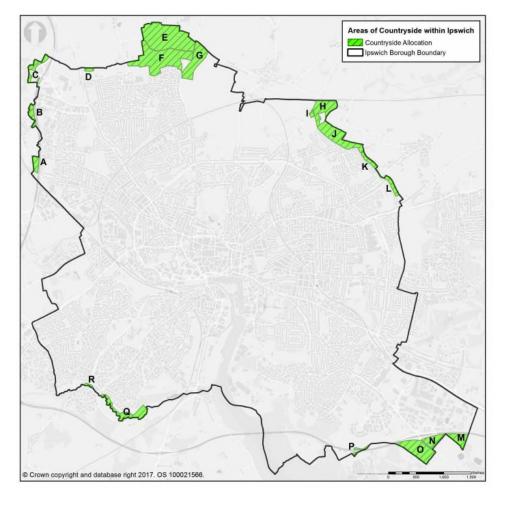
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Are there suitable sites which are currently located in employment areas, which we could re-allocate to housing without compromising the remainder of the employment area? (See map to the right for details of current employment areas).



Potential land for development including new land for housing (continued)

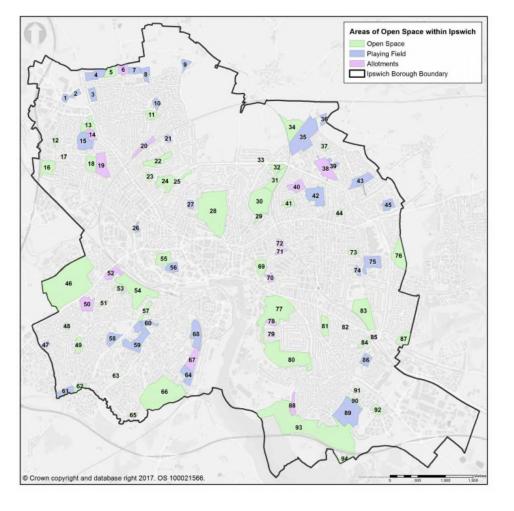
Land is allocated in the Borough as countryside. Should we re-allocate countryside sites to housing? If not, why not? If yes, which areas? (See map to the right for details of current countryside areas).



Potential land for development including new land for housing (continued)

Land is identified as open space. Should we re-allocate some open space sites to housing? If not, why not? If yes, which ones? (The map to the right shows all the areas of open space in the Borough).

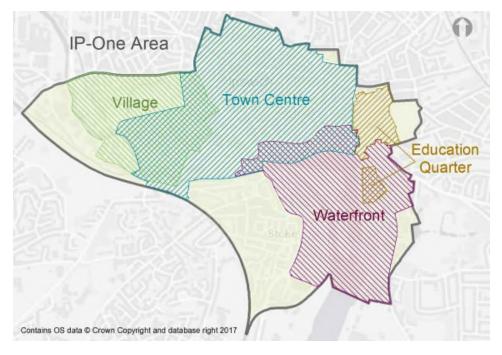
Are there other sites in the Borough that you consider would be suitable and available for housing or other development? Please provide details. Please note, sites submitted through the call for sites exercise do not need to be re-submitted.



Central Ipswich: IP-One and Ipswich Vision

The IP-One area has been a useful focus for policy and regeneration efforts in central Ipswich. It combines four areas which overlap at the edges, each of which has a customised policy approach:

- the town centre and central shopping area the focus for retail, leisure and office development with residential uses encouraged on upper floors;
- **b.** the Waterfront, a mixed use area of living accommodation, pubs, cafes and restaurants, the hub of the University of Suffolk, office accommodation and boat-related activities;
- c. this overlaps with the Education Quarter which contains the University of Suffolk and the Suffolk New College, and it is about ensuring these institutions have sufficient space available to meet current and future needs for teaching space, student accommodation and associated activities; and
- d. Ipswich Village, which is another mixed use area of offices, leisure (including Ipswich Town Football Club's ground at Portman Road), open space and living accommodation, close to the station and the town centre. The delivery of sites allocated through the local plan will increase the number of people living in this area.



Some policy approaches are nationally prescribed, for example the principle that retail, leisure and office developments are 'main town centre uses' which should be located centrally and controlled elsewhere.

More recently the Ipswich Vision has identified ten smaller quarters across central Ipswich as shown and described below. Whilst they look different from the Local Plan areas, the mix of uses described aligns closely with the four Local Plan policy areas.



Central Ipswich: IP-One and Ipswich Vision (continued)

Extract from Ipswich Vision Document showing the ten 'quarters' and the expected mix of uses in each quarter.

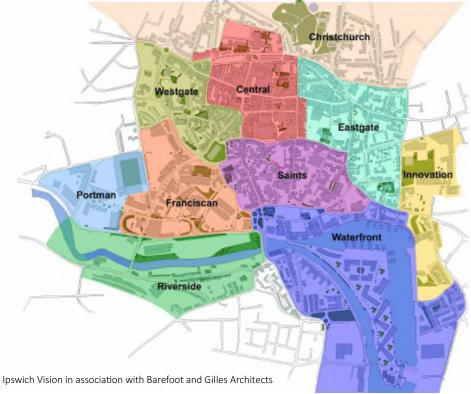
The Westgate Quarter - a mixed area including residential, car parking and leisure surrounding the New Wolsey Theatre.

The Central Quarter - a distinctive retail and leisure offer, with some associated employment uses, all within a predominantly pedestrianised environment.

The Portman Quarter - an area of commerce, public authorities and complementary employment and sporting uses.

The Franciscan Quarter - an employment area surrounding the new Princes Street office corridor and Cardinal Park, a leisure and entertainment park.

The Riverside Quarter - an area to the west of the waterfront incorporating new waterside residential developments, car parking and river walkways leading to and from the station.



Q40

For planning purposes, should we continue with the IP-One approach or align with the Ipswich Vision 'quarters' definitions? In either scenario, are the boundaries and the policy approaches appropriate?

The Christchurch Quarter - an area of high value housing clustered around Christchurch Park, the Mansion and the Museum.

The Eastgate Quarter - a mixed area with expanded areas of urban living supplemented by retail, leisure and entertainment uses alongside car parking.

The Saints Quarter - a mixed area structured around north-south routes bringing together new residential developments with supporting and experimental independent retail and leisure uses.

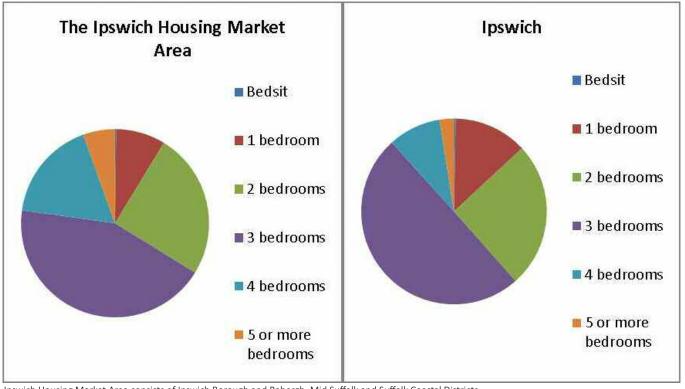
The Innovation Quarter - an exciting learning and creative area surrounding University Campus Suffolk and Suffolk New College.

The Waterfront Quarter - the amphitheatre surrounding the marina and incorporating an island site and within which business, enterprise and leisure uses are encouraged.

Housing mix, affordability and density

The existing stock of homes in Ipswich is dominated by three-bedroom dwellings which account for 49.9% of the stock, higher than the proportion in the Ipswich Housing Market Area (HMA) (43.4%) and England (41.2%). Two-bedroom dwellings make up another 25.4% of the Ipswich stock, similar to the HMA (25.1%) but lower than England (27.9%). The pie charts below compare the size (by number of bedrooms) of the existing stock in the Ipswich HMA and Ipswich Borough. This includes all kinds of homes – detached, semi-detached, terraced and flatted. The size range of the Ipswich housing stock reflects the age and nature of housing in the Borough: late 19th C and early 20th C terraced housing which generally has two to three bedrooms, and significant inter-war and post-war suburban development of semi-detached and detached homes which tend to have three bedrooms.





Ipswich Housing Market Area consists of Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts.

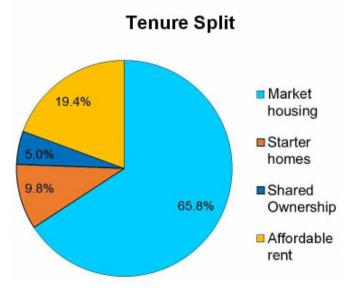
Housing mix, affordability and density (continued)

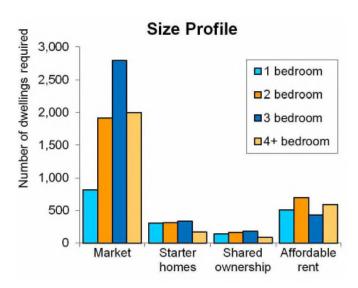
The Strategic Housing Market Assessment Part 2 report identifies the housing need in Ipswich Borough by tenure and size. This is reproduced in the figures below. It is set out as a guide to the overall mix of accommodation required in the Borough although it is acknowledged that the Council may wish to divert away from this profile in particular instances. It shows that for market housing, the need is predominantly for three-bedroom dwellings and also two-bedroom and four-bedroom plus dwellings. For discount home ownership and affordable rent, it is a more even spread. Although much recent development in Ipswich has been in the form of apartments, there remains some need for one-bedroom homes in all tenures.

Q41

Should the Local Plan continue to insist on a mix of dwelling sizes and types on each individual site or aim to ensure that we end up with a mix overall, across all development sites in the Borough?

Starter Homes are an emerging government initiative outlined in the Housing and Planning Act 2016. They are aimed at helping first-time buyers under the age of 40 onto the housing ladder through being sold at a discount of at least 20% of the market value. The adopted Local Plan





Note to figures: Market housing includes both owner-occupied and private rented Starter homes figures represent potential demand rather than a requirement

makes some provision for them, for example in employment areas where certain conditions are met. However, now that employment areas have been reviewed through the Employment Land Supply Assessment, it may be appropriate to revert to excluding housing from remaining employment areas under all circumstances.

Q42

Do you consider that 'starter homes' should be allowed as an exception on employment areas? Or should 'starter homes' simply be considered part of an overall mix of housing to be delivered on sites allocated for housing?

Housing mix, affordability and density (continued)

The current Local Plan sets out the approach to affordable housing provision. The threshold for provision is developments of 15 dwellings or more and the target for provision is at least 15% (N.B. Ipswich Garden Suburb requires 31%), as a result of viability assessment. Affordable housing completions in the Borough have fluctuated in recent years as overall completions levels have struggled to return to pre-recession levels and funding available to Housing Associations has changed. For the last five years, affordable housing completions in Ipswich have been as follows:

The higher percentages delivered over the last two years are due to specific schemes and circumstances, including the Council's own housing scheme at Bader Close and the Stoke Quay scheme which received gap funding from the Homes and Communities Agency. Early monitoring results for 2016/17 indicate that the affordable housing completions level will be significantly lower.

Should the threshold for affordable housing provision in private market developments or the targets for provision in different parts of the Borough be revised and on what evidence would you base this?

What do you consider to be an appropriate mix of affordable and private market housing in new developments if viability is not a concern?

Year	Number of affordable homes completed	Total dwelling completions	% of total completions affordable
2011/12	152	283	54%
2012/13	7	100	7%
2013/14	44	228	19%
2014/15	202	470	43%
2015/16	133	496	27%
Total 2011- 2016	538	1,577	34%







Housing mix, affordability and density (continued)

Q46

The Accommodation Needs Assessment for Gypsies, Travellers, Travelling Showpeople and Boat Dwellers indicates that Ipswich has 39 current, occupied, permanent pitches for Gypsies and Travellers. It identifies a future need for an additional 27 permanent pitches to be provided by 2036, as well as the ongoing work to jointly provide transit pitches across the whole of Suffolk. Gypsies and Travellers can also provide their own privately-owned sites. Currently the Local Plan contains a criteria based approach (Policy CS11) to guide the location of sites, which is intended to ensure that the sites are safe and accessible and reasonably close to community facilities including schools.



Q45 Where should additional permanent pitches for Gypsies and Travellers be allocated?

Should the current criteria-based policy for assessing applications for Gypsy and Traveller sites be changed?

There are currently over 4,500 full and part-time students studying at the University of Suffolk equating to a full-time equivalent of 3,200 students. Just over 15% of students require accommodation, with 573 resident in on-campus halls of residence, 137 living in off-campus halls of residence and 37 in the local private rented sector. Some 70% of the student population base are from the local area (from within the four closest post code areas (IP, CO, NR, PE) and the majority of these are thought to be living at their parents' home whilst studying. The private rented accommodation occupied by students is located within one mile of the waterfront campus and there are no notable problems with students in relation to housing currently. The University has plans to grow, but the additional impact on the local housing market arising from the University is likely to be small.

The current Local Plan aims to control the proliferation of many Houses in Multiple Occupation (HMOs) in a small area, insofar as it can be controlled through planning policy. HMOs can be occupied by any sector of the population.

Q47

Is this approach proving effective or are there residential areas where the number of people living in HMOs is considered excessive? Should the policy approach be continued and if so what proportion of shared dwellings should be permitted in any one street?

Homes can be built at a range of different densities, which is measured as dwellings per hectare. The Local Plan seeks to control the density of development in order to ensure that land is used efficiently. The strategic approach to density as a potential source of additional housing is addressed through the Part 1 Issues and Options. The local approach to density in Ipswich has been to require high density development in the town centre, Ipswich Village and Waterfront; medium density in the rest of IP-One and in and around district centres; and low density elsewhere (Policy DM30). As an indication, the density of the Ravenswood development is around 39 dwellings per hectare, which is on the cusp between low and medium density.

Q48

Should the Council continue this approach to the density of residential development?

Employment

The Local Plan Part 1 Strategic Issues and Options asks whether employment land should be considered as a source of land for additional housing provision in Ipswich, because of the tightly drawn boundary around the Borough. Ipswich has a challenging jobs forecast of 19,040 jobs to be delivered between 2014 and 2036 (from the East of England Forecasting Model 2016). The Employment Land Supply Assessment (ELSA) study has converted this into a calculation of land needed for employment uses. The starting point for net employment land need in the Borough is around 28 hectares (ha), which is approximately half of the land area that the current adopted Local Plan allocates for employment use.

However, this starting point figure does not take account of the need to provide a range of sites of different sizes in different locations and ensuring that there is enough land of the right quality. Some of the land and premises being vacated and factored into the net calculation may be unfit for purpose. The land estimate is also a 'business as usual' projection of recent economic trends rather than reflecting any growth ambitions.

Whilst it is unlikely that changing land from employment to housing use within the Borough would deliver sufficient land to accommodate the Objectively Assessed Needs for housing, there may be allocated employment sites which could be suitable for residential use (see question 36).



The Council's own monitoring of the Employment Areas such as Whitehouse and Ransomes Europark shows that occupancy rates have increased over the last year. The areas provide an important source of land and premises for local businesses and offer sites away from sensitive uses such as homes, whose occupants could be disturbed by 24 hour operation or by odour. The monitoring also reveals the extent of localised 'churn' in occupation which takes place from year to year as businesses seek to expand or contract. The Employment Areas fulfil a vital function in allowing this element of flexibility in the local market.

The current Local Plan allows for uses such as small gyms or cafes to provide local services for the workforce, and car showrooms within the Employment Areas. Is this the right approach?

Q50 Should all the sites allocated for employment use be protected from residential or other uses?

Q51 Should the Council allocate more employment land than is needed to ensure choice?

The current Local Plan allows a degree of flexibility over land uses in employment areas and existing employment sites outside the Employment Areas, provided a marketing exercise is undertaken to demonstrate that the site is not needed for business, industrial or storage and distribution uses.

What marketing should we require to prove redundancy of a site for business, industry or storage and distribution?

Q52



Infrastructure and Transport

National planning policy requires that we plan positively for the housing and jobs development needed in the area and also the infrastructure needed to support it. Infrastructure includes a wide range of facilities and services which support daily life. An effective transport system is key to ensuring places are successful.

Currently infrastructure is planned for and delivered in a number of ways. The Local Plan identifies infrastructure items for which land needs to be safeguarded, for example sites are identified for new schools and surgeries in the adopted Local Plan. Infrastructure is currently largely delivered in Ipswich through negotiated planning obligations at the time of a planning permission or via central Government funding. The Council does not have a Community Infrastructure Levy, which is a tariff charged per square metre of new development and is subject to exemptions.

Q53 Is a

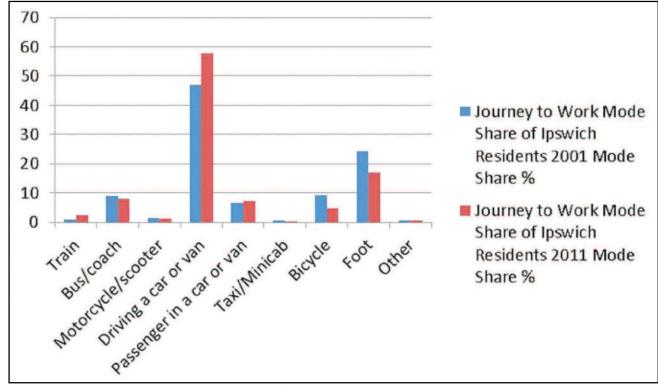
Is the current system of funding infrastructure effective? Should the Council consider introducing a tariff-based charge to fund infrastructure?

At a strategic level, the congestion problems experienced in Ipswich when the Orwell Bridge closes are well documented. There are currently two projects underway exploring alternative options for east-west routes: the Ipswich Northern Routes Study and the Upper Orwell Crossings Study. Strategic transport issues are explored through the Local Plan Part 1 Strategic Issues and Options document.

A number of factors have led to increased congestion in certain parts of the town, as the existing network struggles to handle the impact of an increased population within the town and the wider residential areas that surround it.

Q54 How best can we tackle congestion in Ipswich?

Ipswich is a compact town, which lends itself to walking and cycling. However, car ownership, whilst lower than the average in Suffolk, has increased from 1 car per household in 2001 to 1.06 cars per household in 2011 and travel to work information indicates that cars still dominate. It is thought that one reason behind the growth in car based commuting between 2001 and 2011 may have been that Ipswich residents were having to commute further to jobs outside the Borough.



Source: WSP, Ipswich Census Data Trend Analysis, 2014/15, percentages total 99.9% likely due to rounding (ICD48b)

Infrastructure and Transport (continued)



Q55 How can sustainable modes of transport be encouraged?

Congestion is a problem for everybody. It impacts on the economy, the environment and health. For some journeys the car may be the only realistic, safe and practical choice. For other journeys, there is potential for people to use public transport, or to walk and cycle, which could be supported through the way developments are planned.

In central Ipswich, the shopping centre focused around Tavern Street and the Corn Hill is separated from the Waterfront by the gyratory system of Star Lane and College Street / Key Street, which deters pedestrians and contributes to one of the Borough's larger Air Quality Management Areas. The gyratory, which is a busy dual carriageway, hampers delivery of the Ipswich Vision of a 'Waterfront Town Centre' and detracts from the setting of valued medieval buildings and structures, including the three waterfront churches and Wolsey's Gate.

The gyratory is also one of only three east-west routes available in the town because of the river and the historic core: the gyratory, St Matthew's Street / Crown Street / St Helen's Street, and Colchester Road.

The Council is not the Highway Authority and therefore cannot plan roads — this falls to Suffolk County Council. However, through successive local plans, and working with Suffolk County Council, Ipswich Borough Council has encouraged work to explore ways to enhance east-west transport capacity in order to enable improvements to pedestrian and cycle routes between the Waterfront and the historic core of the town.

What changes, if any, would you like to see to the gyratory?

Creating new road space is not the only solution. Public transport is effective at getting people from the periphery of the town to the centre but not in making more circular journeys (e.g. from Chantry to Ransomes Industrial Estate). Bus services in some parts of the town operate with frequencies which are lower than is desirable and may be absent in the evenings and on Sundays. This is particularly important when considering people's ability to use public transport to reach key peripheral destinations such as the hospital and Ransomes in the east or Whitehouse Employment Area in the west.

What new transport infrastructure or services do you think are needed to support further growth in *Ipswich?*

The new Local Plan will look to the future – to 2036. By then we may all be growing accustomed to driverless vehicles or electric vehicles as standard. Hydrogen-powered vehicles are also a possibility, and electric bicycles may be the norm.

Q58 What type of transport infrastructure for the future, such as electric charging points, should we plan for?

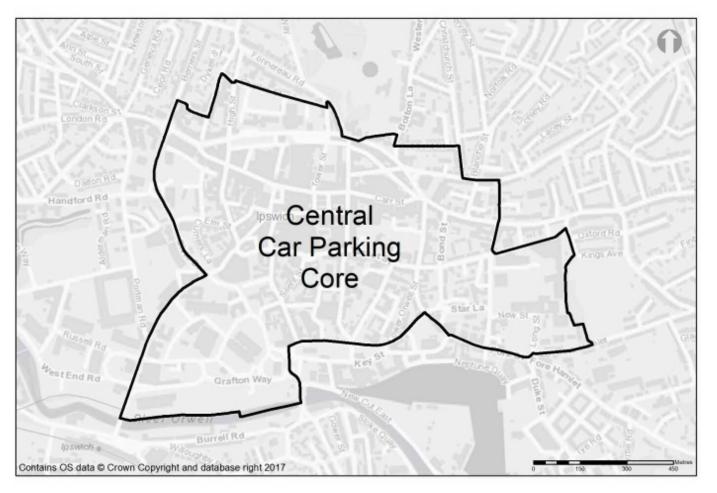


Infrastructure and Transport (continued)

Car parking provision is often debated. The current approach to car parking in central Ipswich is to focus short stay shopper parking in the 'Central Car Parking Core' which is shown on the map below. This is to support the retail and leisure functions of the town centre. Long stay commuter parking is provided outside the core. This policy approach is also aimed at encouraging commuters to use more sustainable modes and some employers back this up with green travel plans offering subsidised public transport to workers, for example.

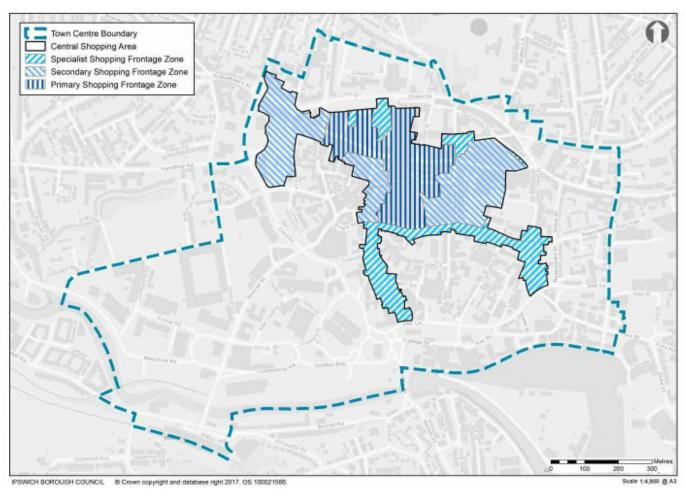
- **Q59** What should be the approach to planning for long stay commuter parking and short stay shopper parking in central lpswich?
- Q60 Is the boundary of the Central Car Parking Core in the right place?
- **Q61** Are additional car parks needed to serve town centre shops or leisure facilities? If so, where?





Town, District and Local Centres

The town centre and Central Shopping Area boundaries are defined in the adopted Local Plan and shown in the plan to the right. The Central Shopping Area is the part of the town centre where shopping (in retail use i.e. Class A1) is the primary land use. By keeping shopping activities within a relatively small area, people can browse on foot and compare goods and prices from shop to shop before making purchases. Some related activities are also permitted within the Central Shopping Area, such as cafes, banks and estate agents (Use Classes A2 to A5). More recently some larger leisure uses have also been permitted within the Central Shopping Area, for example at the Buttermarket Centre. The uses in the Central Shopping Area are controlled by defining Primary, Secondary and Specialist retail frontages through the Local Plan with policies to control the mix of uses in each frontage. The more extensive town centre outside the Central Shopping Area is the current focus for office, cultural and leisure activities, such as theatres, museums and Cardinal Park. In both areas, residential use is also encouraged – above shops in the Central Shopping Area and in mixed use schemes within the town centre. Mixing uses can help to maintain levels of activity and make places feel vibrant, fun and safe to be in so that when office workers go home, there are still other people around, living in the area or enjoying leisure activities.



Do you agree that the town centre and Central
Shopping Area boundaries are drawn in the right
place? Which streets would you like to see included
within the Central Shopping Area - or excluded from it?

Should the Council continue to define the Central Shopping Area as Primary and Secondary and Specialist retail frontages to control the mix of uses?

Town, District and Local Centres (continued)

The adopted Local Plan allocates the former Civic Centre and Police Station site on Civic Drive, known as Westgate, for major retail-led development with larger retail stores, and an element of housing.

Q64

Should the Westgate site continue to be allocated for large-scale retail development or should other uses be pursued?

The current Local Plan controls the development of new shops with a floor area larger than 200 sq m outside the Central Shopping Area and District Centres, as larger shops would compete with the centres. New retail proposals larger than 200 square metres (net) outside of defined centres therefore have to undertake a full retail impact assessment on the centres.





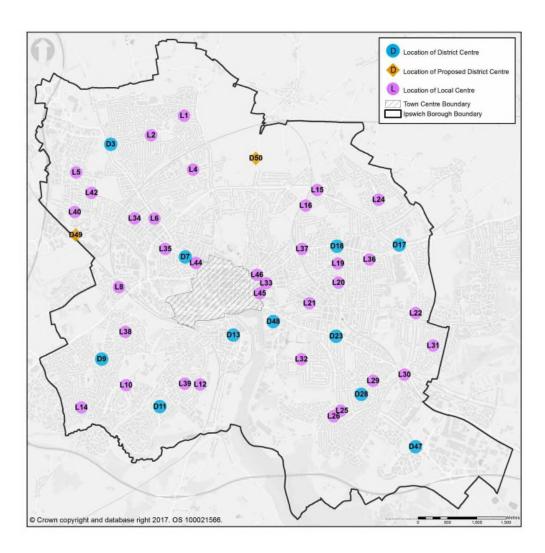
Should the threshold be changed? If you support a different threshold, please explain why.

There are currently 11 district centres in Ipswich with a further two not yet developed at Sproughton Road and the Ipswich Garden Suburb (see map overleaf). District and Local Centres perform an important role serving the day to day food and services needs of local residents. With regard to District Centres, the Retail and Commercial Leisure Study suggests that they have low vacancy and are vital and vibrant. They vary quite widely in their character, for example Stoke Park is now dominated by a single store and Ravenswood is purpose built, whereas Woodbridge Road is more dispersed and has shops interspersed with houses.

- **Q66** Should we continue to protect all of the district centres?
- Should we be planning for the expansion of any of the district centres, if so where?
- Q68 Should the District Centre allocation at Sproughton Road be extended to include the Morrisons store and the Namco Funscape bowling alley building on the other side of Sproughton Road?



Town, District and Local Centres (continued)



There are 34 local centres in Ipswich of varying size, scale and vibrancy.

Q69

Should we continue to protect all of these local centres? Do they still provide the function intended of them? Do any need re-allocating to different uses, or extending?

The current Local Plan also seeks to focus community facilities into centres, for example GP surgeries, schools and early years provision, so that people can make linked trips, e.g. pick up some groceries after visiting the doctor. This also informed the approach to housing density which is highest near centres. If more people live within walking distance of the facilities they need, it can help make sustainable transport choices more realistic.

Q70

Should this locational approach to community facilities continue?

The loss of pubs has been a concern in Ipswich. The Council currently requires a marketing strategy to be undertaken for a minimum of 12 months prior to applying for planning permission for change of use or redevelopment of a pub, in order to show that the use has no viable future.

Q71

Do you agree with the approach taken to protecting pubs? If not, what measures would you like to see put in place?

Tourism

Ipswich has plenty to offer the visitor throughout the year and has seen an increase in hotel provision in recent years. Beyond the museum, art gallery, theatre and concert venues, Ipswich also provides a packed calendar of cultural events throughout the year. It is estimated that approximately £34 million of tourism related income arrives in central Ipswich annually. However this figure forms only a small proportion of the overall tourism related income for the County.

How can Ipswich continue to increase its offer as a tourist destination?

Q73 Do you consider the range of hotels in the town offers the appropriate mix and choice to visitors?



Climate change and flood risk

The Ipswich Flood Defence Barrier is due to be completed in early 2018, which will reduce the risk of flooding to homes and businesses in Ipswich. It is likely, however, that there will still be a risk of pluvial (rainwater) flooding from heavier storms.

Q74

How can we adapt to pluvial flooding through design?



Sustainable Drainage Systems (SuDS) are designed to reduce the potential of new and existing developments with respect to surface water drainage, avoiding the need to use conventional pipes. They can take the form of swales, permeable surfaces, green roofs, soakaway infiltration structures, basins, ponds, or underground storage.

Q75

What is your experience of SuDS? Are they successful and an efficient use of space? What is their long-term effectiveness?

As temperatures rise in urban areas, adaptations can be made to the built environment to make a more pleasant environment, for example more shading from trees.

Q76

What measures do you consider can be introduced into urban areas to address climate change?

The energy performance of new residential buildings and their construction methods are now dealt with via Building Regulations. However, the Council is still able to encourage lower energy and water usage in new developments.

Q77

How can we encourage new developments to reduce carbon emissions and be climate change resilient? Should we require development to meet higher standards of energy efficiency and lower levels of water usage?



The NPPF requires Councils to consider identifying areas for renewable and low carbon energy development. The nature of the Borough rules out extensive uses such as wind farms and solar farms. Notwithstanding this, measures such as solar panels on roofs are possible at the building scale.

Q78

What measures should be encouraged to provide renewable and low carbon energy development within Ipswich?

Design



There is a strong approach to the design of buildings and the environment in Ipswich. Tools that are available to support the implementation of design policies include Building for Life 12, which sets 12 criteria to assess the design quality of homes and neighbourhoods. Lifetime neighbourhoods are promoted by the Government. These are neighbourhoods designed to be accessible for all regardless of age or disability. For land use planning, it means thinking about the mix of residential, retail and employment uses to ensure affordable, safe and inclusive access to a range of services; outdoor spaces and buildings that promote social contact; and locally accessible greenspace and natural environments.

What in your opinion makes a well-designed development? Do you feel that high quality design is being delivered in Ipswich?

Q80 Should Building for Life 12 continued to be used as a tool to improve the design quality of new development?

Ipswich contains some clusters of tall buildings. The area around the Civic Drive and Greyfriars was developed in the 1960s and, more recently, high rise development has taken place on the Waterfront. High rise building is an efficient way to use land, but its impacts on townscape, amenity and the historic environment need to be carefully considered.

Q81 Do you think the tall buildings around the Waterfront enhance the vibrancy of the area? Are there other areas of the town where additional tall buildings (of appropriate construction standards) would be appropriate?



Street trees often enhance the appearance of transport corridors and quiet streets. The plane trees on Yarmouth Road are a distinctive feature of the townscape and new trees have been planted in the town centre, for example at Giles Circus and as part of the Princes Street junction improvements. There is a cost associated with maintaining street trees, for example ensuring that fallen leaves do not obstruct road drains. Trees on development sites are currently protected through the Local Plan, which requires any mature trees felled to be replaced with two new ones. Other existing trees including in private gardens can be protected through tree preservation orders which operate outside the Local Plan system.

Q82 Do you feel more protection should be given to street trees? Do you have specific examples of trees which should be protected?

For some new visitors arriving in Ipswich, particularly by car, it may not be obvious when they have reached the town centre. For example, entering the town across Stoke Bridge or St Matthew's roundabout, it may not be immediately clear that it is the edge of the town centre. One way to reinforce the 'gateway' nature of such locations is to take a particular design approach to buildings.

Q83

Do you feel there needs to be greater attention to the architectural design of buildings in these locations?

Historic Environment

Ipswich has a rich heritage, in particular from the Anglo-Saxon period, and has a medieval street pattern. There are over 600 listed buildings, ten scheduled monuments, 15 conservation areas and three registered parks, gardens and cemeteries. Ipswich Borough Council also has a Local List of Buildings of Townscape Interest and a number of Urban Character Studies for areas of the Borough. There is a central area of archaeological importance and an Ipswich Urban Archaeological Database is being prepared.

National planning policy requires Local Plans to set out a positive strategy for the protection and enhancement of the historic environment.





What could be included in a positive strategy in the Local Plan to protect and enhance heritage assets?

Are the existing measures to control development in conservation areas effective, for example requesting that new shopfronts be constructed from high quality materials and respect the character and appearance of the building and street scene? Are there any other ways we can enhance conservation areas?

Are there additional areas which you consider should be designated as conservation areas?

Q87 How could our archaeological assets be protected?

Q88 How can Ipswich better utilise its heritage assets and archaeology?

489 How should the Waterfront be further developed as a heritage feature of the town?



Open space and biodiversity

There are many areas of open space within the Borough, across a range of types and sites, including formal parks, allotments, playing fields and the Orwell Country Park. The Council has an adopted approach to the provision and protection of open space through applied standards per head of population. Currently, larger development sites are required to incorporate on-site open space provision, whereas smaller developments may make a financial contribution which allows an existing facility to be enhanced. The cost of maintaining open spaces needs to be considered, as maintaining a large number of small spaces is less efficient that maintaining fewer large areas of open space.

- Q90 Should the Council continue to apply a standards approach to the provision of new open space per head of population?
- Q91 Is your perception that there is too much, too little or about the right amount of open space in the Borough?
- There is a deficit of provision for teenagers facilities such as teen shelters and multi-use games areas. What sort of provision should be made and where?

There is a deficit of Accessible Natural Greenspace in north Ipswich. A new country park at the Ipswich Garden Suburb will be provided as the development is built out. Do you feel there is a need for more Accessible Natural Greenspace in addition to this in north Ipswich?

What is the minimum size of development which should be required to provide on-site open space?

Q95 Which models for managing open spaces are effective?



Open space and biodiversity (continued)



Ipswich has developed a Wildlife Network to support biodiversity in the town and opportunities for people to have contact with the natural world, which is beneficial to health and wellbeing. There are many initiatives in Ipswich to support biodiversity, ranging from the Greenways Project to the Ipswich hedgehog officer to 'Urban Buzz', a project dedicated to supporting pollinating insects, which are in serious decline. Urban areas provide important opportunities for habitat creation, including through new developments. The Local Plan also protects existing designated habitats ranging from the internationally protected Orwell Estuary Special Protection Area to the Local Nature Reserve at Piper's Vale.

The current Local Plan proposes the establishment of a 'green rim' around Ipswich to provide recreational access to the countryside and a wildlife corridor. The proposal originated from the Haven Gateway Green Infrastructure Study in 2008. However to date it has remained a general concept rather than being geographically defined on a map.

Are there existing routes around the fringe of Ipswich for cycling and walking that could form the core of the green rim? How wide would the green rim need to be in order to be an effective recreational and wildlife resource?

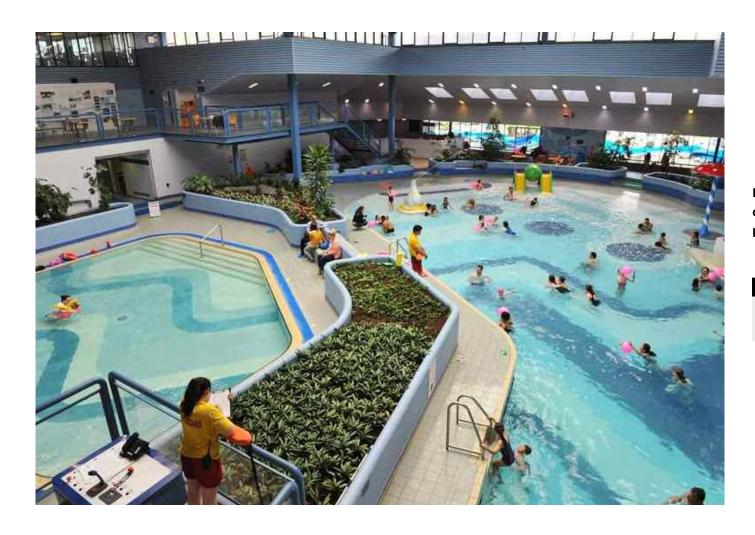




Q97 How can the Ipswich Wildlife Network be further enhanced and linked into surrounding areas?

Should more areas of the Borough be designated as Local Nature Reserves, and if so where?

Sport and Leisure



Ipswich has many sport and leisure facilities in the town centre and around the Borough. These include swimming pools, sports centres, cinemas and theatres.

Q99

Does Ipswich offer the appropriate mix of sport and leisure facilities you would expect in a town of its size? What other facilities could it offer?

Demography, social inclusion and health

The proportion of 'elderly' households in Ipswich is increasing. Given the growth in the older population, changes in the social care system and the higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options in future.

Ipswich also has a younger demographic profile than the neighbouring districts. Young people may struggle to afford to buy/rent a home of their own and may therefore opt to stay at home for longer. Both of these factors could increase the demand for larger dwellings to accommodate multiple generations of a family.

Q100

How should we best plan for an ageing population in the Borough?

Q101

The current Local Plan safeguards land for new or extended primary schools and sets out standards for children's play provision. Are other planning responses needed for the relatively younger demographic in Ipswich?

21.5% of all children in Ipswich live in income deprived households and income deprivation runs at 16.3% of all people in Ipswich. Both of these figures are higher than Suffolk averages.

Currently there are several ways in which planning policy responds to deprivation within the Ipswich community. One is to protect employment areas across the whole Borough so that jobs are potentially available close to where people live. The Local Plan also promotes accessibility to new development by a range of modes of transport so that it is not car dependent. This is significant in a Borough where nearly 28% of households do not have a car or a van. The Local Plan also ensures that land is safeguarded for new schools where needed and protects the Education Quarter.

Q102

In what other ways could the land use plan help to tackle issues of deprivation and inequality in Ipswich?

Health inequalities are present in Ipswich. The Local Plan already includes a number of measures which can impact positively on health through identifying sites for GP surgeries, enabling housing to be delivered, ensuring a good quality of development, protecting open spaces and encouraging more active modes of transport.

Q103

How else should the Local Plan tackle health inequalities?

The way in which health services are delivered is changing. GP surgeries are being brought together into fewer, larger facilities.

Q104

What criteria should guide the location of such facilities? Should they be located in District Centres?

Q105

Are there sites or locations where you think they are needed?



Any other issues?

Q106

Parts 1 and 2 of this consultation paper have considered many different issues affecting Ipswich. Are there any other issues not mentioned here, which relate to land use in Ipswich, about which you would like to comment?



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