

# **Ipswich Borough Council Local Plan Review 2018 – 2036**

## **IBC Response to Inspectors Letter 03/12/2020 – Matters 4 (Employment and Business Growth) & 5 (Retail Development and Centres)**

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## Q1 - Employment land need and supply (Questions 64 & 65):

*The Council's HPS and the supporting Ipswich Economic Area Sector Needs Assessment (ESNA) Final Report [D2] and Ipswich Economic Area Employment Land Supply Assessment (ELSA) report [D1] explain the need for a surplus of employment land in Ipswich to ensure sufficient land is available to meet demand arising from the town's sub-regional economic role. However, this is not adequately explained in the supporting text to Policies ISPA1 and CS13 in the Core Strategy and Policy SP5 in the Site Allocations DPD. Therefore, main modifications (MMs) will be required to the explanatory text to these policies to ensure the Plan is justified in respect of the amount of employment land allocated for business, industrial and storage/distribution uses.*

### IBC Response:

- 1.1 The supporting text to Policies ISPA1, CS13 of the Core Strategy and Policy SP5 of the Site Allocations DPD have been modified to explain the need for a surplus of employment land in Ipswich as requested. The modifications are presented in Appendices 1, 4 and 13.

## Q2 - Changes to the Use Classes Order (UCO) (Question 67):

### Part 1

*Under the changes to the UCO which came into effect on 1 September 2020, Class B1 Business uses now fall within the new Commercial, Business and Service Use Class E along with the former A1, A2, A3 and parts of D1 and D2 Use Classes, allowing changes between these uses without the need for planning permission. B2 General Industrial and B8 Storage or Distribution remain as separate use classes. The Plan needs to be modified to reflect these changes, to ensure it is consistent with national policy. This applies in particular to Policies CS13, DM33 and SP5 and their supporting text, but the Council should review the rest of the Plan, including the Site Sheets, to ensure that all references to Class B1, B2 and B8 uses are consistent with the revised UCO. Given the need to plan for the range of employment floorspace requirements set out in the evidence, we suggest the use of the terms business, office, research and development (R&D), industrial, general industrial, storage and distribution as appropriate to distinguish the types of employment use for which allocations are made or employment land protected.*

### IBC Response:

- 2.1 The Council has reviewed the ILPR and proposed modifications to reflect the changes to the Use Classes Order. These are presented in Appendices 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 16 and 17. Please note, in preparing modifications to site sheets IP043 and IP119 to reflect the UCO changes, it was noted that there were discrepancies in terms of the acceptable secondary employment uses that were listed in Policy SP5 and the respective site sheets. Therefore, the Council has taken the opportunity to modify the secondary uses

to ensure consistency. These will also be reflected in the relevant mixed use policy for these sites which the Council is responding to separately, as well as the other changes to SP2 and SP5 that are being responded to separately.

## Part 2

*In its response to IQ15, the Council suggests the use of conditions on planning permissions for development involving the new Use Classes, to ensure the Plan remains effective in protecting land uses required to meet the overall development needs of the borough and the ISPA. If this is a reference to the removal of permitted development rights, for example for office, R&D and industrial floorspace permitted under a Class E scheme, to retain control over changes to other uses within the same Use Class, the justification for this should be set out in the Plan, for which MMs will be required. The basis for this policy approach would need to be consistent with national policy on the use of conditions, including the guidance on the appropriate use of conditions to restrict permitted development rights contained in the Planning Practice Guidance (PPG).*

## IBC Response:

- 2.2 The justification for the use of conditions to remove permitted development rights of new employment development that falls under Use Class E(g) from changes of use to other non-E(g) uses is twofold.
- 2.3 The first, and most important reason, is to ensure that the Council is able to allocate and deliver sufficient land for employment development to meet its identified needs as set out in the ILPR. This is consistent with Paragraphs 20(a), 80 and 81 of the NPPF. The Council has ensured that there is a wide mix of types of employment land available including sites that can comfortably accommodate uses which are sui generis or less desirable but essential, such as paint spraying and car breakers and car repair businesses through to more flag ship sites. The objectives of planning are best served when the power to attach conditions to a planning permission is exercised in a way that is clearly seen to be fair, reasonable and practicable. It is important to ensure that conditions are tailored to tackle specific problems. Different types of employment tend to cluster together and sometimes work together so PD rights removal may be required to maintain existing businesses or to attract high end businesses. However, this will not be standardised or used to impose broad unnecessary goals but will be applied only where necessary. Section 70(1)(a) of the Town and Country Planning Act enables the local planning authority in granting planning permission to impose “such conditions as they think fit”.
- 2.4 The other justification is to prevent Use Class E(g) employment development on allocated employment sites and existing employment areas, many of which are in out-of-town locations, from being repurposed for retail uses at a later date by way of a change of use. Retail development in out-of-centre locations would compromise the ability of the Council to deliver its retail requirement in the Central Shopping Area and defined centres, as well as drawing trade away from these centres, undermining their vitality and viability. The Council would be unable to require appropriate sequential tests and retail impact assessments and considers it necessary to assess any change of use to a retail use in an out of centre location. This approach accords with Paragraphs 85, 86, 87, 89 and 90 of the NPPF.

### Q3 – Policy DM33 – Protection of Employment Land (Question 68):

*We note that paragraph 120 of the NPPF continues to apply the ‘no reasonable prospect’ test in considering the alternative use of allocated sites. However, the factors to be taken into account in assessing whether there is a realistic prospect of an allocated site being developed for its intended use, as set out in the PPG2, are broader than the requirement to produce evidence of the active marketing of a site. Accordingly, Policy DM33 and its supporting text require modification to reflect the criteria in the PPG, in order to ensure consistency with national policy.*

IBC response:

- 3.1 The Council has proposed main modification to paragraph 9.33.4 of the reasoned justification of Policy DM33 to reflect the criteria in the PPG. This is shown in appendix 10.

### Retail Development and Centres

### Q4 – Retail Floorspace Need and Supply (Question 69):

*Paragraph 85d) of the NPPF expects plans to allocate sites in town centres to meet the scale and type of development needed, looking at least 10 years ahead. Table 3.2 of the Retail Position Update Statement (RPUS), August 2019 [D7], identifies a need for 9,900 sqm of comparison retail floorspace to 2029 and 14,300 sqm to 2031. However, Policy CS14 only seeks to provide for 10,000sqm of comparison retail floorspace to 2031 and the sites allocated in Policies SP10 and CS10 total just 9,710 sqm of comparison retail floorspace. The Council explains that this would meet the need for the 10 year interval to 2029. However, at adoption (2021 according to the LDS) the Plan would be expected to look 10 years ahead to 2031. As it stands, therefore Policies CS14, SP10 and CS10 do not make adequate provision for the comparison retail needs of the Borough to 2031. Therefore, the Plan is not positively prepared, justified or consistent with national policy in respect of its provision for retail floorspace. MMs are required to Policies CS14 and SP10 and their supporting text to ensure the Plan makes provision for the up to date comparison retail floorspace needs of the borough to 2031 as identified in the RPUS.*

IBC Response:

- 4.1 The Council has prepared a separate paper responding to this request. This is attached as appendix 18 to this document.

## Q5 – Policy SP10 – Effect of the Changes to the UCO on Retail Site Allocations (Question 70):

*Policy SP1 provides clarification about how proposals for non-retail uses on sites allocated for retail development in Policy SP10 should be determined. However, we consider that both Policy SP10 and its supporting text require MMs to reflect the changes to the UCO. They refer to Class A1 and A2 uses, which no longer exist. Also if the Council's proposed approach to safeguarding new retail floorspace is to seek to apply conditions to restrict permitted development rights for changes to alternative uses within the new Class E, the justification for this should be set out in the Plan and, as above, would need to be consistent with national policy on the appropriate use of conditions.*

### IBC Response:

- 5.1 The Council has prepared main modifications to reflect the changes to the UCO. These are presented in appendix 15.
- 5.2 The Council has provided the justification for the use of conditions to restrict permitted development rights in the response to question 2 of this document.

## Q6 – Relationship between policies in the CSP and SAP:

*The Council's proposed MMs in response to Question 72 are noted. We also note there are other policies in the CSP which reference actions to be taken in the SAP in the future. For example, Policy D27 states that 'sites for major retail investment will be allocated in the SAP'; and Policy CS14 that 'through the SAP the Council will amend the CSA and frontage zones to deliver flexibility' (albeit the frontages appear to have been amended through Policy DM27 in the CSP). Delegating non-strategic policy changes to the SAP would be appropriate if the CSP were being examined in advance of the preparation of the SAP. However, the two DPDs have been submitted together, and, therefore, policy wording such as this lacks clarity and effectiveness. We invite the Council to review the two DPDs and consider MMs to these and other relevant policies, as necessary to ensure the relationship between the two parts of the Plan is effective and clear.*

### IBC Response:

- 6.1 The Council has prepared main modifications to provide greater clarity and effectiveness as requested. These are presented in appendices 5 and 6.

## Q7 – Policies DM27 and DM30 – Effect of Changes to the UCO on policies for the mix of uses and frontages within the Central Shopping Area, District and Local Centres (Question 73):

*MMs are required to Policies DM27 and DM30 and their supporting text to reflect the September 2020 changes to the UCO and allow for the intended flexibility in the range of uses permitted in the new Use Classes E, F1 and F2. In preparing these, the Council should take into account paragraph 7.1 of the Explanatory Memorandum to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, which explains that the changes were made 'to better reflect the diversity of uses found on high streets and in town centres and to provide the flexibility for businesses to adapt and diversify to meet changing demands. This is considered particularly important at the present time as town centres seek to recover from the economic impact of Coronavirus. Modern high streets and town centres have changed so that they now seek to provide a wider range of facilities and services, including new emerging uses, that will attract people and make these areas viable now and in the future'.*

### IBC Response:

- 7.1 The Council has prepared main modifications to Policies DM27 and DM30 to reflect the changes to the UCO and allow for the intended flexibility. The Council has evaluated the percentage thresholds for each policy, where appropriate, to reflect the changes in use class order. These thresholds percentages are informed by the percentages recorded in the Central Shopping Area and District and Local Centre Retail Monitoring Reports. The main modifications are presented in appendices 6 and 7 of this document.

## Q8 – Policy DM32 – Retail Proposals Outside Defined Centres (Question 73):

*We note the suggested MMs to Policy DM32, but, as modified, it would require all retail proposals to be subject to the sequential test (ST). However, paragraph 88 of the NPPF says the ST should not be applied to proposals for smaller scale rural development. Accordingly, the policy requires further modification to ensure it is consistent with national policy. Changes are also necessary to the supporting text to Policy DM32 to remove the 200sqm threshold and to ensure references to use classes are consistent with the changes to the UCO.*

### IBC Response:

- 8.1 The Council has proposed main modifications to include reference to the ST not being applied to proposals for smaller scale rural development. The Council has also proposed MMs to clarify the 200sqm threshold applying to all retail proposals in terms of the need for a retail impact assessment. These modifications are presented in appendix 9 of this document.

## Land allocated for Employment uses (Policy SP5)

### Q9 – Status of Site Sheets (Question 170):

*We note the suggested modification (MM74) to include Table 3 within Policy SP5, but it remains unclear how the information contained on the site sheets for each site at Appendix 3 is to be regarded. For effectiveness, we consider the policy requires further modification to ensure development proposals are required to address the constraints identified in the Site Sheets.*

#### IBC Response:

- 9.1 The status of site sheets has been addressed as part of a separate response by the Council. In addition, mixed use sites and those sites requiring master planning will no longer have site sheets. Site sheets have been included as guidance in the Sites Allocation DPD. The main modifications proposed to site sheets in appendix 17 are shown for information purposes.

### Q10 – IP141a - Land at Futura Park, Nacton Road (formerly the Cranes Site)

*We invite the Council to include the suggested modification (MM133) to the Site Sheet for IP141a in the proposed MMs.*

#### IBC Response:

- 10.1 Noted. This is included the proposed main modifications schedule.

## Allocations for Open Space and Leisure Uses or Community Facilities

### Q11 – Policy SP6 – Land Allocated and Protected as Open Space (Question 182):

*We note the proposed MM to Policy SP6 in respect of the allocation of site IP083 for public open space. However, Policy SP6 is still ambiguous. It is unclear from the policy and site sheet for IP083, whether it allows for development, including buildings, within the open space, subject to retaining the river path, or whether development simply refers to groundworks to create the park. We presume it is the latter, but we consider modifications are necessary to make this clear and ensure the policy is effective.*

IBC Response:

- 11.1 The Council has proposed main modifications to Policy SP6 to the effect of specifying “groundworks” in the policy wording. This is shown in full in appendix 14.

Q12 – Policy SP8 – Orwell Country Park Extension (Question 190):

*We invite the Council to include the suggested modification (MM6.6) in the proposed MMs to ensure the basis for the assessment of proposals for the extension is clear.*

IBC Response:

- 12.1 Noted. This is included the proposed main modification schedule.



NB – Modifications are consolidated here (not in full). Only paragraphs/ policy wording that are affected by the proposed modifications in this response document are shown here.

## Appendix 1 – Policy ISPA1 Modifications – Response to Q1 & Q2

Table 8.3 – Baseline jobs growth and employment land requirements in the ISPA

	Baseline jobs growth (2018-2036)	Minimum employment land requirements ( <del>B1-E(g)</del> , B2 and B8 uses) (2018 – 2036)
Babergh	2,970	2.3ha
Ipswich	9,500	23.2ha
Mid Suffolk	5,270	7.7ha
Suffolk Coastal	6,500	11.7ha
IFEA	24,060	44.9ha

8.16 In respect of the employment land requirement, the ESNA makes clear that the 23.2ha figure is the minimum quantum of land that should be planned for. Ipswich is identified as a ‘travel to work’ area and a key employment centre for the wider area. The importance of the Borough in supporting economic growth and productivity in the wider sub-region is reflected in the New Anglia Local Enterprise Partnership Norfolk and Suffolk Economic Strategy (2017) and the Suffolk Growth Framework (2019). The ELSA also recognised that higher levels of employment growth could be achieved and that there is a need to plan for a range and choice of sites to meet the needs of different potential employers. Therefore, through Policy CS13 a positive approach is taken to facilitating employment provision above the minimum identified requirement and Policy SP5 of the Site Allocations DPD allocates a quantum of land greater than the minimum requirement.

**POLICY CS2:  
The Location and Nature of Development**

**POLICY CS2: THE LOCATION AND NATURE OF DEVELOPMENT**

The regeneration and sustainable growth of Ipswich will be achieved through:

- a. Focusing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter (formerly Ipswich Village), and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development;
- b. Allocating sites for future development at the northern end of Humber Doucy Lane for housing and associated infrastructure, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4);
- c. Working with neighbouring authorities to address housing need and delivery within the Ipswich housing market area;
- d. Focusing major new retail development into the Central Shopping Area with smaller sites identified in district centres;
- e. Focusing new office, hotel, cultural and leisure development into Ipswich town centre;
- f. Directing other employment uses (~~B1~~E(g) (except office), B2 and B8) to employment areas distributed in the outer parts of the Borough, and there will be a town centre first approach to the location of offices;
- g. Dispersing open space based (non-commercial) leisure uses throughout the town with preferred linkage to ecological networks and/or green and blue corridors, and protecting the countryside from inappropriate development; and
- h. Development demonstrating principles of high quality architecture and urban design and which enhances the public realm, ensures the security and safety of residents and is resilient to climate change.

## Appendix 3 – Policy CS10 Modifications – Response to Q2

### **POLICY CS10: Ipswich Garden Suburb**

<b>Land use</b>	<b>Approximate area in hectares</b>
<b>Public Open space, sport and recreation facilities including dual use playing fields</b>	<b>40</b>
<b>A Country Park (additional to the public open space above)</b>	<b>24.5 (minimum)</b>
<b>Residential development of approximately 3,500 dwellings</b>	<b>100</b>
<b>A District Centre located within Fonnereau Neighbourhood, providing:</b>	<b>3.5</b>
<ul style="list-style-type: none"> <li>i. A maximum of 2,000 sq m net of convenience shopping, to include a medium/large supermarket between 1,000 and 1,700 sq m net;</li> <li>ii. Up to 1,220 sq m net of comparison shopping;</li> <li>iii. Up to 1,320 sq m net of services uses <del>including non-retail Use Class A1, plus A2 to A5 uses to include only</del> <u>restaurants, cafes, offices, public house and hot food takeaway uses;</u></li> <li>iv. Healthcare provision;</li> <li>v. A library;</li> <li>vi. A police office;</li> <li>vii. A multi-use community centre; and</li> <li>viii. Residential accommodation in the form of appropriately designed and located upper floor apartments.</li> </ul>	
<b>Two Local Centres located in Henley Gate and Red House neighbourhoods, together providing:</b>	<b>1.5 including 0.5ha per local centre in the Henley Gate and Red House neighbourhoods and 0.5ha within the Henley Gate neighbourhood for the country park visitor centre and community centre.</b>
<ul style="list-style-type: none"> <li>i. Up to 500 sq m net of convenience retail floorspace</li> <li>ii. Up to 600 sq m net of comparison retail floorspace; and</li> <li>iii. Up to 500 sq m net of service uses <del>including non-retail Use Class A1, plus Classes A2 to A5 to include only</del> <u>restaurants, cafes, offices, public house and hot food takeaway uses;; and</u></li> </ul>	

**iv. Community Centre use (which could include Country Park Visitor Centre use) located in Henley Gate**

**A secondary school within the Red House neighbourhood with access from Westerfield Road 9**

**Three primary schools (one in each neighbourhood) 6**

**Primary road infrastructure, including a road bridge over the railway to link the Henley Gate and Fonnereau neighbourhoods**

## Appendix 4 – Policy CS13 Modifications – Response to Q1 & Q2

### **POLICY CS13: Planning for Jobs Growth**

#### **POLICY CS13: PLANNING FOR JOBS GROWTH**

**The Council will promote sustainable economic growth in the Ipswich Strategic Planning Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of approximately 9,500 jobs in the Borough between 2018 and 2036 by:**

**a. allocating a range and choice of sites amounting to at least 23.2ha of land for employment development (in Use Classes ~~B1-E(g)~~, B2 and B8) through the Site Allocations and Policies (incorporating IP--One Area Action Plan) Development Plan Document. Conditions to prevent changes of use from employment uses in Use Class E(g) to non-employment uses may be applied to permissions where appropriate;**

- 8.166 The Council has updated its economic evidence through joint studies for the Ipswich Economic Area. The Economic Sector Needs Assessment (ESNA) 2017 identifies the amount of land needed for ~~B-class-E(g)~~, B2 and B8 employment development in the Borough, and the Employment Land Supply Assessment 2018 assesses the quality of employment land within the Borough. The Employment Land Supply Assessment has informed the Strategic Housing and Employment Land Availability Assessment. As a result, some land previously allocated or protected for employment uses has been re-allocated to residential or mixed uses through the Local Plan Review. The Employment Sector Needs Assessment identifies a minimum need for 28.3ha of employment land in Ipswich 2014 to 2036. A pro rata adjustment to update the baseline date to 2018 results in a calculation of at least 23.2ha.
- 8.169 The Economic Strategy for Norfolk and Suffolk has been developed by the New Anglia Local Enterprise Partnership (LEP) and endorsed by the Council. The overall objective of the LEP's strategy is to generate growth across all sectors, focusing on creating high value, highly skilled jobs and industries, whilst also providing the technical skills, access to innovative techniques and support that all businesses and the wider workforce needs to succeed. Ipswich has been identified as one of six 'Priority Places' in the Economic Strategy for Norfolk and Suffolk, as evidence shows there are significant opportunities and commitment for continued growth within the town. The plan sets out key development and investment targets for Ipswich. The high level ambitions set out in the Economic Strategy for Norfolk and Suffolk, as well as the Suffolk Growth Framework, are supported by the Ipswich Borough Council Economic Development Strategy. The ESNA makes clear that the 23.2ha figure is the minimum quantum of land that should be planned for. The ELSA also recognises that higher levels of employment growth could be achieved and that there is a need to plan for a range and choice of sites to meet the needs of different potential employers. Policy CS13 takes a positive approach to facilitating employment provision above the minimum identified requirement. The Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Development Plan Document will translate the overall land requirement into

~~sites~~ achieves this by allocating 28.34ha of land for employment uses. The Council will ensure that enough land is available, including a variety of site sizes and locations to suit different employment-generating activities. Appropriate employment-generating sui generis uses are defined through policy DM33.

- 8.170 It should be noted that the jobs growth aspiration covers all sectors and not just the employment use classes of ~~B1 business~~ E(g) (formerly Use Class B1), B2 general industry and B8 warehousing and distribution.
- 8.177 Under the September 2020 amendments to the Town and Country Planning (Use Classes) Order 1987 (as amended), employment uses that were formally B1 prior to September 2020 are now in the same use class (E) as a wider range of uses, including shops, restaurants and cafes. The employment uses that were formally B1 are identified under part “g” of Use Class E (E(g)). Conditions may be applied on employment development that falls within Use Class E(g) to prevent changes of use from Use Class E(g) to other Use Class E uses. The use of these conditions is justified to ensure that the Council is able to deliver sufficient land for employment development, and, to ensure that inappropriate development, such as retail in out-of-centre locations, does not occur which could undermine the vision, objectives and overall strategy of the Local Plan Review. Each application will be judged on its own merits as to whether conditions are necessary in each instance.

**POLICY CS14:**  
**Retail Development and Main Town Centre Uses**

**POLICY CS14: RETAIL DEVELOPMENT AND MAIN TOWN CENTRE USES**

The Council will promote high quality investment and development in Ipswich Central Shopping Area, to maintain and enhance its attraction and market share, and strengthen its regional role.

The Council ~~will~~ has allocated land for 10,000 sq.m net of new comparison retail floorspace up to 2031, in accordance with the national requirement to allocate suitable sites in town centres to meet likely need looking at least ten years ahead. This reflects the Ipswich Vision Strategy for the town centre, the scale of housing growth set out in the plan, latest household projections and the most up-to-date evidence and monitoring of market conditions and the changing nature of the high street. The Council will review retail need within five years to ensure that this approach best supports the success of the town centre. The need for convenience floorspace over the same period will be met by the new District Centre at Ipswich Garden Suburb allocated through policy CS10.

In the district centres and local centres, the Council will encourage retail development of a scale appropriate to their size, function and catchment.

Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document, the Council ~~will~~ has:

- Amended the Central Shopping Area and frontage zones to deliver flexibility;
- Strengthened north-south connectivity through the Town Centre; and
- Allocated sites within defined centres for retail development.

This will enable the delivery of additional floorspace to diversify the retail offer.

The Council will direct other town centre uses including offices, leisure, arts, culture, tourism and hotel developments into the town centre area, with some provision being appropriate in the Central Shopping Area and Waterfront, in recognition of the areas good accessibility by public transport, cycle and foot.

The Council will also promote environmental enhancements and urban greening to the town centre through the Public Realm Strategy Supplementary Planning Document and improved public transport accessibility.

- 8.182 An amended Central Shopping Area with additional retail site allocations will go some way to addressing these gaps in the offer, subject to general market conditions. Sites ~~will~~ are allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development

Plan Document (policy SP10). In addition to the allocation of sites, the amount of net comparison floorspace proposed takes into account the scale of housing growth set out through policy CS7 and vacant units present in the Central Shopping Area, such as the former British Home Stores building (3,316 sq. m net). Clearly delivery will be the key to success, and the Council will work with others and through its own land holdings and as local planning authority to achieve it. In addition the Council will evaluate the practicalities of improving evening access in the principal pedestrianised streets after normal trading hours, to encourage the use of facilities in the evening.



## Appendix 6 – Policy DM27 Modifications – Response to Q2, Q6 & Q7

### **POLICY DM27: The Central Shopping Area**

9.27.1 The Government recognises that the role of town centres is changing from its traditional retail high street approach. Town centres need to be dynamic and flexible in order to remain relevant and to be able to compete effectively with other retail sources such as on-line shopping as well as accommodating wider town centre uses. This is reflected in the Government NPPF and updated PPG 22 July 2019. The Government advises that Councils review the town centre and create character zones.

**The Council will support the town's vitality and viability by promoting and enhancing appropriate development in the Central Shopping Area, building in flexibility to meet the needs of retailers and leisure businesses appropriate to the Central Shopping Area.**

**The Central Shopping Area comprises the Primary, Secondary and Specialist Shopping Zones, which are defined on the IP-One Area inset map. Sites identified as suitable for major retail investment ~~will be~~ are allocated in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.**

**Class ~~E~~ A1 ~~retail~~ use (commercial, business and service) should remain the predominant use at all times in the Central Shopping Area, to ensure the strategic ~~retail town centre~~ function of Ipswich is maintained.**

**a. Primary Shopping Zone – this is the principal retail centre for Ipswich. ~~Other complementary uses to the principal retail function will be permitted such as coffee shops, hairdressers and restaurants. However, 70% of All uses in the primary shopping zone are required to be primary retail commercial, business and service uses on the ground floor. An exception to this is the first floor of the Sailmakers Shopping Centre. Here A5 takeaway uses will not be permitted. Complementary uses such as hairdressers, coffee shops and restaurants will be supported.~~**

**b. Secondary Shopping Zone – ~~A2 A5 uses, public houses, drinking establishments, takeaways, betting shops and payday loan shops and other main town centre uses (as defined by the NPPF (2019)) will be permitted where they will not exceed 35%15% of the units within the zone, provided the proposal does not create a concentration of more than three adjacent non-A1class E units, and the site is not adjacent to an existing non-A1class E use within the same Use Class as the proposal. No more than 10% of the total identified units within the Secondary Shopping Zone will be permitted for A4 or A5 public houses, drinking establishments or takeaway uses. The Council will support Local Development Orders which help to maintain an appropriate mix of uses and will support the use of pop-up shops and restaurants for up to 3 years in accordance with the General Development Order both to bring vacant units back into use and to allow entrepreneurs the opportunity to test their business models. This could also include limited use of training centres (F.1) and other such uses appropriate to the secondary shopping zone.~~**

**c. Specialist Shopping Zone – This zone comprises of non-multiple retail uses, specialist shops such as music shops and services such as beauticians and hairdressers and jewellers or bespoke clothing and bags. Many of the units**

are listed buildings. It is in this zone and the secondary shopping zone where there are the majority of unlet units. Again, the Council supports the use of unlet units for pop-up shops and restaurants ~~as in the Secondary shopping zone above. Wider NPPF defined Main town centre uses, other than retail, as defined in the NPPF~~ will be permitted where they will not exceed 40% of the units. No more than 35% of the total identified units within the identified sub-group of the Specialist Shopping Zone will be permitted for ~~A2, A4 or A5 public houses, drinking establishments and takeaway uses.~~

Proposals for non-A1 class E uses that would exceed the maximum thresholds outlined for the zones above will only be permitted in circumstances where it can be robustly demonstrated that such a change would be beneficial to the vitality and viability of the shopping zone, such as uses that help to attract people to visit the centre during the evening, as well as flats above shops.

~~A3, A4 and A5~~ Restaurants (where permission is required), public houses, drinking establishments and takeaway uses and other main town centre uses will only be permitted where they have no detrimental effect on the residential amenities of nearby residents ~~accommodation~~ in terms of noise, fumes, smell, litter and general activity generated from the use and retain an active frontage.

Mixed use development, including ~~B1 office, A2 financial~~ and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Central Shopping Area, provided there is a ground floor use in accordance with the zone guidance above.

The Council will not grant planning permission for the use of a ground floor unit to a use falling outside ~~classes A1 to A5~~ Class E, public houses, drinking establishments and takeaway uses in Primary Shopping Zones; and falling outside ~~A1 to A5~~ Class E, public houses, drinking establishments and takeaway uses or a suitable town centre use as defined by the NPPF in the Secondary Shopping Zones.

The Council will support opportunities to use vacant shop units ~~fronts~~ for uses such as pop-up shops and restaurants ~~to promote the Town Centre in accordance with the General Development Order requirements and to help potential entrepreneurs test their business models for up to 3 years.~~ It will also work closely with other organisations so that a shared vision is created for the 21st century.

The Council also supports the retention of the open market and will work to ensure it meets the needs of residents and visitors to the Borough.

Developers need to also ensure that proposals contribute positively to the objectives of the “Ipswich Town Centre and Waterfront Public Realm Strategy” SPD and “Shopfront Design Guide” and other relevant SPD. The Council will expect contribution to the creation of a dementia-friendly town centre which is fit for all.

9.27.2 Protecting the vitality and viability of the town centre and district and local centres is a key part of national policy and the importance of the town's shops is set out in the strategic policies of the Core Strategy. The NPPF advises that town centre policies should:

- Define a network and hierarchy of town centres and promote their long-term vitality and viability;
- Define the extent of centres and primary shopping areas;
- Retain and enhance existing markets;

- Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed;
- Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre, where suitable and viable town centre sites are not available; and
- Recognise that residential development often plays an important role in ensuring the vitality of centres.

- 9.27.3 The purpose of the Central Shopping Area (CSA) is to focus ~~retail activity~~ town centre uses within a defined, concentrated area and enable visitors to easily combine other activities in the centre with their shopping trip, such as meeting friends at a café, going to the bank or having a haircut. The concentration of activities benefits shoppers who wish to compare goods and prices in different shops before making their purchases or combine several activities in one trip, and retailers who want to see the maximum footfall possible outside their store. The policy approach of concentrating such activity within a defined area supports the vitality and viability of the centre.
- 9.27.4 The CSA boundary has been amended, to include additional land at Princes Street and exclude the former police station at Elm Street. These changes respond to evidence in the Ipswich Retail and Commercial Leisure Study 2017. The Council considers that the boundary changes will help to strengthen the CSA's vitality and viability. Annual monitoring of town centre indicators such as shop vacancy will continue to be used to assess the CSA's health.
- 9.27.5 Within the CSA, the predominant land use at ground floor level should be commercial, business and service uses ~~shops~~ (i.e. Use Class A1 ~~retailing E~~). However, there are other uses which complement ~~A1 shops these uses~~, which also have a role to play within the CSA, for example: ~~financial and professional services such as banks (class A2), cafes and restaurants (class A3), drinking establishments, (class A4) hot food takeaways (class A5)~~ and main town centre uses including leisure, entertainment, offices, arts, culture and tourism and residential uses.
- 9.27.6 The CSA is therefore divided into three 'Shopping Zones'. The Primary Shopping Zone is the area where the greatest concentration of ~~A1 retail~~ commercial, business and service uses is expected. It is a relatively small area which largely coincides with the 'prime pitch' for retailers and it has the highest rents and footfall. The Secondary Shopping Zones are generally characterised by lower rents and footfall than the Primary Shopping Zone. In these areas, the focus remains on ~~A1 retailing~~ commercial, business and service uses, but a greater diversity of uses is permitted. The Specialist Shopping Zones contain the greatest diversity of uses. Shops tend to be in smaller units occupied by more specialist retailers. Some of the streets in this area consist of attractive historic buildings, which give them a special character, for example St Peters Street and Fore Street. For the purposes of the sequential approach to locating new retail development, only the Primary and Secondary Shopping Zones defined on the IP-One Area inset policies map would be considered 'in town centre' sites defined through the NPPF as the primary shopping area. The shops or units within each of the three zones in the CSA are broken down into groups. The groups usually consist of a collection of buildings located in close proximity fronting the street or pavement, segregated by intersecting streets.
- 9.27.7 The previous Local Plan assessed individual frontages within each zone, which were monitored and updated annually. In practice, however, the application of applying the thresholds of each zone to individual frontages resulted in a policy that was unable to respond to the changing make-up and retail experience of these zones. There were instances where the policy restricted empty retail (~~formerly A1~~) units from being brought back into alternative uses due to concentrations of non-~~A1 retail~~ uses on a particular street frontage being too high. In addition, the frontage measurement approach often made it difficult to apply flexibility to given frontages, as some uses had frontage lengths that were disproportionate to the length of the street.
- 9.27.8 To respond to the above issues, the frontages have now been amalgamated to support a greater degree of flexibility in the CSA. The Primary Shopping Zone is formed of one

centralised area in the heart of the town. The Secondary Shopping Zones consist of Upper Westgate Street ('Sec4'); Lloyds Avenue ('Sec5'), Queen Street & Princes Street ('Sec3'); and Carr Street & Upper Brook Street ('Sec6'). The Specialist Shopping Zones are made up of the units to the south of the CSA in 'the Saints' and Fore Street ('Spec1'), and a small group at Providence Street ('Spec2'). These are demarcated on the map provided at Appendix 7.

- 9.27.9 In addition, the process for counting the percentages within each zone has been changed from a frontage measurement approach to a unit number approach to provide a more straightforward means of calculating the percentages. The zones will continue to be updated in the yearly Central Shopping Area Survey Report and this will form the basis of determining the proportion of units in a given area, unless more recent verified evidence is provided with applications.
- 9.27.10 In cases where applicants are proposing a change of use from ~~an A1 Class E use~~ to a non-A1Class E use that would fall above the defined thresholds, it is advised that they enter into pre-application discussions with the Council to determine the type of information that would be required to robustly demonstrate that it would add to the vitality and viability of the zone. In order to demonstrate that exceptional circumstances warrant the proposed non-A1Class E use, the following factors will be considered:
- The amount of time that the existing use has been vacant, including any information regarding the marketing of the unit;
  - The presence of other vacant A1 Class E units in the Shopping Zone, including any information regarding the marketing of these units;
  - The contribution that the proposed non-A1Class E use would make to the vitality and viability of the Shopping Zone and wider Central Shopping Area;
  - The active frontage of the proposed non-A1Class E use, taking into consideration the physical frontage, hours of use and type of use; and
  - The size of the unit.
- 9.27.11 The approach to land use within the CSA is to maintain a balance between A1 retail commercial, business and service uses and other appropriate uses, through the control of units within the zones. ~~The Town and Country Planning General Permitted Development Order 2015 introduced new permitted development rights for existing A1 units however the policy remains relevant due to size limitations contained within the new Order.~~ The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 amended the Town and Country Planning (Use Classes) Order 1987 and introduced changes to the system of 'use classes'. The result of this was to replace former Classes A (Retail), B1 (Business) and D1 (Non-Residential Institutions) with new use classes. This included the creation of 'Class E' (commercial, business and service), combining formerly separate retail (A1), financial and professional services (A2), food and drink (A3), business (office, research and development and light industrial process) (B1), non-residential institutions (medical or health services, creches, day nurseries and centres), and, assembly and leisure (indoor sport, recreation or fitness and gyms) into one use class. In addition, public houses and drinking establishments (formerly A4) and hot-food takeaways (formerly A5) are now 'sui generis'. Cinema, concert hall, bingo hall, dance hall and live music venues (formerly D2) are also now 'sui generis'. Uses in the CSA are monitored and updated annually.
- 9.27.12 In the Secondary and Specialist Shopping Zones, the previous percentages have been ~~retained~~ reduced in this plan ~~to reflect the amendments to the use classes order introduced.~~ but The policy now also refers to other main town centre uses being supported, in recognition of the need for centres to offer a range of attractions in order to maintain vitality and viability.
- 9.27.13 Protecting the visual character of listed buildings in the Central Shopping Area is covered elsewhere.

9.27.14 Mixed-use development will be supported in the Central Shopping Area only where a ground floor use in accordance with policy DM27 is provided. This reflects government policy to encourage diversification and mixed uses, and can help to create a vibrant centre including outside shopping hours. Main town centre uses as defined in the NPPF will only be permitted within the Central Shopping Area where specified criteria are met as set out in policy DM27.

~~9.27.15 Under a change to the Permitted Development Order that came into force on 30th May 2013, changes from a use falling within Classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments), Class A5 (hot food takeaways), B1 (business), D1 (non-residential institutions) and D2 (assembly and leisure) to another use within that same group of uses became, for a temporary period of up to two years, Permitted Development. Such changes are subject to Prior Notification of the local planning authority and exclude changes to floor areas in excess of 150 square metres and listed buildings. Monitoring indicates that there have been few such changes of use to date within the CSA.~~

9.27.15 The Council will seek funding opportunities to make environmental enhancements to the public realm of the centre and help it to remain competitive and attractive to users. The priority for improvements during the plan period will be the Cornhill, Tavern Street and Westgate Street. These enhancements should follow the key design principles set out in the Council's SPD "Ipswich Town Centre and Waterfront Public Realm Strategy" with a view to creating a dementia-friendly environment and a public realm fit for all. Where shops ~~fronts~~ are vacant and no longer providing an active frontage on the street, the Council will support opportunities to successfully use these frontages where they help to promote the vitality of the Town Centre. This could be through visual enhancements. Works to the shopfront which require advertisement consent and/or planning permission will need to also adhere to the principles of policies DM25 (shopfront) and DM26 (advertisements), as well as the Shopfront Design Guide SPD.

**POLICY DM30:  
District and Local Centres**

The Council will support the retention and provision of local shops and community facilities within defined District and Local Centres. The Centres are defined on the policies map and IP-One Area inset policies map.

Within the defined District and Local Centres:

a. proposals for the provision of additional shops or extensions to existing shops will be permitted provided they are of a scale appropriate to the centre. The requirements of the National Planning Policy Framework (NPPF) should be satisfied;

b. proposals for change of use from ~~A1 to A2-A5~~ Class E (commercial, business and services) to public houses, drinking establishments, takeaways, betting shops and payday loan shops and ~~D1 F1~~ uses and sui generis uses appropriate to a centre, including launderettes, will be permitted where they will not exceed ~~40%~~ 35% of the total identified ground floor frontage, provided the identified shopping frontage or the shopping character and range of shops is not unacceptably diminished. ~~No more than 20% of the total identified ground floor frontage will be permitted for A4 or A5 uses;~~

c. proposals for the change of use of ground floor units to community facilities will be permitted provided that:

i. satisfactory vehicular access and car parking can be provided;

ii. in the case of a vacant unit, the unit has suffered from a clearly demonstrated long-term vacancy for a period of at least 12 months. A marketing strategy for the unit must be agreed with the Local Planning Authority prior to its implementation and the agreed strategy implemented for a minimum period of 12 months prior to applying for planning permission for change of use or redevelopment. Any such application must be accompanied by an independent appraisal of the economic viability of the facility in its current use; and

iii. the physical treatment of the unit minimises the problem of dead frontages or is appropriate to the proposed use.

d. Residential uses will not be permitted on ground floor unless it has been clearly demonstrated the unit has suffered from long term vacancy for at least 12 months and none of the uses stated in paragraphs a, b and c are suitable, viable or deliverable.

Outside District Centres but within a 400m straight line distance of the centre the provision of community facilities will be permitted provided the facility:

e. is appropriate in scale and supports the needs of the adjacent residential area;

f. is accessible to all sectors of the community; and

**g. offers satisfactory vehicular access and car parking space in accordance with the Council's standards.**

**One new District Centre is proposed within the plan period at Sproughton Road. This centre will provide retail units and community facilities of a scale appropriate to serve its catchment area. Development of the Ipswich Garden Suburb in accordance with policy CS10 will require the provision of a new District Centre and two new local centres.**

- 9.30.1 District and Local Centres perform an important role serving, to varying degrees, the day-to-day convenience, food and services needs of their local resident catchment populations. Ipswich contains 11 existing District Centres and 34 Local Centres (with additional centres of both types proposed through the Core Strategy).
- 9.30.2 The District Centres are the more strongly performing centres and rely on a stronger convenience retail offer to underpin their function, vitality and viability. All the District Centres contain a supermarket. The District Centres also tend to be located on radial routes and benefit from some passing trade.
- 9.30.3 The Local Centres tend to contain fewer units than the District Centres and offer a more limited diversity of uses. However, they remain an important facility for meeting people's every day needs.
- 9.30.4 The approach to District and Local Centres is to strengthen their role and function and seek to retain shops and community facilities. Within the District and Local Centres, a balance between ~~A1 retail (shops)~~ Class E (commercial, business and services) and ~~non-A1~~ Class E uses (such as ~~food and drink establishments~~) will be maintained. ~~A2 to A5 uses~~ Public houses, drinking establishments, takeaways and other sui generis uses appropriate to a centre will also be supported, provided the overall percentage of the frontage does not exceed the levels specified in the policy. District centres are listed under policy CS2. The local centres are listed below (with reference numbers for cross reference to the policies map).

- Fircroft Road (1)
- Garrick Way (2)
- Dale Hall Lane/Dales Road(4)
- Ulster Avenue (5)
- Norwich Road (197-307a) (6)
- Dickens Road (8)
- Cambridge Drive (10)
- Maidenhall Green (12)
- Ellenbrook Green (14)
- Colchester Road (61-65) (15)
- Brunswick Road (16)
- Cauldwell Hall Road/Spring Road (19)
- Cauldwell Hall Road/St John's Road (20)
- Foxhall Road (25-97, 34-124) (21)
- Bixley Road/Foxhall Road (22)
- Selkirk Road (24)
- Clapgate Lane (207-221)/Landseer Road (325-327a) (25)
- Reynolds Road (26)
- Queen's Way (29)
- Felixstowe Road (474-486) (30)
- Penshurst Road (31)
- Cliff Lane (32)
- St Helen's Street (33)
- Bramford Lane (34)
- Bramford Road (35)

- Spring Road (36)
  - Albion Hill, Woodbridge Road (291-386) (37)
  - Lavender Hill (38)
  - Bramford Road (560 and 651-677) (40)
  - Bramford Lane (483-487) (42)
  - St Matthew's Street (44)
  - Woodbridge Road (28-110) (46)
- 9.30.5 The policy will help focus community development in the Local and District Centres. The community facilities are defined in Appendix 2.
- 9.30.6 Zonal maps for each District Centre to support community facilities within 400m straight-line distance are defined on Plan 1. Local Centres are also defined on Plan 1.
- 9.30.7 As an indication of appropriate scale the Council expects additional food stores in District and Local Centres should not exceed 1,500 sq. m. net. This is to ensure the development is of a scale appropriate to serve the centre and not the town as a whole, which could in effect divert retail away from the town centre. The applicant should also demonstrate that it can meet the requirements as set out in the NPPF, which covers the following points:
- a. that the development is of an appropriate scale;
  - b. that there are no more central sites for the development;
  - c. that there are no unacceptable impacts on existing centres; and
  - d. that locations are accessible.
- 9.30.8 The approach is to maintain a balance between ~~retail~~ Class E uses and non-~~retail~~ Class E uses, through the control of frontages. An analysis of the existing frontages in a sample of the District and Local Centres supports the ~~increase in the thresholds of 35% of non-Class E A2 to A5 uses, to 40%.~~
- ~~9.30.9 The introduction of use class categories A4 and A5 (drinking establishments and hot food takeaways previously use class A3) has been reflected in the policy. This will To assist in controlling the night-time economy. A proportion of 20% has been set, which is higher than the threshold set for the Central Shopping Area, but appropriate, as the District and Local Centres serve residential communities.~~
- 9.30.10 The policy allows change of use to take place from ~~retail~~ commercial, business and service uses to proposals for community uses where certain criteria apply. Residential uses will be encouraged on upper floors in the centres and in the vicinity of the centres to maximise access to shops and facilities. Accessible under clause f of policy DM30 relates to community facilities being accessible by a range of transport modes including for those without a car.
- 9.30.11 The boundaries of the District Centres are shown on the policies map and, within them, policy DM30 applies to development proposals. Developers of new properties will be expected to comply with policy DM28 and the Shopfront Design Guide SPD.



**POLICY DM31:**  
**Town Centre Uses Outside the Central Shopping Area**

**Within the Town Centre, which is defined on the IP-One Area inset policies map, but outside the Central Shopping Area, the development of non-retail town centre uses, including leisure, recreation, culture and tourism uses, will be permitted. This area must be considered before edge or out of centre locations for these town centre uses. ~~B1~~ Office uses and mixed use schemes including housing will also be encouraged in the town centre, however industrial uses (Use Class E (excluding offices), B2 or B8 ~~B-Class uses excluding offices~~) will not be permitted.**

- 9.31.3 The non-retail main town centre uses which are managed through this policy are predominantly focused away from the Central Shopping Area, with the exception of a small element permitted in the Secondary and Specialist Shopping Areas or as part of certain mixed use developments as described in policy DM27, in order to maintain A1 retail use as the predominant use in the Central Shopping Area. For the development of non-retail town centre uses outside the Town Centre, the NPPF shall apply.

**POLICY DM32:  
Retail Proposals Outside Defined Centres**

**Retail proposals in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable under the terms of the National Planning Policy Framework (NPPF), particularly in terms of:**

- a. the appropriate scale of development;**
- b. the sequential approach;**
- c. avoiding significant adverse impact on existing Defined Centres, including any cumulative impact; and**
- d. accessibility by a choice of means of transport.**

**Retail developments of more than 200sqm net outside defined centres will be required to undertake a retail impact assessment. Assessment of the retail impact of proposed development on the Central Shopping Area will only be required where the retail floorspace proposed exceeds 525 sq. m net.**

**The requirement for a sequential test does not apply to applications for small scale rural offices or other small scale rural development.**

9.32.5 This policy applies to retail proposals which are defined as those uses falling within ~~Use Classes A1 (Shops), A2 (Financial and Professional Services) and A5 (Hot Food Takeaways)~~ only. ~~Use Classes A3 (Restaurants and Cafes) and A4 (Drinking Establishments)~~ are classified as leisure within the NPPF definition of main town centre uses and therefore this policy does not apply to these uses. It is important to distinguish between these ~~uses~~ ~~classes~~ as it affects the application of the sequential test, as set out in the NPPF.

9.32.6 Policy DM32, and the requirement to undertake a sequential test, applies to all retail proposals, except small scale rural offices or other small scale rural development, as per Paragraph 89 of the NPPF (2019). The requirement for a Retail Impact Assessment will apply to all proposals which give rise to more than 200 sq.m net floorspace, either from a single unit or the aggregation of units within the proposed development. Retail proposals that are over 525 sq. m net will be required to ~~undertake~~ include the impact ~~an impact assessment~~ on all Defined Centres (including the Central Shopping Area) in the catchment area. Retail proposals that are over 200 sq. m net will be required to undertake an impact assessment on District and Local Centres in the catchment area. All impact assessments will need to consider the impact of the proposal on existing, committed and planned public and private investment in Defined Centres in the catchment area of the proposal, taking account of cumulative impact. The impact assessment should consider the impact of the proposal on the vitality and viability of Defined Centres.

**POLICY DM33:  
Protection of Employment Land**

The Employment Areas are defined on the policies map and the IP-One Area inset policies map and listed below:

1. Ipswich Business Park, north of Whitton Lane;
2. White House Industrial Estate, White House Road;
3. Knightsdale Road / Wharfedale Road;
4. Boss Hall Industrial Estate;
5. Hadleigh Road Industrial Estate, including Elton Park;
6. Land south of London Road / east of Scrivener Drive;
7. Civic Drive / Princes Street / Russell Road / Portman Road;
8. Felaw maltings / IP-City Centre;
9. Riverside Industrial Park and the West Bank area;
10. Cavendish Street;
11. Holywells Close and Holywells Road;
12. Cliff Quay/Sandy Hill Lane / Greenwich Business Park / Landseer Road area;
13. Wright Road / Cobham Road;
14. The Drift / Leslie Road / Nacton Road;
15. Ransomes Europark;
16. Airport Farm Kennels, south of Ravenswood; and
17. Futura Park, Nacton Road

The defined Employment Areas will be safeguarded for employment and ancillary uses. The Council may seek to safeguard employment uses and development falling within Use Class E(g) by way of planning conditions where there are specific circumstances to address a particular issue, for example to prevent retail uses in out of centre locations.

Employment uses are defined as:

- i. ~~B1 Business Use Class E(g) (formerly B1)~~, B2 General Industry or B8 Storage and Distribution, as defined by the Use Classes Order 1987 (as amended), with a town centre first approach to the location of offices; and
- ii. appropriate employment-generating sui generis uses.

Small scale services specifically provided for the benefit of businesses based, or workers employed, within the Employment Area will also be permitted where:

- a. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; and
- b. the proposed use is compatible with the surrounding uses.

Outside the defined Employment Areas, the conversion, change of use or redevelopment of sites and premises in employment use to non-employment uses will only be permitted where:

- c. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; or

**d. the proposed use is residential and it can be acceptably accommodated, would make more effective use of the site and would not harm the economic development strategy of the plan; and**

**e. in relation to c. and d., the proposed use is compatible with the surrounding uses and is an appropriate use for the site.**

- 9.33.1 The established Employment Areas across the Borough represent very significant clusters of employers providing jobs and therefore need to be safeguarded. The jobs growth target set out in policy CS13 means that protecting against the loss of employment areas is important. Conditions may be applied to permissions to safeguard employment uses in use class E(g) in protected employment areas where alternative use class E uses may be appropriate. For example where retail in an out-of-centre location could take place that could harm the vitality and viability of existing centres. Protecting employment areas for employment use also retains choice of locations across the Borough for businesses to locate in. As consolidated employment areas, operational requirements such as 24 hour working or heavy goods access are also more likely to be capable of being met without adversely affecting the amenity of residential areas. Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.
- 9.33.3 Retail uses will not be permitted other than as small scale retailing ancillary to the main ~~B-class employment~~ use. Ancillary uses are defined in terms of size of floorspace and there being a functional relationship with the main B class use. Ancillary retailing should be less than 10% of the floorspace or 200 sq. m net, whichever is the smaller.
- 9.33.4 To demonstrate no reasonable prospect of re-use for employment purposes over the plan period in accordance with the policy, applicants will be required to produce evidence that the site has been marketed actively for a continuous period of at least twelve months from the date of the first advertisement for employment uses as appropriate to the site. Further information on the marketing requirement are set out in appendix 6. In addition, in determining whether there is no reasonable prospect, the Council will take into account factors such as: the length of time since the site was allocated in the development plan; the planning history of the site, including any planning application or pre-application enquiries; and whether there are any changes of circumstance that mean that take-up of the site for its intended use is now likely.
- 9.33.7 References to employment uses in this policy and reasoned justification exclude retail uses. Appropriate employment-generating sui generis uses referred to in the policy include uses such as car showrooms with accompanying workshops and waste facilities and excludes any sui generis use which includes retail or leisure as anything other than an ancillary use. Small scale services could include small gyms or cafes (use classes ~~D2 or A3~~ E) providing facilities targeted at people working in the area. All uses, whether temporary or permanent, will be expected to provide appropriate facilities on the site for employees.

## Appendix 11 – Policy SP2 Modifications – Response to Q2

### Policy SP2 Land Allocated for Housing

- 4.5 Through ~~Final Draft~~ Core Strategy policy CS7 ‘The Amount of Housing Required’, the Council commits to allocating land to provide at least an additional 6,100 dwellings net to 2036. The following policy provides the detailed site allocations to deliver a proportion of that housing requirement.

#### Policy SP2 Land allocated for housing

The following sites are allocated for residential development, or part residential development within mixed use developments as indicated in Table 1. Development will take into account appropriately the constraints identified through the site sheets contained in Appendix 3 of the plan.

**Table 1 Land allocated for residential use or residential-led mixed use**

Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
IP004	Bus depot, Sir Alf Ramsey Way Allocated for mixed residential & <del>B1</del> office use; historic depot to be retained and converted as part of <u>office B1</u> .	1.07 (c. 50%)	48	90dph (DM23a lower end of range)	L
IP132	Former St Peters Warehouse Site, 4 Bridge Street	0.18ha	73	73 dwellings as part of a mixed use scheme (with <del>B1a</del> office use, leisure or small scale retail)	M
IP150e	Land south of Ravenswood	3.6	126	DM23 c. low density as	M

Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
	(excluding area fronting Nacton Road) – to be master planned			part of mixed use with <del>B1</del> <u>E(g) uses (excluding offices)</u>	

## Appendix 12 – Policy SP4 Modifications – Response to Q2

### Policy SP4 Opportunity Sites

#### Policy SP4 Opportunity Sites

Four opportunity sites have been identified within IP-One that have potential for housing-led redevelopment and would contribute to the regeneration of the Waterfront and Town Centre. These are listed below and described in Appendix 4. The Council will work with land owners and other interested parties to investigate opportunities and bring them forward through the development management process, taking into account constraints set out in the Appendix 4 site sheets.

##### **IP028b Jewsons, Greyfriars Road**

Potential mix: residential, leisure (~~A3-A5~~ restaurants and cafes, drinking establishments, hot food takeaways and/or indoor sport, recreation or fitness/~~D2~~), office

Indicative capacity: 40 dwellings

Regeneration role: a site with potential for a more efficient and appropriate town centre use than the current builders' yard, which would continue the regeneration of Greyfriars Road achieved through the residential redevelopment adjacent at Wolsey Street and improve pedestrian routes from Cardinal Park to the Central Shopping Area by reducing 'dead' frontage.

##### **IP045 Land bounded by Toller Road, Cliff Lane and Holywells Road**

Potential mix: residential and employment (Use Class E(g)), community, arts, open space or tourism

Indicative capacity: 148 dwellings

Regeneration role: a key site for the regeneration of the eastern quays, lying between IP226 to the west (see below) and residential allocation IP064 to the east. The site would provide opportunities to improve pedestrian linkage from the eastern quays to open space at Holywells Park.

##### **IP052 Land at Star Lane/Lower Orwell Street**

Potential mix: residential, employment, leisure

Indicative capacity: 29 dwellings

Regeneration role: an important site for the regeneration of Lower Orwell Street and improvements for pedestrians and cyclists on Star Lane, with residential and mixed-use allocations across Lower Orwell Street at IP011a and IP011b.

##### **IP226 Helena Road/Patteson Road**

Potential mix: residential and uses appropriate at the Waterfront (policy SP11)

Indicative capacity: 337 dwellings

Regeneration role: a key site for the regeneration of the eastern quays providing a bookend to the Waterfront development and linking through to the brewery site IP042 to the south, with residential allocation IP098 adjacent.

## Appendix 13 – Policy SP5 Modifications – Response to Q1 & Q2

### Policy SP5 Land Allocated for Employment Use

- 4.23 Final Draft Core Strategy policy CS13 refers to the allocation of at least 23.2ha of employment land across the Borough to deliver jobs growth. The following policy addresses this requirement.

#### Policy SP5 Land allocated for employment use

The following sites are allocated for employment development within Use Classes E(g)~~B1~~, B2 or B8, either in their entirety or as part of mixed use developments as specified in Table 3. Appropriate employment-generating sui generis uses, defined through policy DM33, will also be permitted where specified.

**Table 3 Land allocated for employment uses**

Site	Address	Site Area ha	Notes
IP029	Land at Bramford Road	2.26ha (45%) = 1ha	Suitable for employment uses <del>B1(c)</del> <u>E(g)(iii)</u> , B2 and B8 and appropriate employment-generating sui generis uses as defined through policy DM33.
IP067 b	Former British Energy Site	4.18	Suitable for <del>B1 (excluding office use B1a)</del> <u>E(g) (excluding office use)</u> or B8 and appropriate employment-generating sui generis uses as defined through policy DM33 – residential use is proposed on the northern section and therefore uses should be compatible with residential
IP094	Land to rear of Grafton House	0.31	Suitable for <del>B1a</del> office <u>E(g)(i)</u>
IP140	Land north of Whitton Lane	6.93	Suitable for <del>B1</del> <u>E(g)</u> , B2 and B8 and appropriate employment-generating sui generis uses as defined through policy DM33.



Site	Address	Site Area ha	Notes
			Delivery expected in the medium to long term. Should be planned comprehensively as part of a larger scheme with adjacent land in Mid Suffolk but the two areas could come forward in phases. Subject to suitable access being provided.
IP141 a	Land at Futura Park, Nacton Road	4.78	Suitable for <del>employment uses B1b, B1c</del> , <u>E(g) (excluding office use)</u> , B2, B8 and appropriate sui generis uses as defined through policy DM33.
IP150 c	Land south of Ravenswood	1.18	Suitable for <del>B1 (excluding office use B1a)</del> , <u>E(g) (excluding office use)</u> , and appropriate employment-generating sui generis uses as defined through policy DM33
IP152	Airport Farm Kennels	7.37	A site for longer term development subject to access improvements. Suitable for <del>B1 (excluding office use B1a)</del> , <u>E(g) (excluding office use)</u> , B2 or B8 and appropriate employment-generating sui generis uses as defined through policy DM33. Development will be subject to the preparation of a development brief to address matters including the nationally designated Area of Outstanding Natural Beauty. The Council will explore the feasibility of park and ride being incorporated into this site.
IP004	Bus depot Sir Alf Ramsey Way	1.07 (50%) = 0.53	50% <del>employment offices</del> <u>E(g)(i)</u> as part of mixed use scheme with housing

Site	Address	Site Area ha	Notes
IP043	Commercial Buildings & Jewish Burial Ground Star Lane	0.70 (20%) = 0.14	Suitable for <del>B1</del> office (E(g)(i)) and R&D (E(g)(ii)) / leisure as within the town centre boundary, as part of a mixed use development with housing
IP051	Old Cattle Market Portman Road	2.21 (80%) = 1.77	Prime town centre site for new <del>B1a</del> office (E(g)(i)) development 80% <del>B1a</del> office and 20% main town centre uses such as hotel / leisure (excluding retail). Numerically like for like replacement of existing long-stay car parking provision in this area will be required prior to the parking being lost. Offices with large floor plates in an office campus design approach are likely to be developed.
IP119	Land east of West End Road	0.61ha (15%) = 0.1ha	Suitable for employment uses <del>B1(c), E(g), B2 and B8 and appropriate employment-generating sui generis uses as defined through policy DM33.</del>
IP132	Former St Peters Warehouse Site, 4 Bridge Street	0.18ha / 0.05ha	<del>B1a</del> Office (E(g)(i)), leisure, small scale retail as part of a mixed use scheme of 73 dwellings
	<b>TOTAL</b>	<b>28.34.ha</b>	

4.23 ~~Final Draft~~ Core Strategy ~~Policy CS13~~ sets a target of approximately 9,500 jobs to be provided 2018-2036 through a number of measures, including the allocation of at least 23.2ha of land for employment development. In the interest of ensuring a range and choice of sites across the Borough and the plan period, this policy allocates land for employment equivalent to 28.34ha. A higher quantum of employment land than the minimum requirement is also necessary to ensure sufficient land is available to meet demand arising from the town's sub-regional economic role, as reflected in the Suffolk Growth Framework and NALP Economic Strategy for Norfolk and Suffolk.

4.26 The sites allocated are reserved for Class ~~B~~ uses E(g), B2 and B8 uses as identified in the Use Classes Order 1987 (as amended and updated), other than where a mix of uses or appropriate employment-generating sui generis uses are specified in Table 3 above. On those sites allocated for a mix of uses including employment, the proportions indicated in the policy represent the Council's preferred outcome and form the basis of supply calculations. However, the figures are indicative other than in the case of open space requirements and community facilities, to help ensure that developments can be viably delivered. Appropriate employment-generating sui generis uses are defined through policy DM33 and will need to

comply with other plan policies including DM18. Appendix 3 provides additional information about the sites allocated through this policy.

## Appendix 14 – Policy SP6 Modification – Response to Q11

### **Policy SP6 Land Allocated and Protected as Open Space**

#### **Policy SP6 Land allocated and protected as open space**

Existing open spaces are defined on the policies map. Within the defined open spaces, Core Strategy Review policy DM5 shall apply.

Site IP083 The banks of the River Orwell upriver from Princes Street is allocated for public open space. Any development proposals (groundworks) related to the deliver of the open space shall retain the river path and its setting.

Development of the following sites shall include more than the minimum amount of on-site public open space provision required through policy DM6, as specified in Table 4 below:

## Appendix 15 – Policy SP10 Modifications – Response to Q5

### Policy SP10 Retail Site Allocations

#### Policy SP10 Retail Site Allocations

Sites are allocated in the Central Shopping Area for retail development to meet the forecast need for comparison shopping floorspace to 2031 at:

- a. New site – IP347 Mecca Bingo, Lloyds Avenue (650 sq m net);
- b. IP040 The former Civic Centre, Civic Drive ('Westgate') as part of a residential-led development (2,050 sq m net);
- c. IP048b west part of Mint Quarter as part of a mixed use residential development (4,800 sq m net); and
- d. Units in upper Princes Street (675 sq m net).

The former British Homes Stores, Butter Market, is safeguarded to include some future ~~A1~~ retail provision.

The Central Shopping Area is amended to extend to the south-west part way down Princes Street and contract at its western extend to exclude the former police station (site IP041) and adjacent housing.

Land is also allocated at the former Co-Op Depot, Boss Hall Road (315 sq m net), to meet the need for comparison shopping floorspace as part of the new Sproughton Road District Centre. Development will be at an appropriate scale for a district centre in accordance with CS14.

The allocations and the extent of the Central Shopping Area are illustrated on the policies map and the IP-One Area Inset policies map.

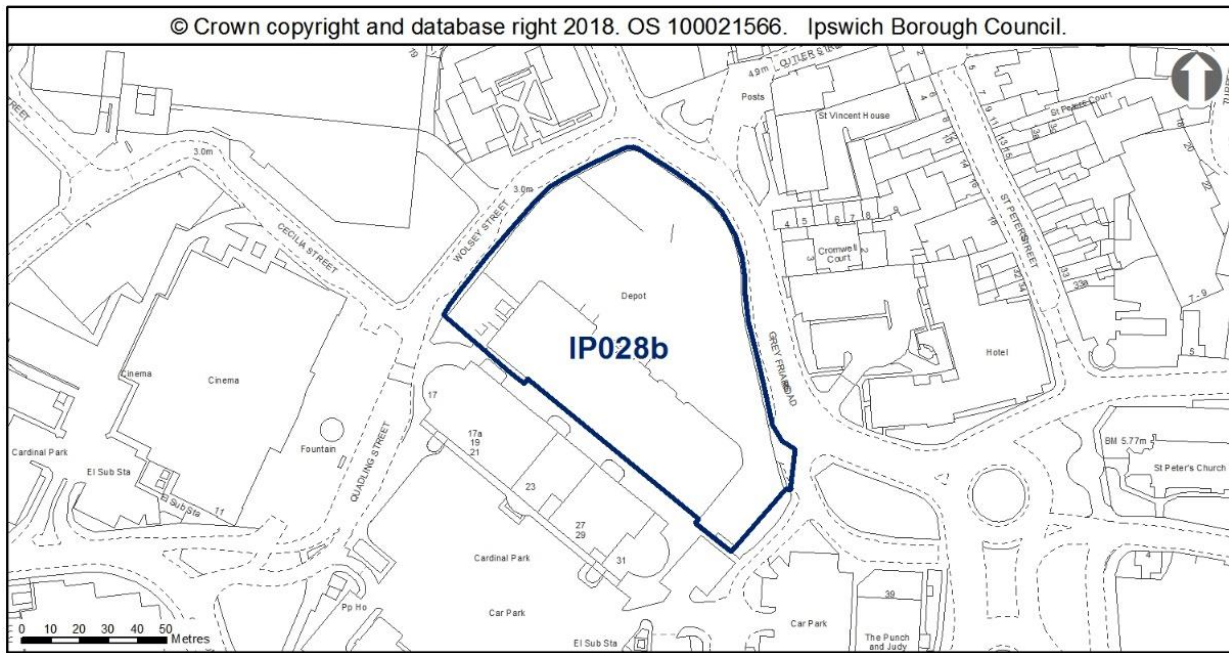
- 5.15 In addition to the new allocations, existing units which are vacant or in ~~A2~~ financial/professional services use are allocated and safeguarded, consisting of the upper part of Princes Street currently primarily in ~~A2~~ financial/professional services use but with two vacant units, and the former BHS store on the Butter Market which has potential for over 3,000 sq m of floor space in a large floorplate building in the primary shopping area.

## Appendix 16 – Appendix 4 (Opportunity Sites) Modifications – Response to Q2

### Appendix 4 – Opportunity Areas Sites

Site ref: IP028b Jewsons, Greyfriars Road

Site Area: 0.90ha



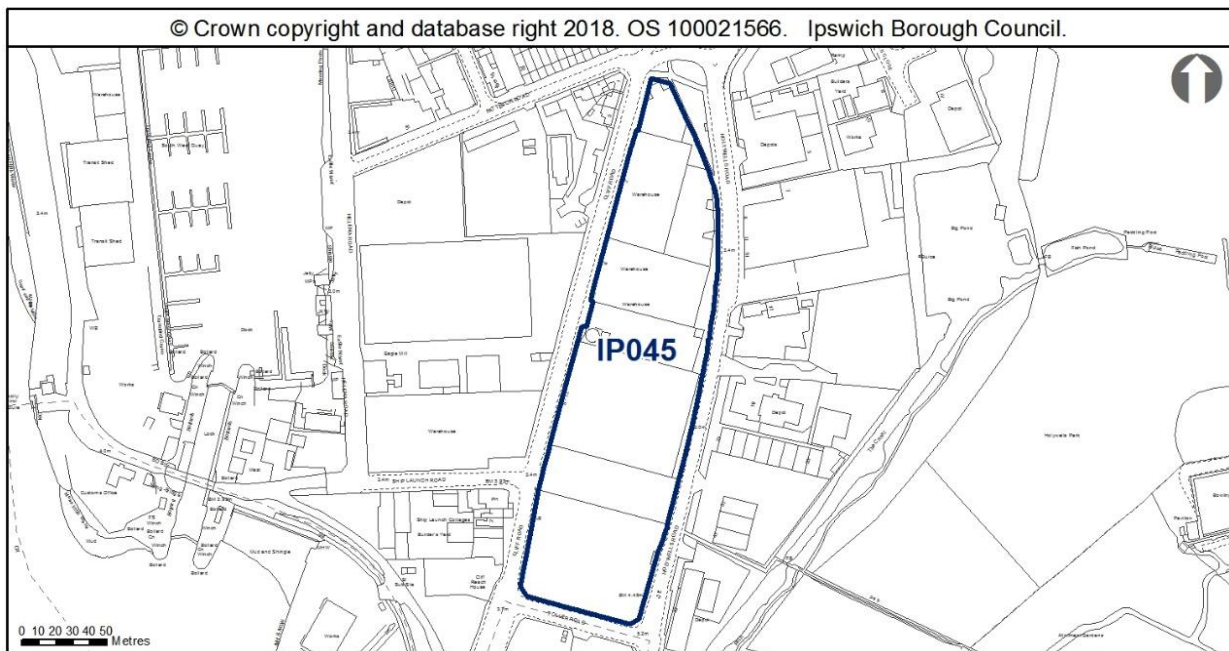
### Allocation Policy SP4

Use(s)		Indicative capacity
Primary	Residential	40 (90dph on 50% of the site)
Secondary	<p>Leisure (A3/A5, D2) (<u>restaurants and cafes, drinking establishments, hot food takeaways and/or indoor sport, recreation or fitness</u>)</p> <p>Office (<del>B1a</del>)</p>	4,000sqm

\* see Core Strategy policy DM23 for minimum and average densities.

**Site ref: IP045 Land bounded by Cliff Road, Toller Road and Holywells Road**

**Site area: 2.06ha**



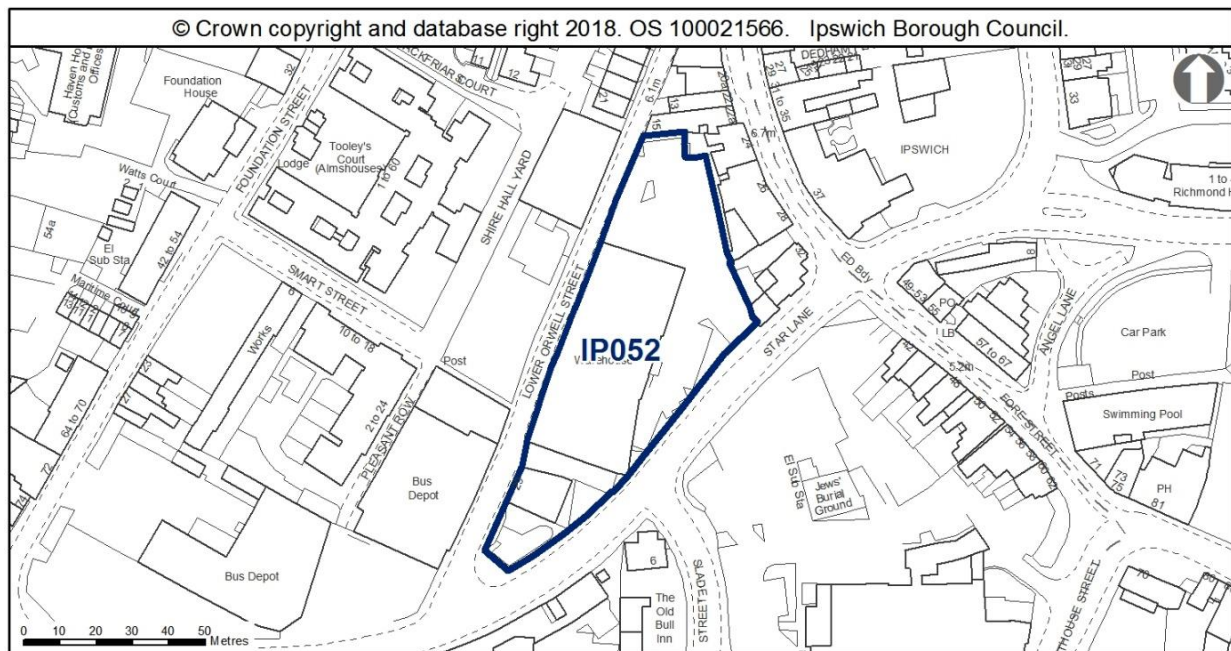
#### **Allocation Policy SP4**

Use(s)		Indicative capacity
Primary	Residential	148 (90dph on 80% of site*)
Secondary	Employment ( <del>B1a uses such as offices</del> ) ( <u>E(g)</u> )  Community, Arts, Culture, Open Space, Tourism	2,500sqm

\* see Core Strategy policy DM23 for minimum and average densities.

**Site ref: IP052 (UC055) Land between Lower Orwell Street & Star Lane**

**Site area: 0.40ha**



#### **Allocation Policy SP4 & SP5**

Use(s)		Indicative capacity
Primary	Residential	29 (90dph on 80% of site*)
Secondary	Employment (E(g))	1,000sqm

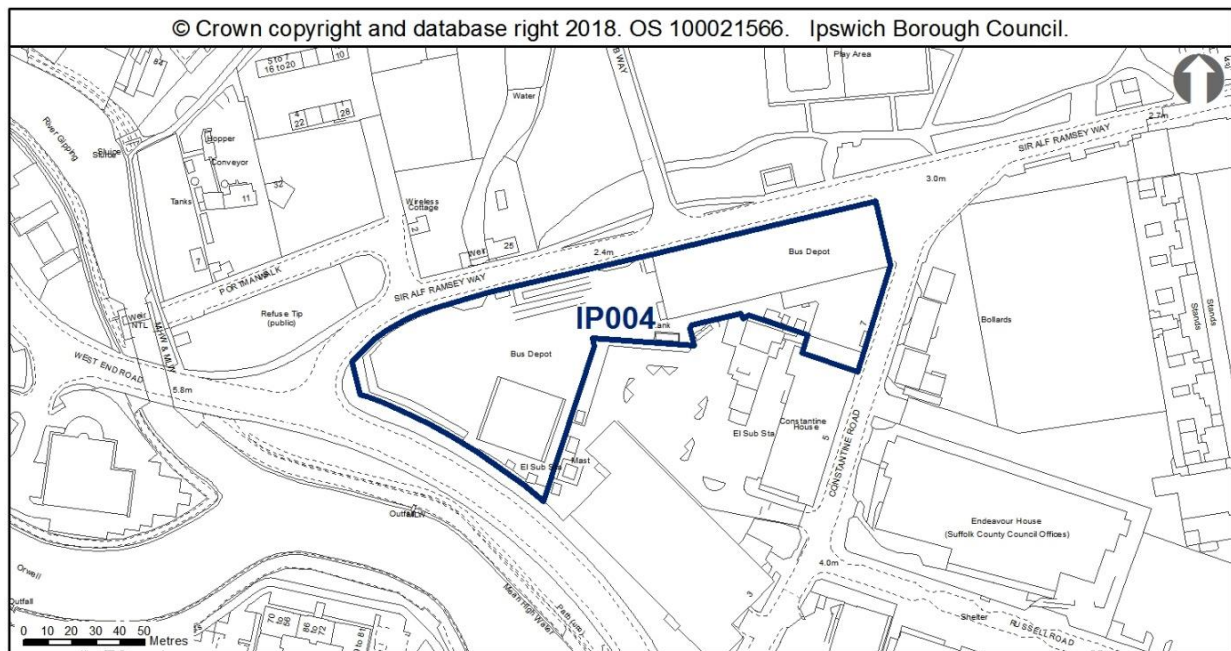
\* see Core Strategy policy DM23 for minimum and average densities.





## Site ref: IP004 (UC004) Bus Depot, Sir Alf Ramsey Way

Site area: 1.07ha



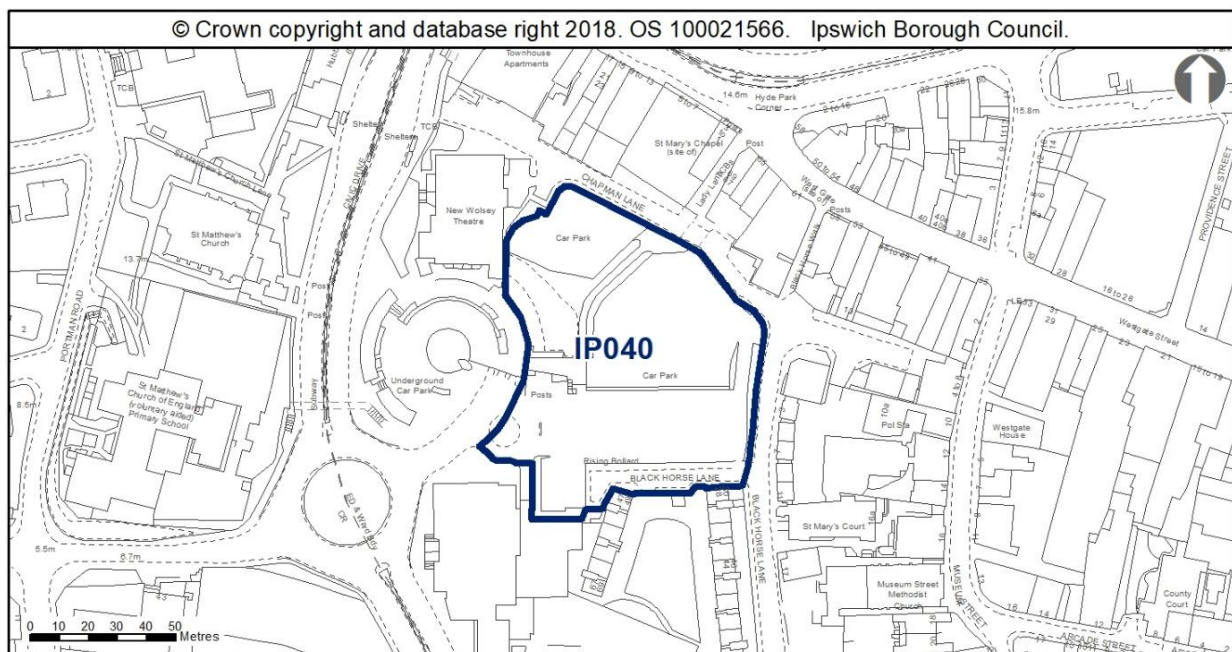
### Allocation Policies SP2 & SP5

Use(s)		Indicative capacity
Primary	Residential	48 (90dph on 50% of site*)
	Offices <del>(B1a)</del> <u>(E(g)(i))</u>	5,000sqm

\* see Core Strategy policy DM23 for minimum and average densities

**Site ref: IP040 (UC041) Former Civic Centre, Civic Drive (Westgate)**

**Site area: 0.73ha**



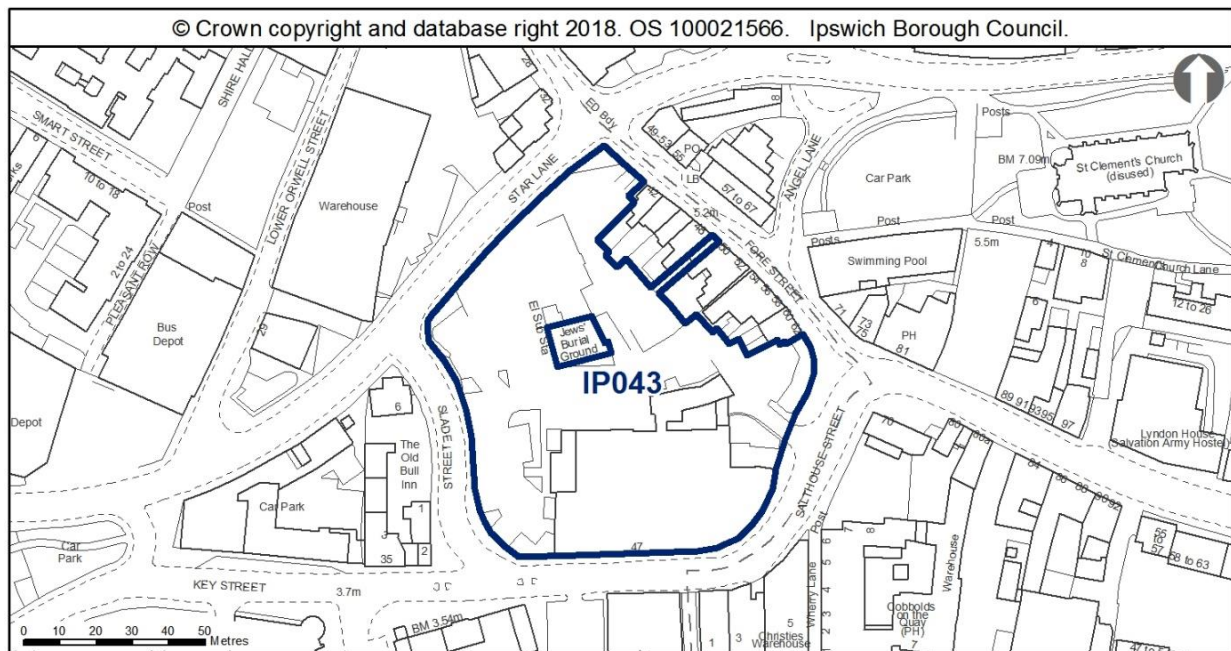
#### **Allocation Policies SP2 & SP10 – IP040**

<b>Use(s)</b>		<b>Indicative capacity</b>
Primary	Residential	59 (90dph on 90% of site)
Secondary	Retail <del>A1</del> Restaurant <del>(A3)</del> and Theatre-related uses	2,050 sq m (10%)

\* see Core Strategy policy DM23 for minimum and average densities.

Site ref: IP043 (UC044) Commercial Buildings, Star Lane

Site area: 0.70ha



#### Allocation Policies SP2 & SP5

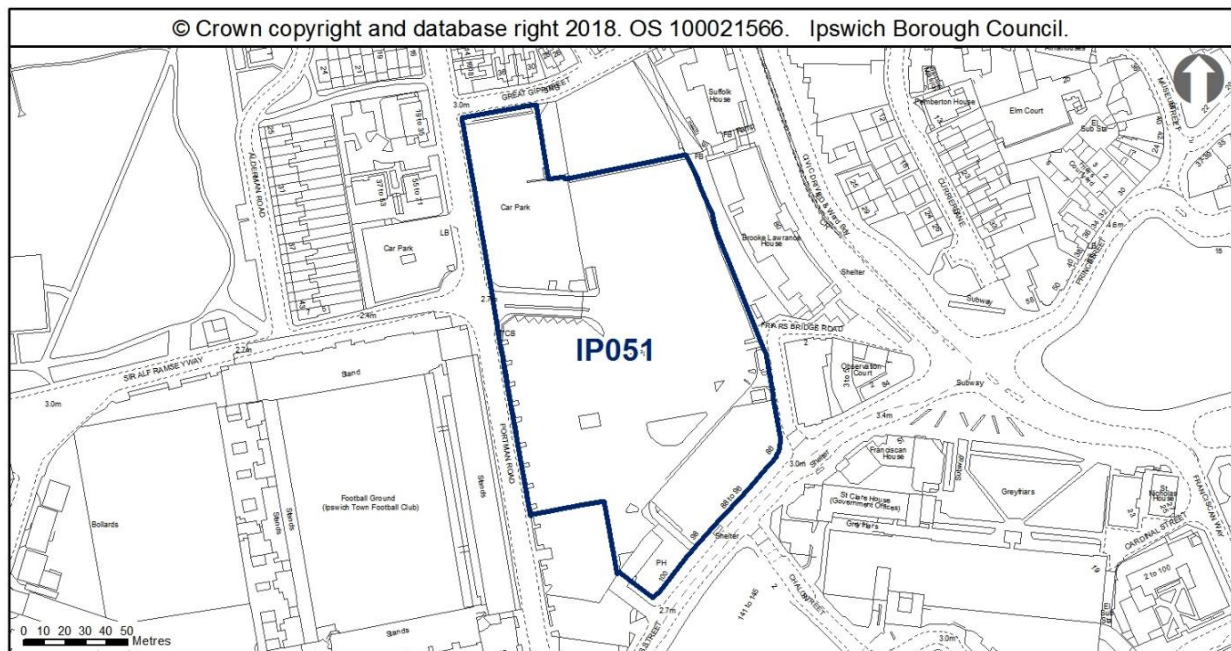
Use(s)		Indicative capacity
Primary	Residential	50 (90dph on 80% of site*)
Secondary	Employment ( <del>B1</del> <u>uses such as Office (E(g)i) and R&amp;D (E(g)ii)</u> )	1,000sqm

\* see Core Strategy policy DM23 for minimum and average densities.



Site ref: IP051 (UC054) Old Cattle Market, Portman Road - South

Site area: 2.21ha

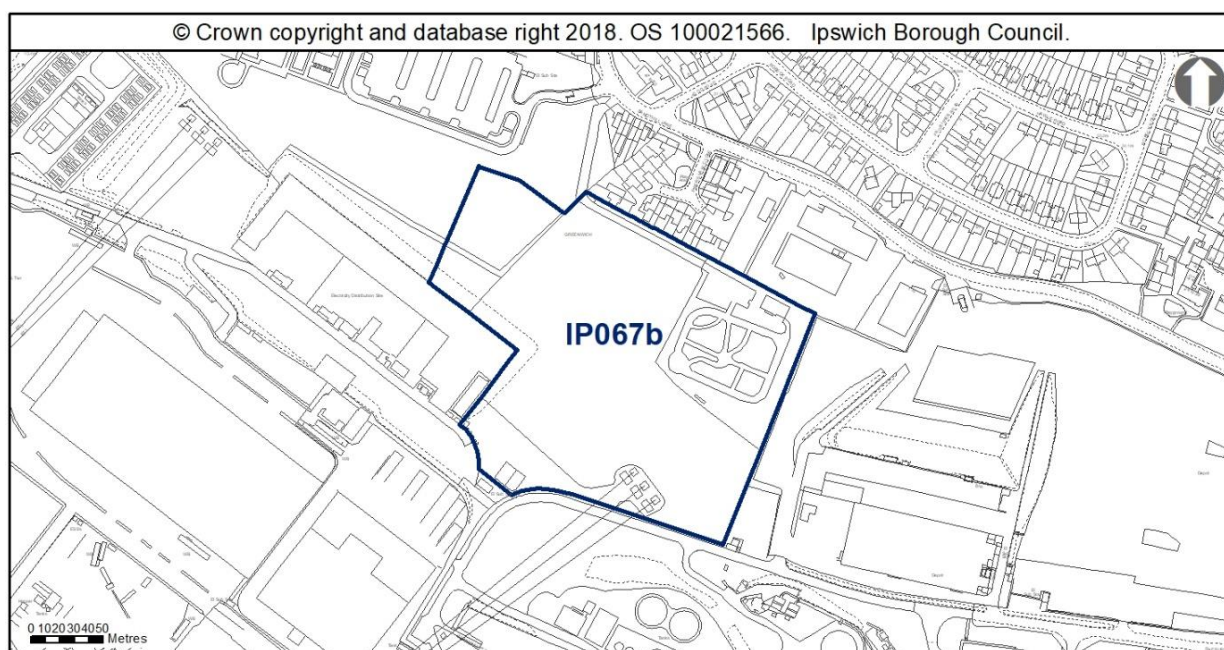
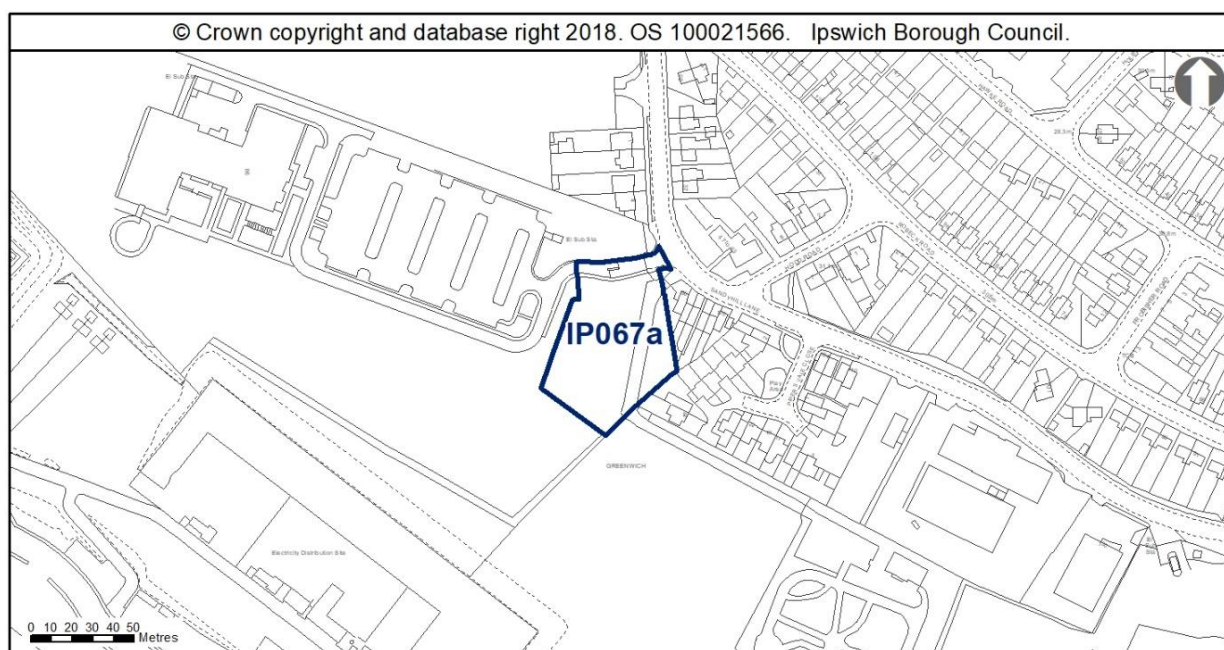


#### Allocation Policy SP5 & SP17

Use(s)		Indicative capacity
Primary	Offices <del>(B1a)</del> <u>(E)(g)(i))</u>	20,000sqm
Secondary	Hotel / Leisure (and possible long stay car parking)	-

**Site ref: IP067a & b (UC070) Former British Energy Site, Cliff Quay**

**Site area: 0.38ha Residential, 4.18ha Industrial**



**Allocation Policy SP2 & SP5**

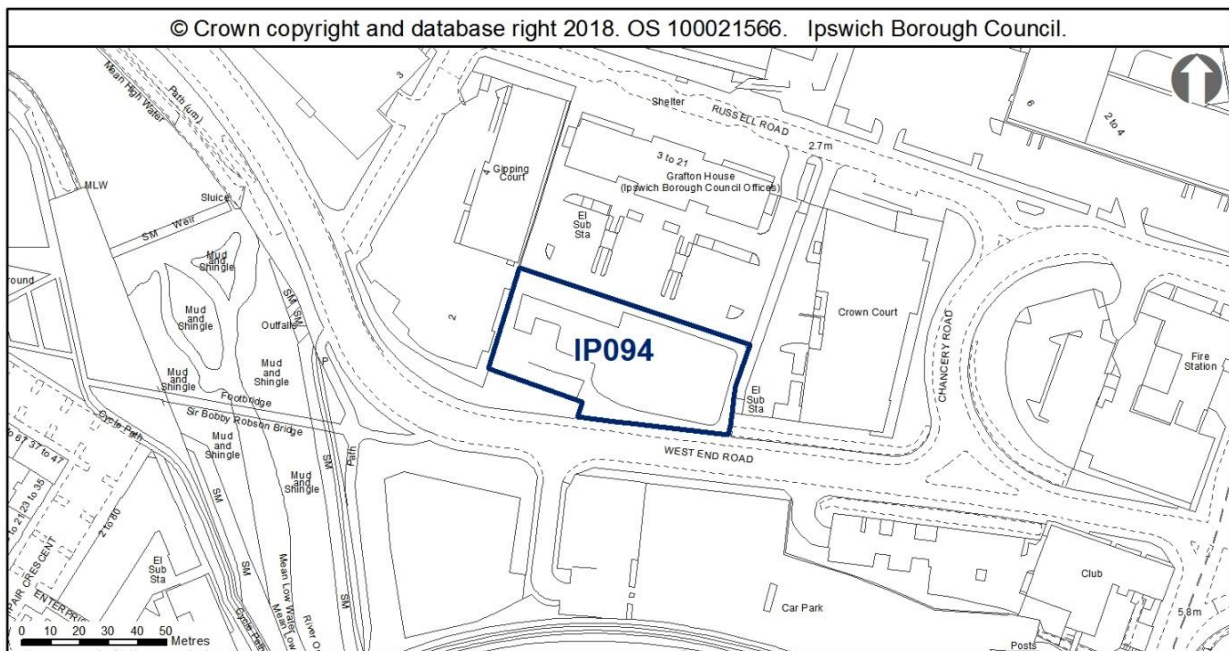
	Use(s)	Indicative capacity
Primary IP067b	Industrial (E(g)(iii), <u>B2 and B8</u> Class) and appropriate employment-generating sui	20,000sqm

	generis uses as defined through policy DM33	
Secondary IP067a	Residential	17 (45dph)

\* see Core Strategy policy DM23 for minimum and average densities.

Site ref: IP094 (UC104) Land to rear of Grafton House

Site area: 0.31ha



#### Allocation Policy SP5

Use(s)	Indicative capacity
B1a (office) (E(g)(i))	3,000sqm



**Site area: 0.61ha**

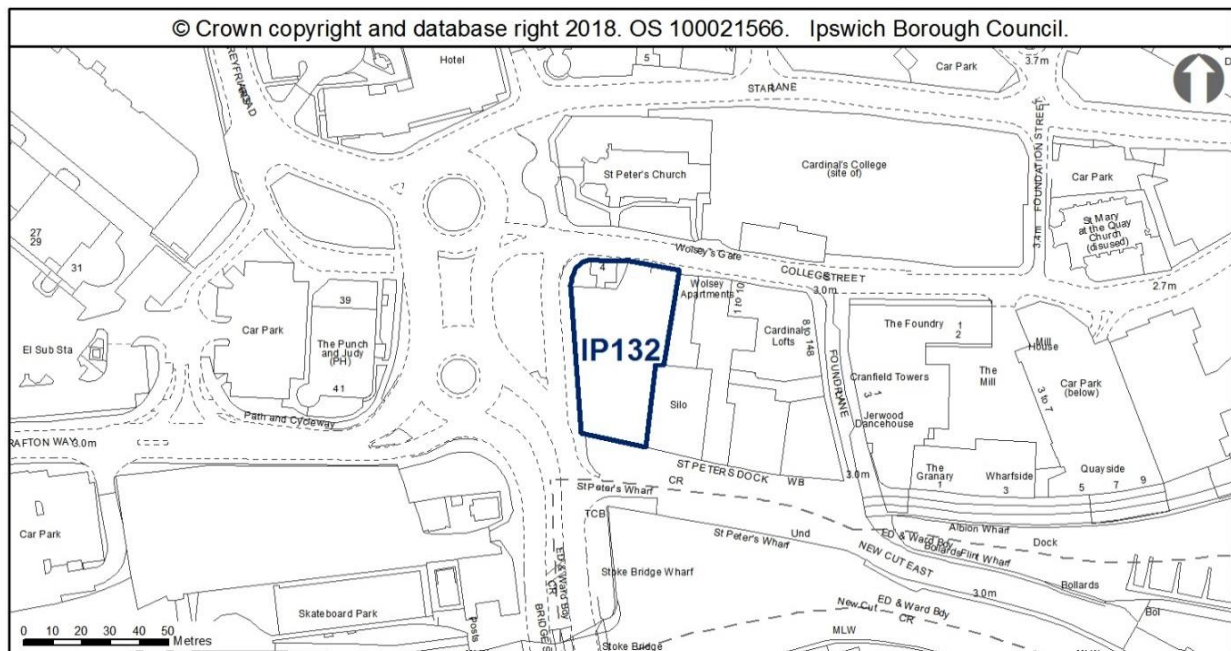


Use(s)		Indicative capacity
Primary	Residential	28 (100dph on 45% of site)
Secondary	Leisure	40% of site
	Employment <u>(E(g))</u>	15% of site

\* see Core Strategy policy DM23 for minimum and average densities.

Site ref: IP132 Former St Peter's Warehouse, 4 Bridge Street

Site area: 0.18ha



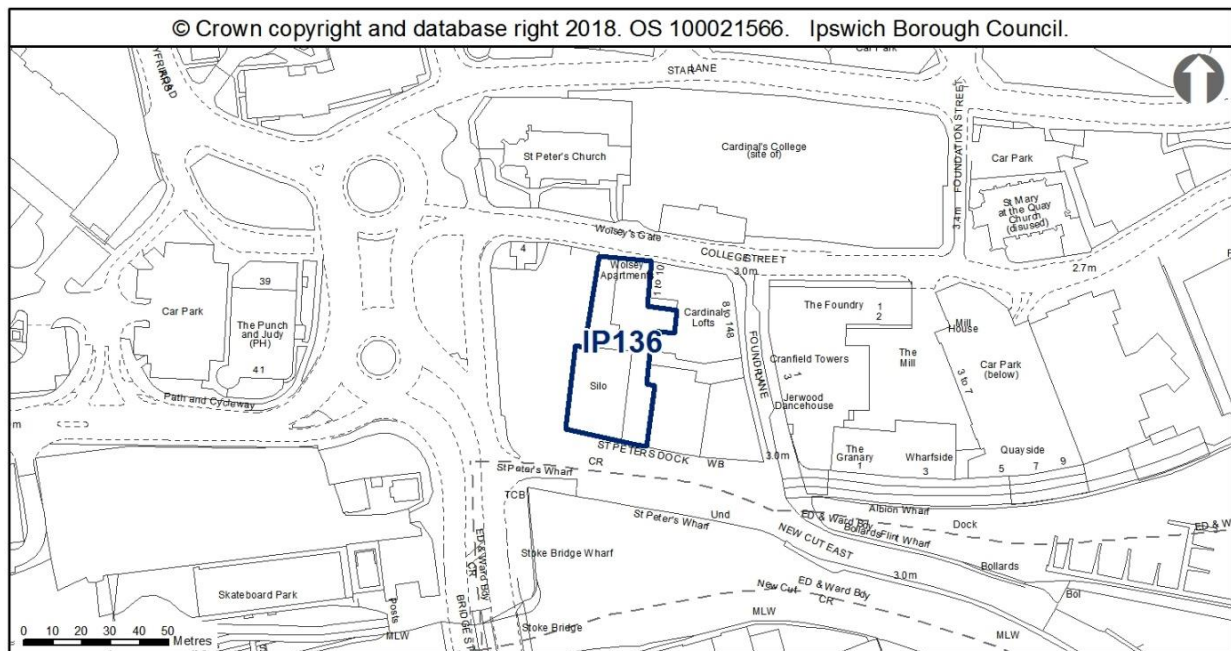
## Allocation Policy SP2

Use(s)		Indicative capacity
Primary	Residential	73 (high end of high density range expected)
Secondary	Offices (B1a) (E)(g)(i) Leisure / Retail (small scale)	Subject to layout of site - assume commercial uses on 2 lower floors

\* see Core Strategy policy DM23 for minimum and average densities.

Site ref: IP136 (UC251) Silo, College Street

Site area: 0.16ha

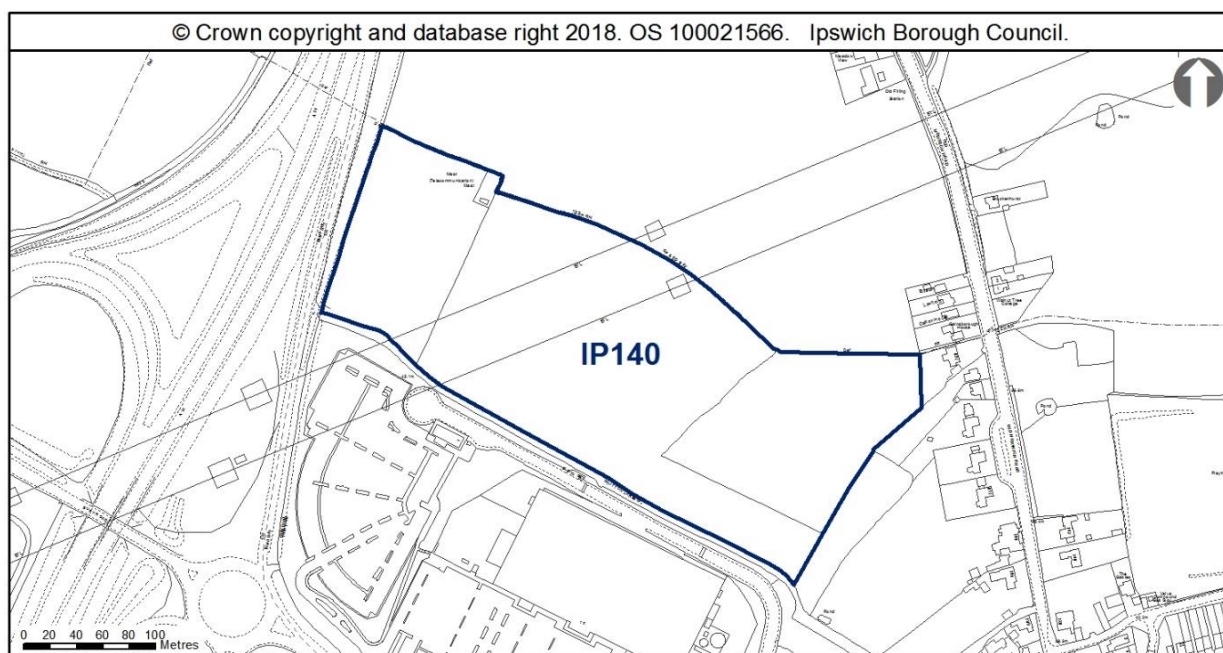


#### Allocation Policy SP2

Use(s)		Indicative capacity
Primary	Residential	48 (assumed 10 storey building with c. 6 flats per floor and commercial on lower two floors)
Secondary	Offices <del>(B1a)</del> (E(g)(i))/ Leisure / Retail (small scale)	Scale of office and leisure accommodation subject to layout of site Some individual retail units up to 200sqm – subject to Core Strategy policy DM32

Site ref: IP140 (UC257) Land North of Whitton Lane

Site area: 6.93ha



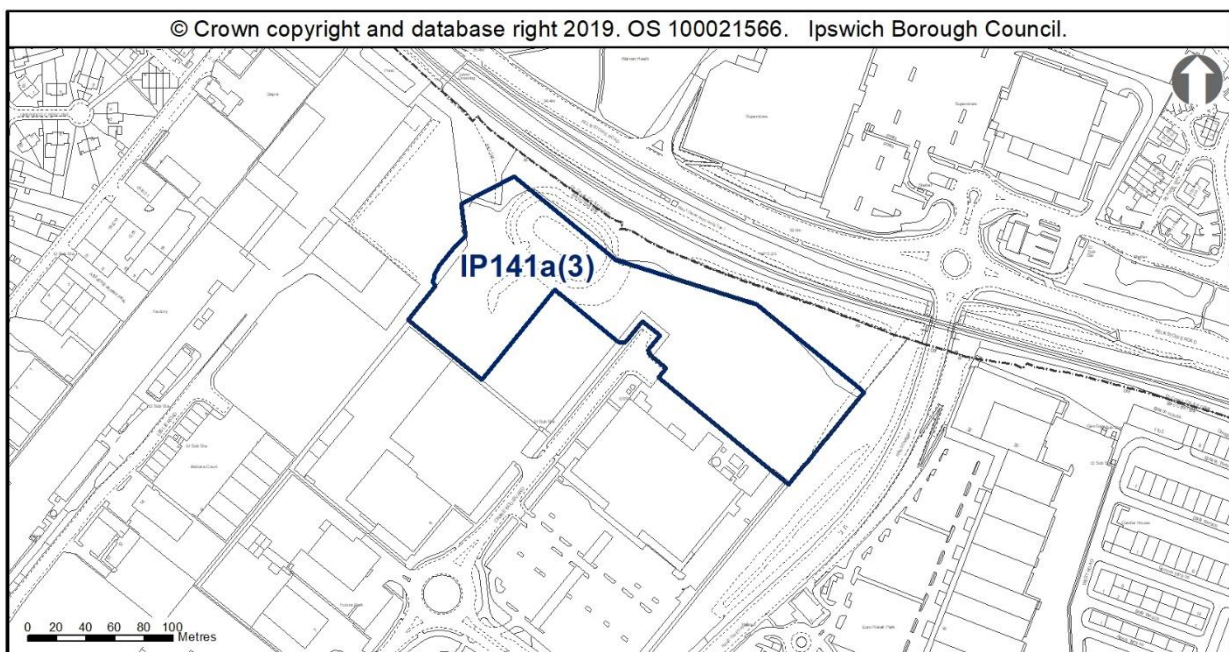
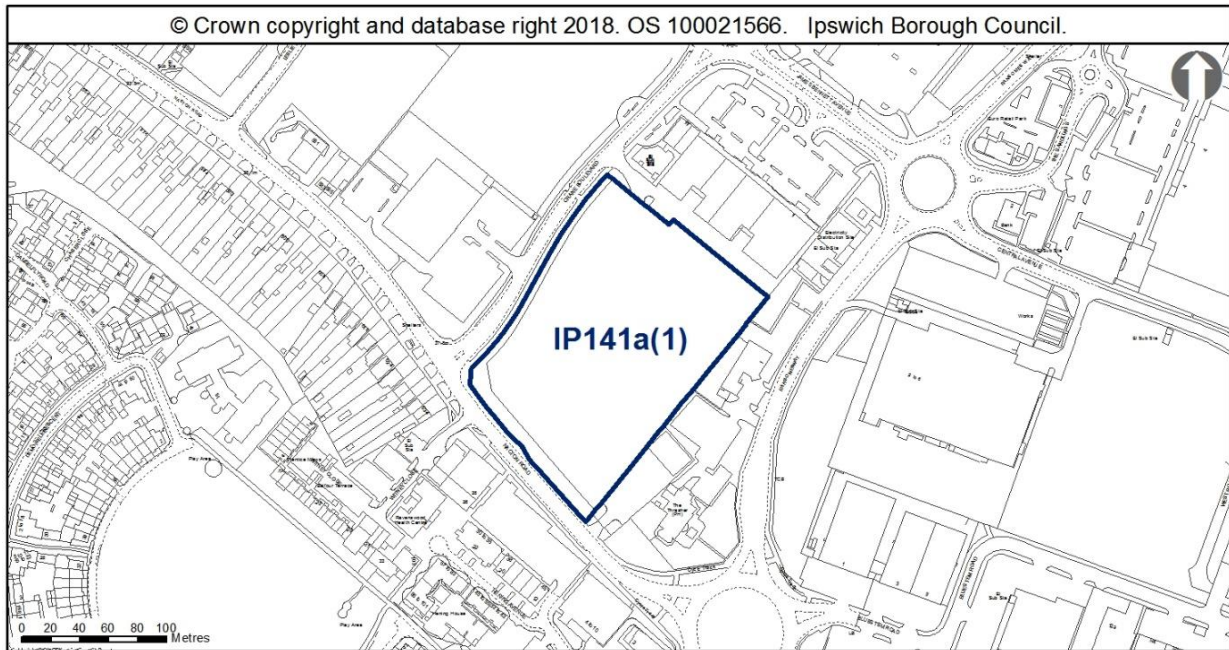
#### Allocation Policy SP5

Use(s)		Indicative capacity
Primary	Employment Park	
	Business ( <del>B1</del> including offices <del>B1a</del> <u>E(g)</u> )	10,000 sq m
	Other B class and appropriate employment-generating sui generis uses as defined through policy DM33	10,000 sq m



**Site ref: IP141a (UC258) Land at Futura Park, Nacton Road (formerly the Cranes Site)**

**Site area: 4.78ha**



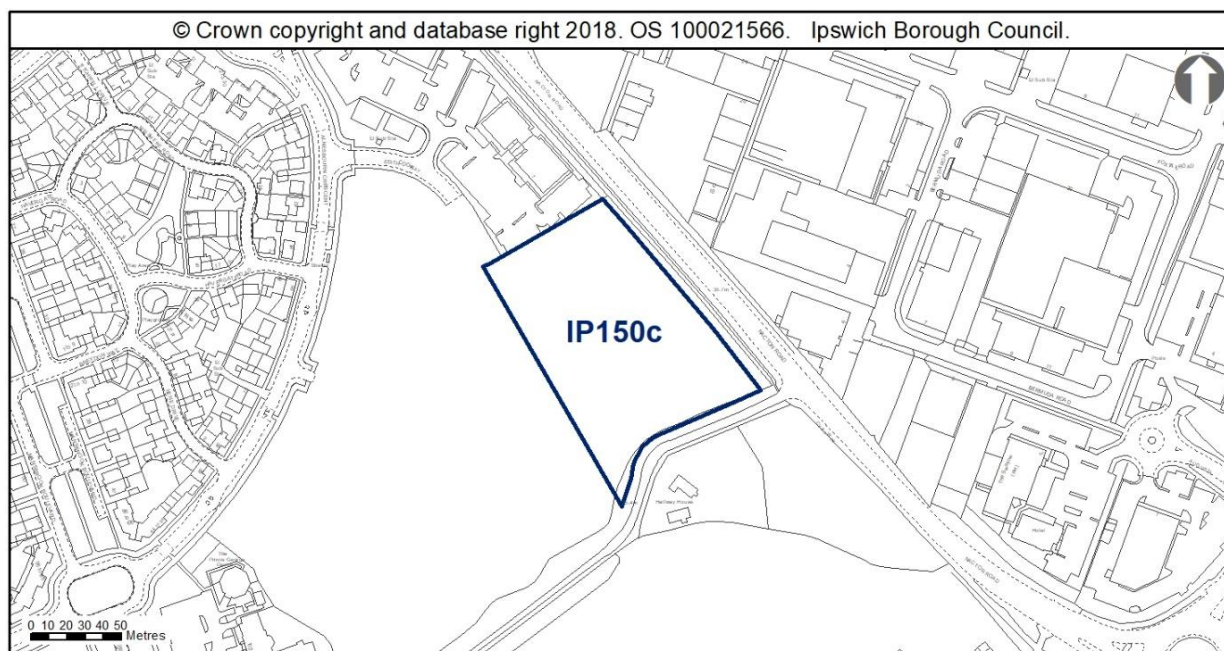
#### **Allocation Policy SP5**

Use(s)	Indicative capacity
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Primary	<del>B-Class</del> <u>Employment</u> uses ( <del>excluding office use B1a</del> <u>E(g) (excluding office use),</u> <u>B2 and B8</u> ) and appropriate employment-generating sui generis uses as defined through policy DM33	18,000 sq m
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Site ref: IP150c (UC267) Land south of Ravenswood

Site area: 1.18ha

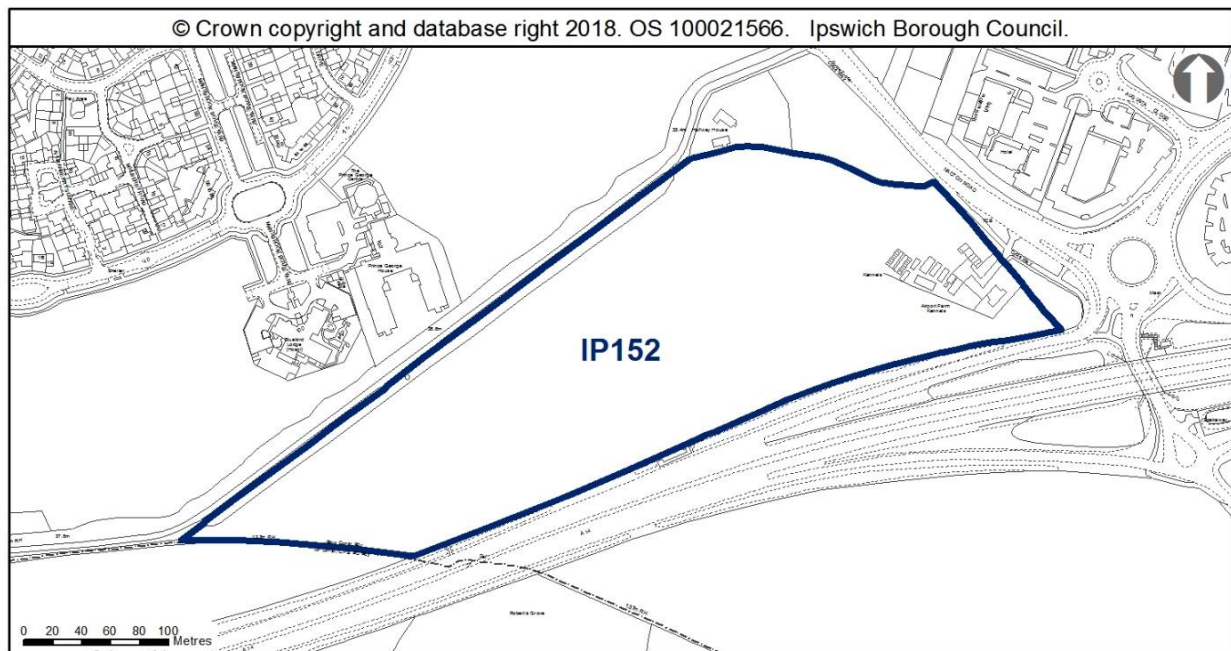


#### Allocation Policy SP5

Use(s)		Indicative capacity
Employment	<del>B1</del> <u>Business</u> uses ( <u>E(g)</u> ( <u>excluding office use-</u> <del>excluding office use B1a</del> ) and appropriate employment-generating sui generis uses as defined through policy DM33 (subject to policy DM18)	11,000sqm

Site ref: IP152 (UC269) Airport Farm Kennels, north of the A14

Site area: 7.37ha



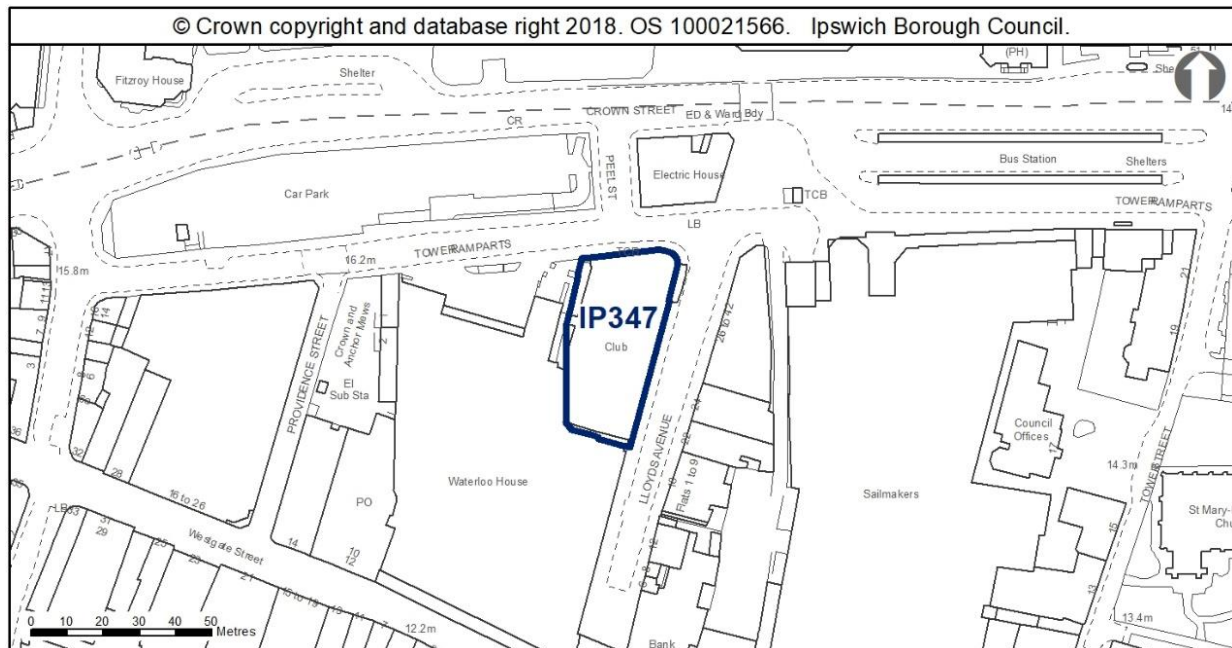
#### Allocation Policy SP5 & SP9

Use(s)		Indicative capacity
Primary	<p><del>B1, B2, B8</del> excluding B1a offices <u>Employment (E(g) (excluding office use), B2 and B8)</u></p> <p>Appropriate employment-generating sui generis uses as defined through policy DM33</p>	20,000sqm
Secondary	Feasibility of small section for Park & Ride to be explored	



Site ref: IP347 – Mecca Bingo

Site area: 0.12ha

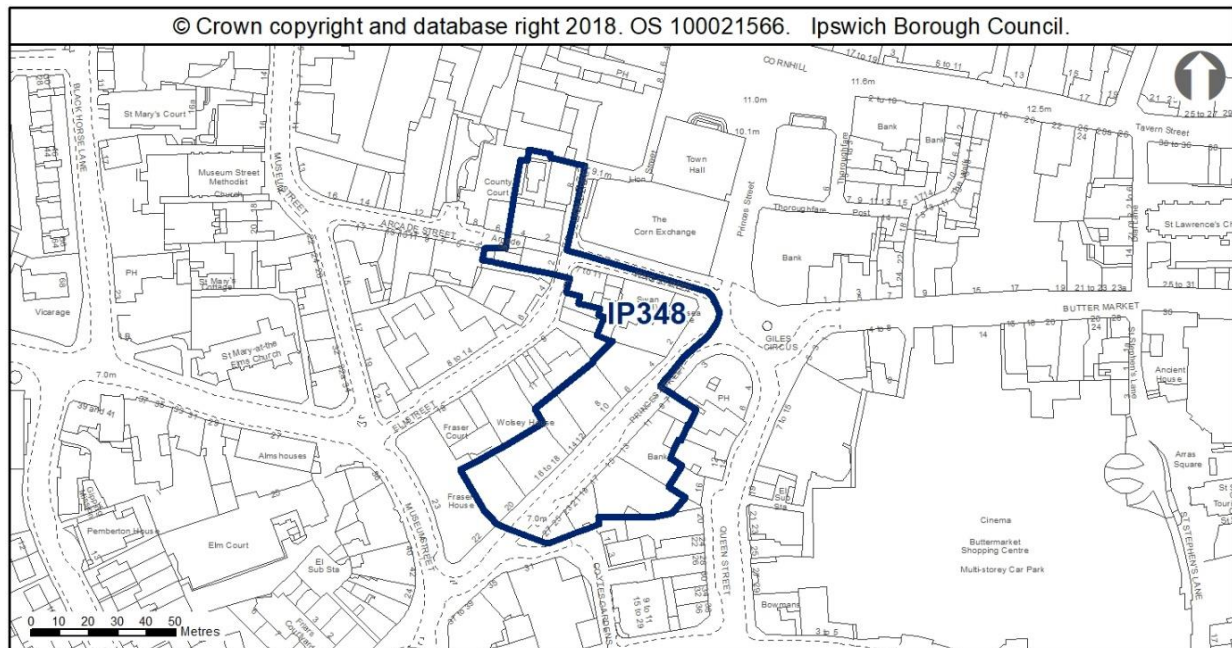


#### Allocation Policy SP10

Use(s)		Indicative capacity
Primary	Retail —A1	650sqm
Secondary	Bingo	-

**Site ref: IP348 – Upper Princes Street**

**Site area: 0.53ha**



**Allocation Policy SP10**

Use(s)		Indicative capacity
Primary	Retail —A1	400sqm

## Appendix 18 – Response to Question 4 of Inspectors Letter 03/12/2020

### **Introduction**

On 3 December 2020 the Council received a set of questions from the Inspectors of the ILPR examination regarding Matters 4 (employment) and 5 (retail) to be dealt with by way of written representations. Question 4 stated:

*“Paragraph 85d) of the NPPF expects plans to allocate sites in town centres to meet the scale and type of development needed, looking at least 10 years ahead. Table 3.2 of the Retail Position Update Statement (RPUS), August 2019 [D7], identifies a need for 9,900 sqm of comparison retail floorspace to 2029 and 14,300 sqm to 2031. However, Policy CS14 only seeks to provide for 10,000sqm of comparison retail floorspace to 2031 and the sites allocated in Policies SP10 and CS10 total just 9,710 sqm of comparison retail floorspace. The Council explains that this would meet the need for the 10 year interval to 2029. However, at adoption (2021 according to the LDS) the Plan would be expected to look 10 years ahead to 2031. As it stands, therefore Policies CS14, SP10 and CS10 do not make adequate provision for the comparison retail needs of the Borough to 2031. Therefore, the Plan is not positively prepared, justified or consistent with national policy in respect of its provision for retail floorspace. MMs are required to Policies CS14 and SP10 and their supporting text to ensure the Plan makes provision for the up to date comparison retail floorspace needs of the borough to 2031 as identified in the RPUS.”*

The ILPR, by way of Policy SP10 (Retail Site Allocations) of the Site Allocations Development Plan Document (DPD), allocates land for 10,550sqm net of comparison retail floorspace. For reference, the list of sites is provided in Table 1 below:

**Table 1 – List of ILPR Comparison Retail Sites**

<b>Site Ref</b>	<b>Address</b>	<b>Floorspace (Sq m net)</b>
IP347	Mecca Bingo, Lloyds Avenue	650
IP040	Former Civic Centre, Civic Drive (Westgate)	2,050
IP048b	West part of Mint Quarter	4,800
IP348	Princes Street	675
IP054	Turret Lane West	280
IP132	Former St Peter's Warehouse, 4 Bridge Street	140 (could be masterplanned jointly with IP136)
IP136	Silo, College Street	140 (could be masterplanned jointly with IP132)
IP037	Island Site	280

Policy CS2/ DM30	Co-Op Depot, Boss Hall Road (Sproughton Road District Centre)	315 (as per permission 18/00948/OUTFL)
Policy CS10	Ipswich Garden Suburb	1,220
Total		<b>10,550</b>

This amount would meet the 10 year period, as required by the NPPF, from 2019 – 2029. The main modification requested by the Inspectors effectively seeks to amend the 10 year period so that it covers 2021 – 2031 instead. The effect of this would be to require the ILPR to meet a need of 14,300sqm net comparison floorspace, albeit over a 12 year period as the 14,300sqm net figure covered the period 2019 - 2031. Based on Policy SP10, the ILPR would therefore have a shortfall of 3,750sqm net comparison floorspace.

The purpose of this paper is to justify why the Council considers it would not be appropriate to plan for this higher level of need.

### **Retail Position Update Statement (2019)**

In 2018, the Council commissioned an addendum update to the Retail and Commercial Leisure Study (2017) which was, at the time, the evidence base that would inform the emerging ILPR at the initial stage of plan-making. This was commissioned on the basis of local trends and changes that Ipswich had been experiencing in recent years (e.g. Retail Monitoring Reports), past rates of under-delivery of comparison retail floorspace in the Central Shopping Area against historically set targets, to ensure that the latest retail data from Experian was used and to take account of rapidly changing macro-level trends such as increasing store closures nationally and rapid take-up of internet shopping.

The 2019 retail position update statement identified that the forecast needs for comparison retail floorspace had shrunk significantly when compared to the 2017 study. Figure 3.2 of the 2019 update statement portrays this:

**Figure 3.2: Summary of Comparison Goods Floorspace Need in Ipswich Borough (sq m net) (after commitments/planning permissions)**

Year	2017 Retail Study		2019 Update		Difference	
	Min	Max	Min	Max	Min	Max
2026	9,600	17,600	4,100	7,600	-5,500	-10,000
2029	Not Tested	Not Tested	9,900	18,200	-	-
2031	20,800	38,100	14,300	26,200	-6,500	-11,900
2036	34,800	63,700	26,500	48,700	-8,300	-15,000

Source: Table 16c of Appendix B

List of commitments provided at Appendix B (Table 16d).

Assumes constant market share of Study Area expenditure claimed by facilities in Ipswich Borough

Table 16c of Appendix K, October 2017 Retail Study

As shown above, there was a 57% reduction to 2026, a 31% reduction to 2031 and a 24% reduction to 2036. This demonstrates a major downward trend in terms of forecast comparison retail need in a relatively short space of time of two years since the original 2017 study. Taking this into account, the Council considers that in the two years since the

2019 update statement was provided that this need has likely contracted further. This is following both the existing trend identified, and, the recent retail impacts that have been experienced both locally and nationally, as discussed in the subsequent sections of this paper.

### **Impact of Covid-19**

The Council's position on how the Covid-19 pandemic has impacted the ILPR and whether any modifications should be made to reflect it have been set out in previous responses by the Council in writing and at the relevant examination hearings. In short, it is too early to determine what the impacts of the Covid-19 pandemic would be in long-term and the Council believes it would be unwise to attempt to predict these effects without firm evidence.

For example, it is not possible to determine the impacts of the pandemic on the future demand and supply of office space as it will only become apparent once the Country has overcome the pandemic in full as to what the outcomes are (e.g. a potential take up of home working and less demand for office space). Offices in the Borough have not been permanently vacated, despite some being temporarily empty whilst employees work from home.

However, in contrast to the above example, there have been some permanent impacts on retail that will not be reversed once the pandemic has been overcome. The most perpetual of these is the permanent closing of retail shops in town centres. On a national scale there were over 15,000 store closures in Britain in 2020, as demonstrated in Figure 1 below:

**Figure 1 –Store Closures in Britain over five years<sup>1</sup>**

**Table 1**

**Outcomes for 2020 (to 31 December).**

<b>Retailing 2020 (to 31 December)</b>	<b>Administ-ration</b>	<b>CVAs</b>	<b>Rational-isation</b>	<b>Totals</b>
specific redundancies & rationalisation	NA	NA	13,969	13,969
multiples: stores closed	2,141	533	2,577	5,251
multiples: jobs lost	50,810	11,496	42,015	104,321
self-employed/concessions in larger shops	8,715	490	8,240	17,445
independent store closures	4,189	-	6,307	10,496
independent job losses	12,286	-	28,697	40,983
<b>Total Job losses</b>	<b>71,811</b>	<b>11,986</b>	<b>92,921</b>	<b>176,718</b>
<b>Total store closures</b>	<b>6,330</b>	<b>533</b>	<b>8,884</b>	<b>15,747</b>

\* Correct to 31 December 2020, based on our current information.

The Centre for Retail Research reporting shows that in 2018 there were 14,583 store closures and in 2019 there were 16,073 closures. This indicates that retail has been suffering before and not just because of the Covid-19 pandemic.

<sup>1</sup> <https://www.retailresearch.org/retail-crisis.html>

In addition, for Ipswich specifically, there have been 14 shops permanently closed in the Central Shopping Area in 2020 (see 'Ipswich Central Shopping Area Picture since January 2019' section).

Covid-19 may not have been in the only factor in the decision to close these shops but it will have accelerated the speed of it.

Footfall data from Springboard has shown that the pandemic has had a severe impact on the amount of trade that shops have received. For example retail footfall in the UK week to 2 January 2021 was 55.7% lower than the same week last year (Reuters, 2021<sup>2</sup>). At the local level, the Council's own footfall data correlates with this national picture showing a 56% reduction comparing the month of December 2019 against December. As shown in the later "Footfall" chapter, there was already a gradual decline in footfall numbers in the months that were recorded. Whilst it is likely that there will be a sharp increase, closer to the pre-pandemic footfall levels once the pandemic has passed, this lack of trading and the financial impact of this will have longer lasting impacts on the viability of these shops to bounce back. This is in contrast to the office and employment market, which although are currently not being occupied by any or some of their employees, are still largely able to operate and continue generating business during the pandemic.

### **Ipswich Central Shopping Area Picture since January 2019**

Since the Retail Position Update Statement, there have been some noticeable changes to the make up of the Ipswich Central Shopping Area in 2020-21 as shown below:

#### **Debenhams – Store Closure – December 2020**

In December 2020 it was confirmed that Debenhams is to close its stores. In Ipswich the Debenhams store on Westgate Street occupies the largest single-occupier floorplate unit in the town centre. It is positioned in the heart of the Central Shopping Area, a gross internal area of approximately 17,403 sqm and bookends the Cornhill square.

There are also concerns regarding Topshop and Topman in the Sailmakers Shopping Centre which are also owned by Arcadia.

#### **Lakeland – Store Closure – January 2021**

It was confirmed that Lakeland are to close their store (360sqm) at the Ancient House in January 2021. This is a prominent, Grade I Listed Building with two active frontages situated on the south-eastern corner of Buttermarket and St Stephens Lane.

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<sup>2</sup> <https://uk.reuters.com/article/uk-britain-retail-springboard/uk-shopper-numbers-tumble-23-3-as-covid-19-curbs-bite-idUKKBN299137>

#### Boots – Store Closure – July 2020

In July 2020 Boots left their store in the Buttermarket Shopping Centre, consolidating down to just the Sailmakers Shopping Centre store in the Central Shopping Area. Boots has been operating from the Buttermarket since it opened in 1992.

#### Burton and Dorothy Perkins – Store Closure – January 2020

Burton and Dorothy Perkins closed their store on Tavern Street in January 2020 in the Primary Shopping Zone. Like Debenhams, these stores are also owned by Arcadia.

#### Paperchase – Store Closure – April 2020

Paperchase closed its store on Tavern Street, across the road from Burton and Dorothy Perkins, in April 2020.

#### Whittard of Chelsea – Store Closure – February 2020

Another closure on Tavern Street in the Primary Shopping Zone, Whittard of Chelsea closed in February 2020.

#### Kiko – Store Closure – June 2020

Kiko had been operating out of its store on the corner of Tavern Street/ Dial Lane for four years before it closed in June 2020.

#### Hotter – Store Closure – July 2020

Adjacent to Kiko, Hotter closed in July 2020.

#### Jack Wills – Store Closure – October 2020

Jack Wills was operating out of a prominent and sizeable store on Tavern Street but closed in October 2020.

#### Quiz – Store Closure – September 2020

In September 2020 Quiz confirmed that their store in the Sailmakers Shopping Centre would not be re-opening.

#### Edinburgh Woollen Mill – Store Closure – November 2020

Occupying a prominent corner frontage on Buttermarket/ Dial Lane, Edinburgh Woollen Mill closed in November 2020.

#### Jessops – Store Closure – January 2020

Jessops on the Buttermarket closed in January 2020.

#### Office – Store Closure – July 2020

The shoe shop Office on Westgate Street has been closed since July 2020.

#### Little Waitrose – Store Closure – December 2020

The store opened in 2012 in the ground floor of the Corn Exchange, and closed on 6th December 2020.

## 2019

It's relevant to note that the above does not include the closures of other retailers in the Central Shopping Area which occurred in 2019 such as Cotswold Outdoor, Starbucks, Argos, Trespass, Riley & Riley Jewellers and 'Ohh Deer'.

## Openings

Although the picture has been broadly concerning in terms of the health of retail in the Central Shopping Area, there have been some positive changes. For example the former British Homes Store on the Buttermarket, which has been vacant since the collapse of the chain in 2016, is due to get a new lease of life as part of a sub-division of the unit to include Sports Direct, Game, UCS and Flannels shops which is anticipated to be occupied around later in 2021/Easter 2021. It should be acknowledged though that the Sports Direct would require the relocation of the existing large unit on Carr Street, rather than this store being in addition to it. Game also has a presence on Tavern Street in Ipswich and would no-doubt also close. The other significant positive outcome for the Central Shopping Area is the granting of permission for the former Post Office building on the Cornhill square to a more flexible use to encourage an active user.

## Ipswich Footfall Data

Data on footfall levels recorded in Ipswich town centre has been obtained from the Council's Economic Development Team. Graph 1 below illustrates the footfall levels recorded between September 2018 – December 2020. In terms of pre-Covid-19, there was a reduction of approximately 30,000 movements in September, October and November 2018 compared to the equivalent months for 2019. There was however a noticeable increase in December footfall in 2019 compared to 2018.

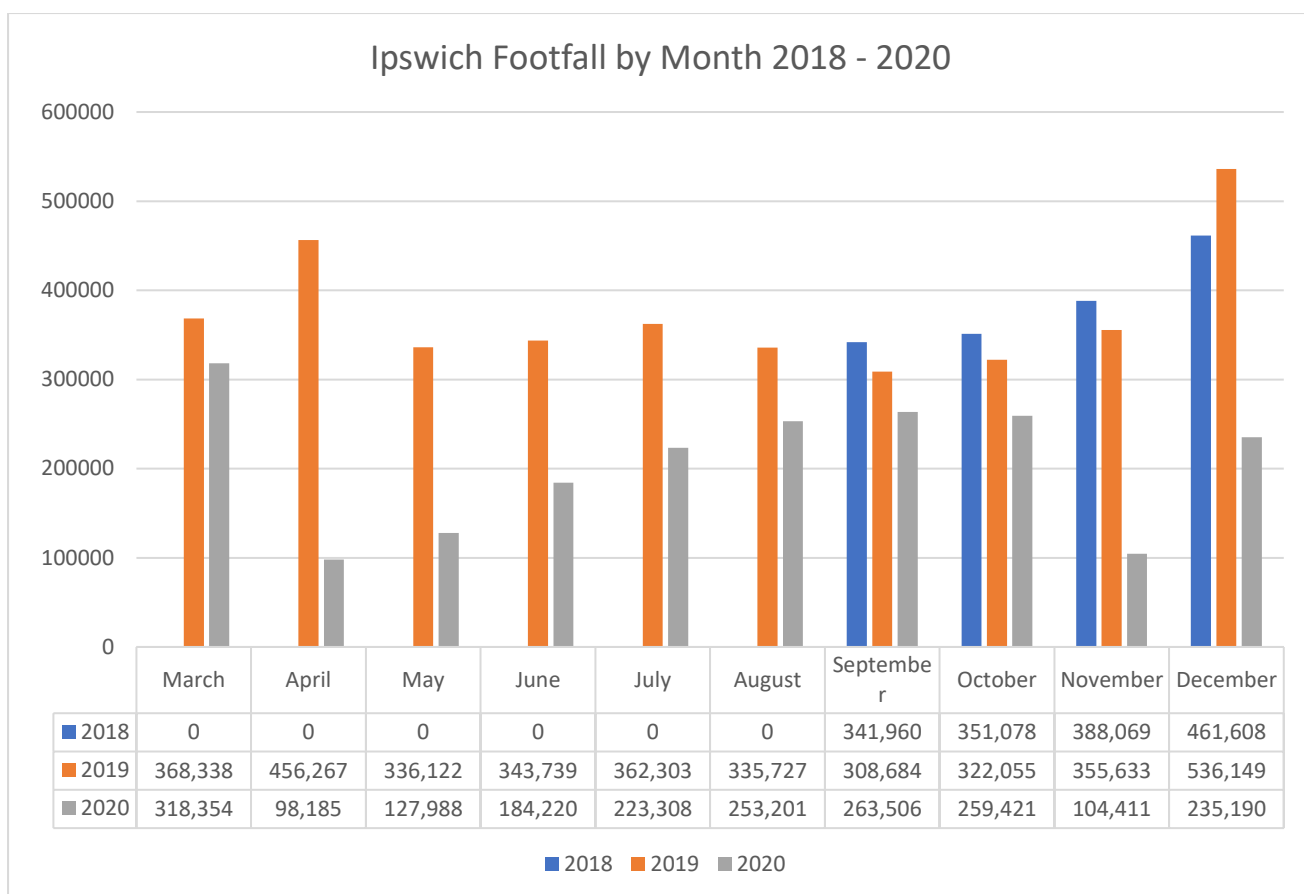
As demonstrated in figure 3, the impact of Covid-19 on footfall in the town centre has been severe. In April 2020, the first full month where restrictions came into effect, there was a 78% reduction in footfall. Footfall numbers then gradually increased through the following months to October 2020 as lockdown restrictions eased. However there was then a sharp reduction in November when a further lockdown was enforced. Footfall in December 2020 was 56% less than in December 2019, despite coming out of lockdown and subsequent Tier 4 restrictions only coming into effect post-Christmas. Overall, footfall for the year fell from circa 3.7million in 2019 to circa 2.1 million in 2020, a 45% reduction.

## Figure 3 – Ipswich Town Centre Footfall by Month 2018 -2020<sup>3</sup>

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<sup>3</sup> March – August 2018 not included as different method of counting used for those months. September 2018 – December 2020 using same method.





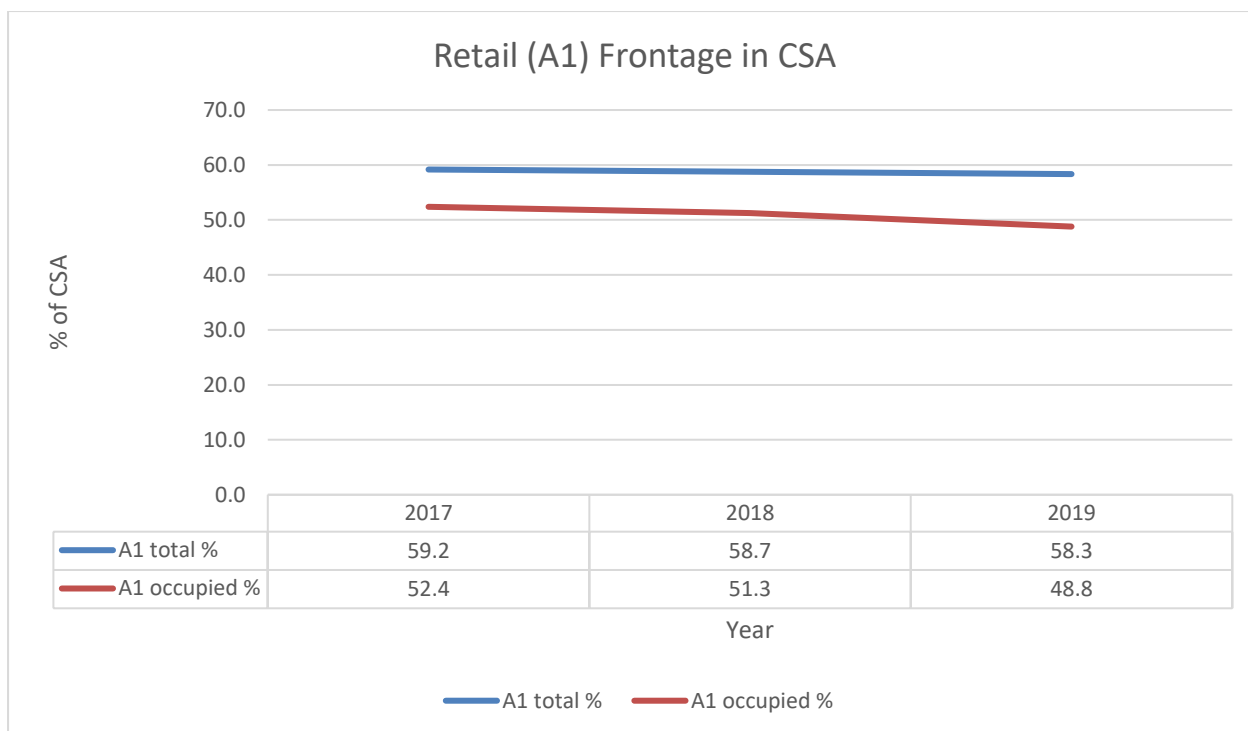
### **Ipswich Central Shopping Area (CSA) – Identified Frontages Survey Report 2019**

The Council annually prepares a CSA report to monitor the composition of the Primary, Secondary and Specialist Shopping Frontage Zones which combine to form the CSA. The latest available report is the November 2019 edition<sup>4</sup>. The results of this inform the Authority Monitoring Report (AMR) (CDL E1) and are summarised in the AMR.

The 2019 CSA report recorded that across the CSA, the amount of retail (formerly A1) has declined year-on-year since 2017, and, more significantly, the proportion of occupied (un-vacant) retail has shrunk at a greater rate in this same period. This is demonstrated in figure 4 below:

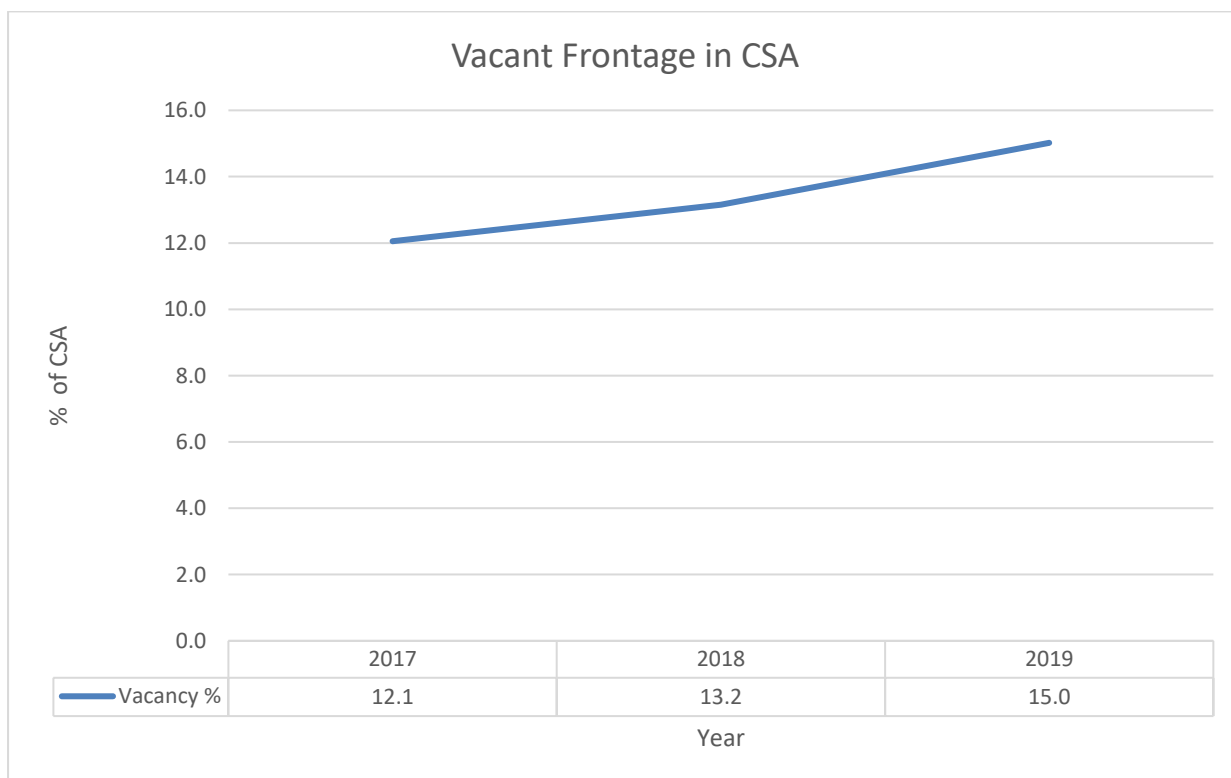
**Figure 4 – Retail Frontage in the CSA**

<sup>4</sup> [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019\\_csa\\_final\\_version.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019_csa_final_version.pdf)



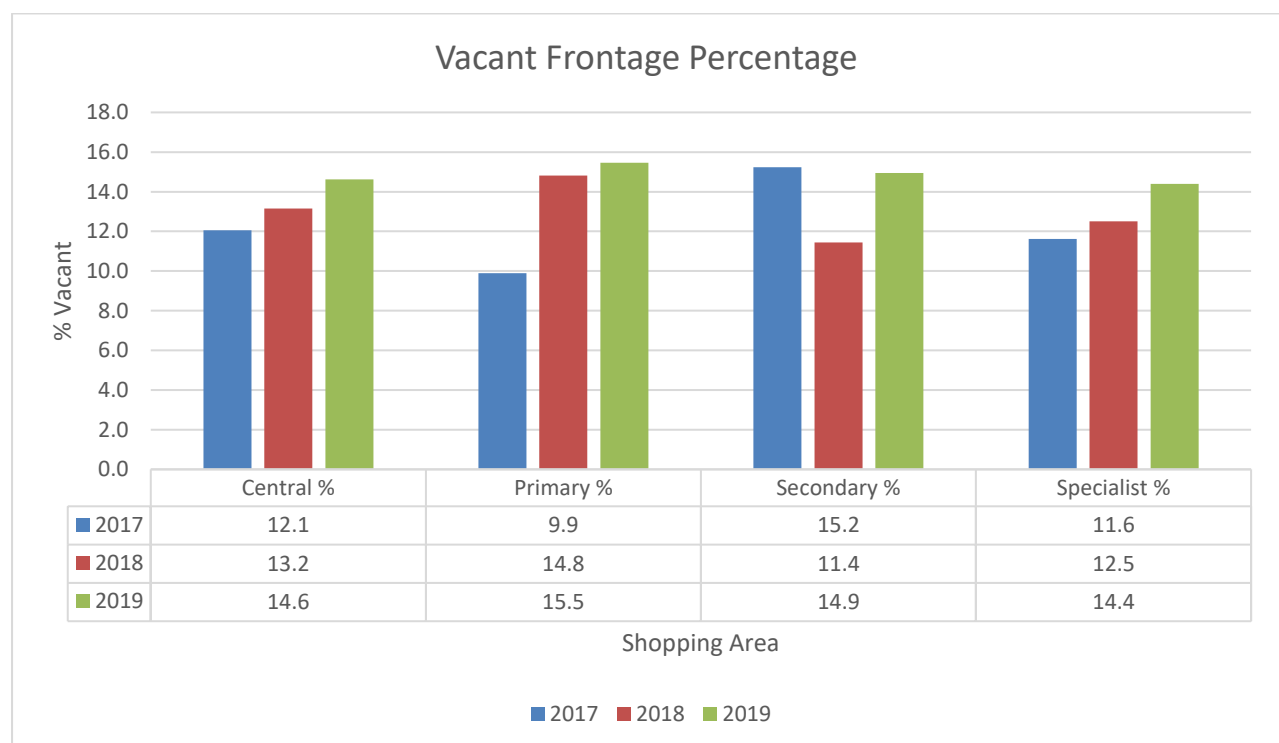
In addition to this, when looking at all the units which make up the CSA, the amount of vacant frontage has risen significantly over the three year period from 2017 – 2019, as demonstrated in figure 5 below:

**Figure 5 – Vacant Frontage in the CSA**



When you break down the vacant frontage by each shopping zone, it is also apparent that it is the Primary Shopping Frontage Zone where the increase in vacancy rates has been most critical, as shown in Figure 6 below. This equated to a 5.1% increase across the three-year period, with the majority of this being in the year from 2018 – 2019 (4.9%). This is important to note as it is in the Primary Shopping Frontage Zone where there is the highest critical mass of retail units. The fact that the Primary Shopping Frontage Zone has been so disproportionately affected compared to the other zones indicates that the retail market is particularly challenging on the high street. In contrast, the other zones which have lower proportions of retail units appear to be more resilient to change.

**Figure 6 – Vacant Frontage by Shopping Frontage Zone Type**



Overall, what the above data illustrates is that the retail market is extremely challenging in the Ipswich CSA at the moment and that the demand for retail is not buoyant. It's also important to note that the above data does not factor in any of the significant retail closures listed in this document that have occurred in 2020-21. Due to Covid-19 restriction, the Council has been unable to report on the frontages for 2020. Consequently, in all likelihood, the picture for retail at present will be poorer than shown here.

### **Ipswich Historic Performance against Retail Requirements**

Historically, Ipswich has been unable to deliver previously identified needs for retail floorspace in the Central Shopping Area. Figure 7 and Table 2 below demonstrate the

Council's performance against the 2010 Retail and Leisure Study<sup>5</sup>, which was the evidence that informed the previously adopted Local Plans (2011 & 2017).

**Figure 7 – Comparison Good Floorspace Need (Step 7) as identified in 2010 Retail and Commercial Leisure Study**

**TABLE 17: COMPARISON GOODS CAPACITY ASSESSMENT - 'INNER CATCHMENT AREA'**

	2010	2016	2021	2026	2031
STEP 1: <b>TOTAL EXISTING FLOORSPACE IN DISTRICT (m<sup>2</sup> net):</b>	151,293	151,293	151,293	151,293	151,293
STEP 2: <b>TOTAL FORECAST 'POTENTIAL' TURNOVER (£ m):</b>					
(i) Total 'Potential' Turnover (£ million):	£772.36	£920.59	£1,111.73	£1,344.55	£1,657.83
(ii) Average Sales Density (£ per sq.m):	£5,105	£6,085	£7,348	£8,887	£10,958
STEP 3: <b>TOTAL FORECAST 'BENCHMARK' TURNOVER (£ m):</b>					
(i) Total 'Benchmark' Turnover (£ million):	£679.62	£731.47	£787.23	£848.07	£913.61
(ii) Average Sales Density (£ per sq.m):	£4,492	£4,835	£5,203	£5,605	£6,039
STEP 4: <b>TOTAL FORECAST RESIDUAL EXPENDITURE:</b>	£92.73	£189.12	£324.50	£496.48	£744.21
STEP 5: <b>FORECAST TURNOVER OF COMMITTED FLOORSPACE (£ m):</b>	£89.13	£95.93	£103.24	£111.22	£119.82
STEP 6: <b>NET RESIDUAL EXPENDITURE AFTER COMMITMENTS:</b>	£3.60	£93.19	£221.25	£385.25	£624.39
STEP 7: <b>FORECAST CAPACITY FOR NEW COMPARISON GOODS FLOORSPACE:</b>					
(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	£6,500	£6,996	£7,529	£8,111	£8,738
(ii) Net Floorspace Capacity (sq m):	554	13,320	29,386	47,498	71,458
(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
(iv) Gross Floorspace Capacity (sq m):	791	19,029	41,981	67,854	102,083

**Table 2 – Comparison Good Floorspace delivered in Borough 2010 - 2016**

Period	2010 – 11	2011 – 12	2012 – 13	2013 – 14	2014 – 15	2015 – 16
Net Increase in retail floorspace (m2)	239	978	6,918 (Futura Park Phase 1 Out of Town)	6,284 (Futura Park Phase 2 Out of Town)	2,400 (outside central shopping area)	No data recorded

As shown above, whilst the broad 13,320m2 net floorspace requirement for 2010 - 2016 was achieved this was almost entirely delivered outside of the Central Shopping Area.

### **Ipswich Central**

The Council has engaged with Ipswich Central, the Business Improvement District for Ipswich, who have provided written comments to the Council on 7 January 2021. Ipswich Central are of the opinion that there is going to be an obvious fall out when it comes to the retail sector and that this will inevitably hit the high street in the next 3 – 6 months, and will spike significantly.

<sup>5</sup> [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/icd18\\_combined.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/icd18_combined.pdf)

They note the positive movement of the former BHS store (see 'Ipswich Picture' section above) but are cautious due to the fact it will be nil transaction for the town centre as it will leave a big space vacant in Carr Street and on Tavern Street. In looking at the future of town centres, for Ipswich, they are of the view that less retail is required which should be restricted to the core area of the town centre. They consider there will be no demand for retail space in the coming years and that town centres, such as Ipswich, must adapt to include experience with leisure, retail and service-led businesses.

Ultimately, they are of the opinion that town centres need much more variety and that retail is not the answer for them. A combination of residential, service-led, leisure, hospitality, office and then retail is how they perceive a successful town centre.

### **Summary**

In summary, the Council considers that the 9,900sqm net retail requirement for comparison goods in the Borough to 2031 is appropriate as this would be aspirational but deliverable (NPPF Para 16 (b)). The 9,900sqm net retail requirement is based on a 10 year time frame. It is acknowledged that this was derived from 2019 – 2029 but the Council considers this would be comparable to 2021 – 2031. Policy CS14 of the ILPR commits the Council to review retail need within five years of adoption. Increasing this requirement to 14,300 sqm net would not be deliverable.

As explained in this paper, there have been several factors which, in the Council's opinion, are relevant in justifying a figure of 9,900sqm.

Firstly, whilst the Council appreciates that the current Covid-19 context will likely be around in the medium to long-term, it has accelerated what was already a difficult trading environment for retail in regard to the dominance of on-line retail as a major part of peoples retail habits. This is evident through the volume of retail closures that Ipswich has experienced, driven by the decimation of footfall numbers in the town centre. This reflects the national picture where high streets have borne the brunt of this impact.

Secondly, the 2019 Retail Position Update Statement identified a 31% reduction in floorspace to 2031 compared to the findings of the 2017 Retail and Commercial Leisure Study. This update was commissioned to provide an updated floorspace requirement based on what the Council had experienced on the ground in terms of localised store closures and trends and how this might be reflected in more recent data, such as that from Experian. This 2019 update confirmed the Council's belief that the 2017 set figure for 2031 was not deliverable and this was echoed in a reduced floorspace figure in the 2019 update. As explained in the other sections of this paper, the Council has evidence to indicate that the retail climate has again evolved, and that demand has weakened compared to early 2019 when the report was commissioned. Subsequently the floorspace figure to 2031 is likely to be lower than originally forecast.

Thirdly, the Council has had several high-profile closures in the Central Shopping Area, including Debenhams, the largest floorplate unit in the heart of the town centre. Other high

profile closures include Dorothy Perkins/ Burtons, Boots and Lakeland. These closures clearly highlight the challenging retail context.

Fourthly, footfall was lower in September – November when comparing 2018 against 2019. In addition, this data evidences the crippling effect of the Covid-19 pandemic which, although is a short-term impact, will have long-term effects for businesses trying to recover.

Fifthly, evidence from the Council's Central Shopping Area Report 2019 demonstrates how retail vacancies have been increasing in recent years. In addition, vacancy increases were most substantial in the Primary Shopping Frontage Zone which critically is where the highest composition of retail units is. This evidences the challenges that the retail market is facing and how this has been exacerbated over recent years.

Sixthly, the Council has historically been unable to deliver high-levels of new comparison retail floorspace in the Central Shopping Area. As compared against the 2010 Retail and Leisure Study, it was only in locations outside the Central Shopping Area where the large bulk of comparison retail floorspace were delivered. Whilst the Council has confidence that the sites it has identified can deliver the vast majority of the 9,900 floorspace requirement in the Central Shopping Area, increasing the requirement above this is only likely to put pressure to deliver in less sequentially preferable locations, such as out-of-centre retail. The knock-on effect of this is to further undermine the vitality and viability of the Central Shopping Area, contrary to the vision and objectives of the ILPR and Paragraph 85(d) of the NPPF.

Finally, the Council has engaged with Ipswich Central, the Business Improvement District for Ipswich. It is clear from their comments that they do not consider a significant demand for retail floorspace in the town centre and consider that a consolidation of the existing retail picture is, at this time, is important for those retail outlets and businesses in the town centre which have survived the Covid-19 crisis and remain open.

In light of the above, the Council remains of the view that 9,900 sqm net comparison retail floorspace should be the retail requirement of the Borough to 2031.