

Ipswich Borough Council Local Plan

Topic Paper: Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document

Evidence on the updated context for the Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document

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Introduction

What the Council is doing

1. The Council is currently preparing a review of its adopted Core Strategy and Policies development plan document (December 2011) and a Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document. These documents form the Council's Local Plan, which guides future development in the Borough.
2. Proposed submission versions of the two plans were published for public consultation on 12th December 2014, under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulation 2012. This followed on from an informal consultation (under regulation 18) which was undertaken between January and March 2014. Following representations received on the Proposed Submission plans and changes in national policy, in October 2015 Pre-Submission Main Modifications were published for consultation.
3. The Core Strategy and Policies development plan document review (hereinafter referred to as the Core Strategy review) will replace the adopted Core Strategy and Policies development plan document when adopted (anticipated in mid-2016).
4. The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document (DPD) (hereinafter referred to as the Site Allocations Plan) is a new plan. It will replace the remaining saved policies of the adopted Ipswich Local Plan (November 1997) when adopted (anticipated in mid-2016).
5. The Council is undertaking a public consultation on Pre-Submission Main Modifications to the Core Strategy review, the Site Allocations Plan and their supporting sustainability appraisal and appropriate assessment reports with addenda. The consultation period will run from Friday 9th October 2015 to Monday 23rd November 2015 and further details can be found on the Council's website, www.ipswich.gov.uk/consultations, at the Council's offices at Grafton House and the Customer Services Centre at the Town Hall, or in Ipswich libraries.

National Planning Policy Framework – Plan Making

6. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF is national planning policy and Local Plan documents such as the Core Strategy must refer to the principles established in the document.
7. The NPPF notes in paragraph 182 that the Local Plan will be assessed at the Examination in Public on whether it has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.

8. The Duty to Cooperate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty on local planning authorities to co-operate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. The duty to co-operate came into force on 15 November 2011 and any plan submitted for examination on or after this date will be examined for compliance. Local planning authorities are expected to provide evidence of how they have complied with any requirements arising from the duty. Non-compliance with the duty to cooperate cannot be rectified after the submission of a plan.
9. The Inspector will first check that the plans meets the legal requirements under s20(5)(a) of the Act before moving on to test for soundness. Legal requirements include e.g. whether it is included in the Council's Local Development Scheme; whether the Council's Statement of Community Involvement has been followed; and whether documents have been published and made available for public inspection.
10. To be sound the plan must be:
 - **'Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.' (Para 182, p. 43)
11. Paragraph 15 of the NPPF notes 'a presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay' and plans include 'clear policies that will guide how the presumption should be applied locally' (p. 4).

Background

Relationship between the Core Strategy Review and the Site Allocations Plan

12. The Site Allocations plan complements the Core Strategy review by setting out the site specific detail that gives effect to the general strategy set out in the Core Strategy review. For example on housing, while the Core Strategy review sets the overall scale of housing growth for the whole Borough and makes the strategic allocations such as at Ipswich Garden Suburb (formerly the Northern Fringe), the Site Allocations plan

makes the other, smaller housing site allocations that will deliver homes the Core Strategy review has identified a need for.

13. The Site Allocations plan has been prepared alongside the Core Strategy review. The two plans complement one another and should be read together. For example, the Site Allocations plan may allocate a site for development, but the Core Strategy review development management policies set out criteria-based policies that would apply to that development.

The Development of the Site Allocations Plan

14. The Site Allocations Plan is a combination of two development plan documents which the Council originally started to prepare:
 - the IP-One Area Action Plan, which set out policies and proposals for central Ipswich including the town centre, Waterfront, Ipswich Village and the Education Quarter, and
 - the Site Allocations and Policies development plan document, which set out policies and proposals for the outer areas of the Borough.
15. The decision to combine the two plans was taken through the Council's fifth revision of the Ipswich Local Development Scheme, brought into effect in August 2012.
16. The preparation of the now combined Site Allocations Plan has been informed by:
 - feedback received during stages of public consultation throughout the plan preparation process;
 - a changing national and regional planning policy context;
 - information and evidence gathered by the Council;
 - sustainability appraisal and appropriate assessment; and
 - other plans and strategies of the Council and its partners.

Feedback during the Plan Preparation Process

17. The process of preparing the combined Site Allocations Plan began in 2005 when the Council invited people to submit views on issues that the Site Allocations Plan and IP-One Area Action Plan should address. Public consultation on issues and options was undertaken in June and July 2006 on the two development plan documents, with further comments invited on some additional sites in March 2007. Taking into account the consultation feedback on issues and options, evidence available at the time and the results of a sustainability appraisal of the options, two Preferred Options documents were approved on 19th November 2007 and subject to public consultation January-March 2008.

18. A Preferred Options Core Strategy development plan document was approved at the same time. The Core Strategy is the strategic plan for the whole Borough, which sets out the quantity and broad location of growth planned over the following fifteen years. The Core Strategy was adopted in December 2011 and is currently subject to a full review, focusing primarily on the Borough's growth figures and the approach to land at the Northern Fringe, now known as Ipswich Garden Suburb.
19. The Preferred Options documents were based on a spatial strategy of urban concentration, or finding as many urban brownfield sites for development as possible, to accommodate the growth that Ipswich was required to accommodate to meet the targets set by the East of England Plan. This included some areas of privately owned back gardens, which had been identified as possible sites through an urban capacity study to assess potential development land across the Borough. At that time, greenfield land at the Northern Fringe of Ipswich was not identified for development.
20. Through the Preferred Options consultation feedback, it became clear that the majority of the garden sites identified would not be available for development. Thus the now adopted Core Strategy allocated land for the development at Ipswich Garden Suburb, pursuing a strategy which combines urban regeneration in IP-One with a sustainable greenfield urban extension. The comments received through the Preferred Options consultation and the Council's responses to the main points raised can be viewed in the Site Allocations Plan Pre-submission Consultation Statement, November 2014 (see Appendices). The main points made and resulting changes to the plan are also described in the Consultation Statement (a link to the document on the Council's web site is provided below).
21. The Preferred Options stage Site Allocations and IP-One plans outlined the intended scope of the documents through identifying 'policy areas' and suggesting certain uses for sites. However, they did not contain specific policy wordings or firm site allocations. Therefore, a full, combined Site Allocations Plan was published in January 2014 for informal public comment. The draft plan provided full details of the Council's preferred options for the plan.
22. After the informal consultation closed in March 2014, the comments were taken into account and the plan revised. A summary of the comments received during this informal consultation period, and the Council's responses, may be viewed on the Council's website at Appendix 3 to the Pre-Submission Consultation Statement Nov 2014:
https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/site_allocations_and_policies_pre-submission_consultation_statement.pdf. The revised plan was subject to formal consultation between 12th December 2014 and 5th March 2015 and will be submitted to the government for examination in public in December 2015, following public consultation on the Proposed Pre-Submission Main Modifications.

National and regional policy context

23. During the time that the Preferred Options documents were published in November 2007 and the Core Strategy was adopted in 2011, the strategic policy context was provided by the East of England Plan 2008 and national Planning Policy Statements and Guidance. The East of England Plan set out the growth targets that the Borough was required to achieve for homes and jobs.
24. However, in March 2012, the national Planning Policy Statements and Planning Policy Guidance notes were substantially (though not entirely) replaced by the National Planning Policy Framework (the 'NPPF'). In January 2013, the East of England Plan was abolished, and in March 2014, the Government also published national Planning Practice Guidance ('PPG'), which replaced previous practice guidance notes which accompanied the Planning Policy Statements.
25. As a result, the adopted Core Strategy is subject to review to update the growth targets for the Borough and ensure alignment with the NPPF (e.g. updating references to planning policy statements). It is these revised targets which the draft Site Allocations Plan allocates land to help to deliver. Hence the Core Strategy review is being undertaken alongside preparation of the Site Allocations Plan.
26. The NPPF also forms the policy context for the Site Allocations Plan.

Information and Evidence

27. One of the tests of soundness of a plan is that it is 'justified'. It should be 'the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence' (see paragraph 10 above).
28. The Council assembled a large body of evidence in a Core Document Library during preparation of the adopted Core Strategy. The Core Document Library has now been updated to reflect the evidence base for the two Proposed Submission plans. The updated Core Document Library is available on the Council's website at <https://www.ipswich.gov.uk/content/core-document-library> .
29. The Council is required by the Planning and Compulsory Purchase Act 2004 to keep under review matters which may be expected to affect the development of the Borough or the planning of its development.
30. Information can be found in the Core Document Library documents. The Council has also published topic papers alongside this one, which explain the background to policy approaches in the Core Strategy review and Site Allocations Plan. Some key characteristics of Ipswich are briefly described below.

Demography and household change

31. The topic paper 'Reviewing the Ipswich Housing Figures' January 2015, updated in October 2015, explores trends in population and household change within the Ipswich housing market and focuses on forecasting growth to 2031 and identifying the objectively assessed housing need. Therefore, it is not covered in detail here. The growth figures it identifies for Ipswich Borough from 2011 to 2031 are population growth of 20,950 people (15.7% growth) and household growth of 13,550 households (23.1% growth), based on a trend migration assumption.
32. Comparing the forecast growth with recent change in the Borough's population and number of households, in the ten years between the 2001 Census and 2011 the population grew by 13.8% and households by 10.3% (see Table 1 below).

Table 1 Population and household change 2001-2011

Population and Household Change 2001-2011				
	2001	2011	Change	% change
Population	117,200	133,400	16,200	13.8%
Households	51,924	57,298	5,374	10.3%

Source: Census data from ONS

33. Looking at a longer term trend, the population of Ipswich Borough has grown steadily from 1993 to 2011, apart from a slight decline between 1993 and 1997¹.
34. The State of Ipswich report² describes some characteristics of the Ipswich population. The Borough has a relatively young population with 87,566 people (65.7%) of working age, which is 5% more than the average for the rest of Suffolk. The proportion of black and other ethnic groups represents 17.1% of the Ipswich population. The number of single residents has increased by 5.5% to 39,800 (37% of residents) which is significantly higher than the rate for the rest of Suffolk (26.9%). There are 6,770 one-person households over the age of 65.
35. There are 9,250 children under the age of 5, which is 21% of the total in Suffolk. Ipswich has a younger age profile than Suffolk (16-64) and is seeing an increase in the number of children under the age of 5.
36. People aged 80+ are also a growing segment of the Ipswich community. This population has increased by 12.3% to 6,300 since 2001, with significant rises of 14.2% in the 85-89 years age group to a total of 2,000 people, and 21.6% to 1,100 in the over 90 years age group³.

Housing

37. The topic paper 'Reviewing the Ipswich Housing Figures' January 2015, updated October 2015, explores trends in the Ipswich housing market area (which includes

¹ Office for National Statistics mid-year population estimates

² State of Ipswich Report, IBC, June 2014

³ Neighbourhood Statistics, Office for National Statistics – updated January 2013

neighbouring districts), drawing key findings from the Ipswich Strategic Housing Market Assessment Update 2012. Therefore, these matters are not covered in detail here.

38. The average number of dwellings completed in the Borough annually between mid 2001 and March 2011 was 690, reaching a peak of 1,413 in 2007-08. Since the peak, completions have dipped and between 2011 and 2015, 1,017 dwellings were completed in total. The longer-term affordable housing delivery average as a percentage of total housing completions for 2001-11 is 21%, and for 2001-15 is 24%. Between 2001 and 2015, 93% of all housing completions took place on previously developed land and 42% within the IP-One area⁴.

Education and Deprivation

39. The Index of Multiple Deprivation 2010 shows that Ipswich ranks 72nd out of 294 local authorities in terms of the extent of deprivation. Nine areas of the town are ranked within the top 10% most deprived areas nationally. These are small areas generally located within the north-western and south-eastern parts of the Borough. 7,425 children live in households where no-one works. Ipswich has a higher proportion of people claiming benefits (16.4%) than the county (11.7%) and national averages (14.3%) (State of Ipswich Report, 2014).
40. The average proportion of pupils at Key Stage 4 gaining five or more A*-C grades including English and Maths over the five academic years (2008-2012) was 44.7% in Ipswich compared with 52% in Suffolk. In 2011, Ipswich had lower working age skills levels, especially at degree level (28.9%) than the national average (31.2%), but this is higher than the county as a whole (27.2%) (State of Ipswich Report, 2014).

Employment

41. The 'Employment Topic Paper' January 2015, updated October 2015, explores trends in employment in all sectors, and the development of land for business (Use Class B1), general industry (Use Class B2) and storage and distribution (Use Class B8). It focuses particularly on forecasting employment growth to 2031. Therefore, these matters are not covered in detail here.
42. In brief, the East of England Forecasting Model (EEFM), which is used to model employment change and is run annually using updated information, estimated in 2013 (the baseline run) that Ipswich had 72,900 jobs at 2011 and that this will rise by 6,100 to 79,000 by 2021 and by 11,400 to 84,300 by 2031. The 2014 baseline run indicates jobs growth of 12,400 to 2031. Long term trends in the sectors show continued decline in manufacturing and public administration, and growth in professional services, business services and health and care.

⁴ Ipswich Housing Land Availability Report March 2015, IBC web site https://www.ipswich.gov.uk/sites/default/files/hla_report_2014.pdf and draft Report 2014-2015.

Retail and centres

43. The Town Centre and Retail Topic Paper January 2015, updated October 2015, explains the retail and town centre policies of the Proposed Submission Core Strategy and Policies Review Development Plan Document 2014 and the Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document 2014. It explains the proposed strategy and policies for retail and the town centre in the context of national planning policy, other local initiatives and plans relevant to Ipswich and recent trends. Therefore, these matters are not covered in detail here.
44. Certain retail indicators are monitored on an annual basis by the Council, in order to check the health of the town and district centres in Ipswich. From April 2012 to March 2013 inclusive, there was a net increase of 6,409 sq m of retail floor space, which is mainly attributed to the new John Lewis and Waitrose enabling development at the former Crane's factory site on Futura Park, off Ransomes Way. Elsewhere around the borough, 509 sq m of additional floor space has been added in the form of mezzanines at the former Halfords site, London Road. During 2013/14, phase 2 of Futura Park was completed as enabling retail development providing a total of 6,284 sq m of additional retail floorspace. There were no large scale retail completions during 2014/15.
45. Levels of vacancy within the local and district centres and the central shopping area are monitored as part of retail surveys reported annually. In the town centre, vacancy in April 2015 was observed to be 16.4% of units, representing an increase on 2014 rates. In the local and district centres, of the total of 663 commercial units, 68 (10.3%) were vacant, being broadly similar to 2014 rates.

Transport

46. Transport modelling work undertaken for Ipswich Borough Council and Suffolk County Council by consultants Aecom in 2010 informed the adopted Core Strategy on transport (see Core Document Library document reference ICD48). It remains relevant and is currently being updated. More recent information from the 2011 Census Neighbourhood Statistics shows that, in Ipswich, the number of households without access to a car or van has decreased slightly from 29.35% in 2001 to 27.8% in 2011.
47. Information available on travel to work from the 2011 Census indicates that there are commuting journeys out of and into Ipswich. The net flow is inwards and amounts to 6,171 workers travelling into Ipswich. The gross inward flow is 27,516 workers. The most significant flows are from Suffolk Coastal, Mid Suffolk and Babergh⁵.

⁵ Commuting Patterns in the United Kingdom 2011 Census

<http://www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow0&period=0&fix=E07000202&view=200,-40,640,640&tr=-1678.9059276981052,-1096.6692120191128&sc=3.204279510358488>

48. Implementation of the Travel Ipswich scheme was completed in September 2015. The scheme consisted of a package of measures aimed at improving the travel experience for all users of the town. Works included traffic management measures such as the installation of traffic lights at Handford Road/Portman Road and Civic Drive/Princes Street, measures for public transport users such as bus station improvements and real time information, and improvements to pavements and crossings for pedestrians and cyclists.

Heritage and the environment

49. There has been a slight increase in the area of land designated for biodiversity importance in Ipswich since 2008. The 2014 Authority Monitoring Report indicates that the area designated as County Wildlife Site in the Borough currently stands at 226.57 hectares spread over 21 sites, which is an increase from 191.6ha in 2008. There has been a further increase 2014-2015 of 36.61ha. The Ipswich Wildlife Audit of 2000 has been updated through a 'Phase 1 (extended) habitat survey', which looks at the range of habitats available on many sites across Ipswich. Results of the survey work were published on the Council's web site in 2013 and 2014. The survey update included some sites earmarked for development, designated open spaces and County Wildlife Sites.
50. The Council has undertaken work to identify the proportion of tree canopy cover in the Borough in recognition of the value of trees to health, biodiversity, environmental quality, water management, landscape and adaptation to climate change e.g. shading and urban cooling. A survey of 147 English towns and cities found that on average the tree canopy cover is 8.5%, whereas Ipswich's tree canopy cover is currently 12%. The Council's Open Space and Biodiversity Policy 2013 identifies the target to increase tree canopy cover in Ipswich to 22% by 2050. This standard is based on the maximum canopy cover achieved in existing areas of Ipswich and the potential for further tree planting.
51. Some of central Ipswich lies within flood risk zones identified and mapped by the Environment Agency. The Ipswich Flood Defence Strategy was approved in March 2006 and recommended the construction of new flood defences for Ipswich. The strategy is being implemented in three phases and progress is as follows:
- raising the lock gates at the entrance to the Wet Dock, completed December 2008;
 - raising the river walls on the east and west banks to the south of the Island Site was completed in 2011; and
 - installing a tidal flood barrier in the New Cut at the southern end of the Island Site is due for completion during 2017.
52. In September 2013 the Council adopted a supplementary planning document on Development and Flood Risk. It supports policy DM4 in the adopted Core Strategy and aims to assist developers and their agents in submitting appropriate flood risk and flood risk management information with planning applications.

53. Air quality continues to be an issue in some parts of Ipswich. The Borough currently has four Air Quality Management Areas (AQMAS): Norwich Road/Chevallier Street junction, Bramford Road/Chevallier Street junction, Crown Street to St Margaret's Plain and Grimwade Street/St Helen's Street and the Star Lane Gyratory. They have been declared because of the level of nitrogen dioxide in the air, which results from motor traffic. The Council is currently considering whether to declare additional AQMAS or make amendments to the existing areas.
54. In terms of the built heritage, in September 2013 the Council adopted its Local List supplementary planning document (SPD). It updates the Ipswich Society's 1984 Local List of buildings of townscape interest in Ipswich. These are buildings which, although not meeting the national criteria for listing, are important locally either by themselves or as part of a group. The SPD supports Core Strategy policy DM9 Buildings of Townscape Interest and helps to further the Council's objective of preserving and enhancing the historic fabric and special character of Ipswich.
55. An Urban Character Supplementary Planning Document is also currently being prepared in stages for areas of Ipswich which do not fall within the defined conservation areas. The aim of this work is to identify what makes areas distinctive and to ensure that local character is protected and enhanced through new development. Part 1 of the Ipswich Urban Character Supplementary Planning Document, covering Parks, California, Norwich Road and Gipping and Orwell Valley, was adopted by the Council on 28th January 2015. Part 2, covering Chantry, Stoke Park and Maidenhall, is due to be considered for adoption in November 2015. Work on the remaining outer areas of Ipswich is due to commence during late 2016.
56. There is currently one listed building of Grade II* or above on the Historic England 'At Risk' register in Ipswich. In 1987, 44 buildings out of 550 were considered to be at risk. There are six buildings on the Suffolk Buildings at Risk Register for buildings below Grade II*.

Health and well being

57. There are significant health inequalities within Ipswich, which result in life expectancy being 8.4 years lower for men and 5.2 years lower for women in the most deprived areas of Ipswich than in the least deprived areas. 5.1% (6,760) of the residents of Ipswich described themselves as being in bad or very bad health. This is slightly higher than the Rest of Suffolk at 4.7% (28,049) (State of Ipswich Report, June 2014).

Sustainability Appraisal and Habitats Regulations Assessment

58. Sustainability appraisal has been an integral part of the preparation of the Site Allocations Plan. The issues and options consultation documents prepared in 2006 were appraised in-house and the information used to inform the Preferred Options plans.

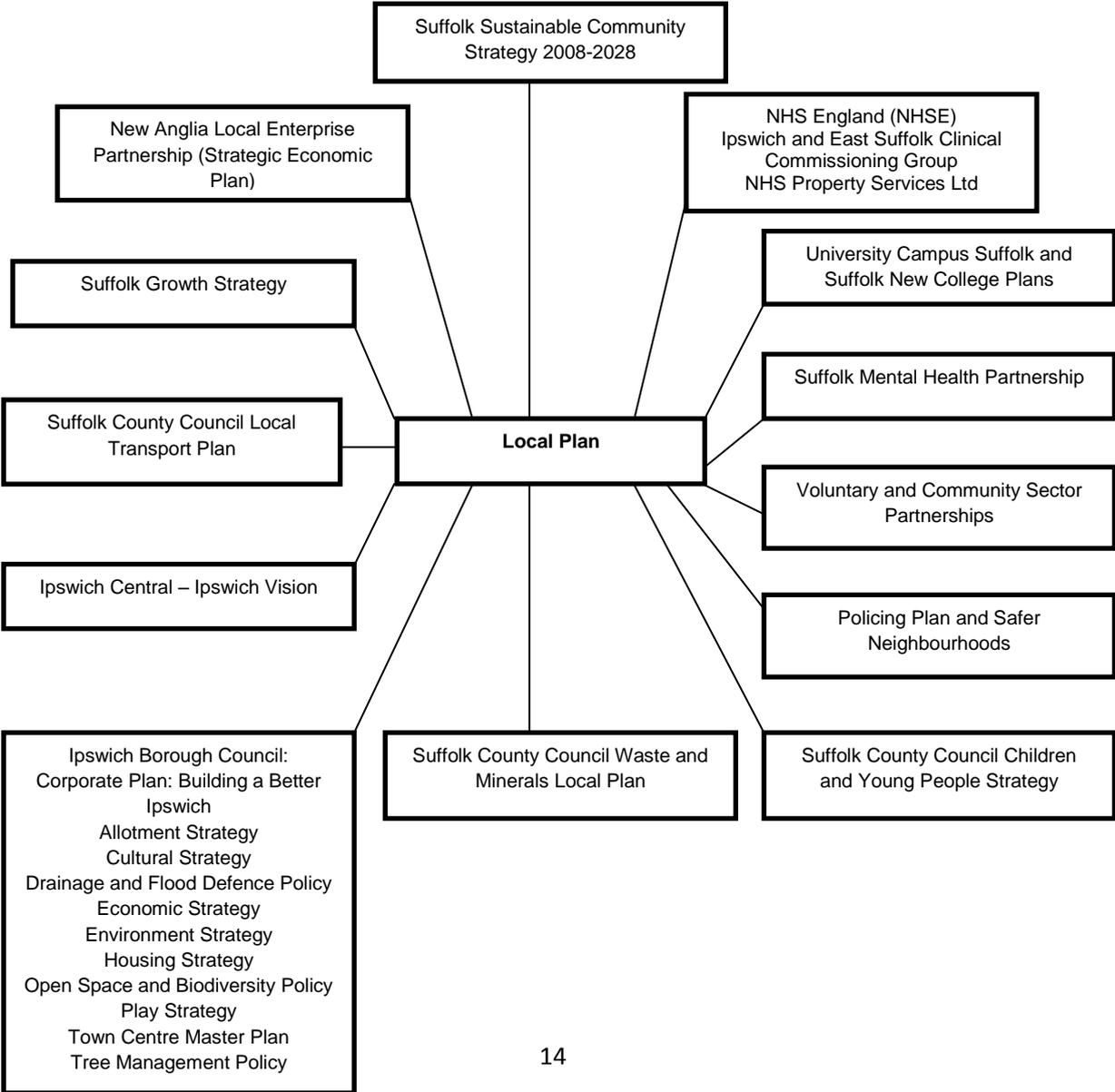
59. A Sustainability Appraisal Report for all three Preferred Options documents – the Core Strategy, IP-One and Site Allocations – was published alongside the Preferred Options consultation documents in 2008 and comments on it were invited.
60. The consultation draft Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document October 2013, which combined the previously separate plans, was subject to sustainability appraisal incorporating Strategic Environmental Assessment. An interim report on the findings of this process was published for comment alongside the draft Site Allocations Plan from January to March 2014. The recommendations have been taken into account in drafting the Proposed Submission version of the plan. Comments received through the Sustainability Appraisal process have also been taken into account as appropriate.
61. The Proposed Submission Site Allocations Plan has also been appraised (incorporating Strategic Environmental Assessment). The full report and a Non-Technical Summary are available for comment alongside the draft plan. Also published is an ‘Annex to the Proposed Submission Sustainability Appraisal Reports Addressing Recommendations’ (December 2014) which explains how the findings of the Sustainability Appraisal process, particularly the recommendations for mitigation measures needed, have been responded to in the plans <http://ipswich.jdi-consult.net/documents/pdfs18/Annex%20to%20Proposed%20Submission%20Sustainability%20Appraisal%20Reports.pdf>. The Pre-Submission Main Modifications to the Site Allocations Plan have also been subject to sustainability appraisal and an addendum has been published.
62. Also available is a separate Habitats Regulations Assessment report prepared under the Conservation of Habitats and Species Regulations 2010 (an ‘HRA report’). The report concludes that: ‘Policies in this Plan do not have cumulative effects on European sites. The whole plan adds detail but no additional development or any additional cumulative effects than that which was assessed for the Proposed Submission Core Strategy and Policies DPD Review. The Proposed Submission Core Strategy and Policies DPD Review has been found to have no adverse effect upon the integrity of any European site, and the Draft Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD similarly has no impact upon those European sites.’ This conclusion is based upon the fact that a number of mitigation measures are proposed through the HRA report for the Core Strategy Review. An addendum to the HRA report has been produced to consider the impacts of the Proposed Pre-Submission Main Modifications and it concludes that the earlier HRA conclusions have not changed.
63. Through the Sustainability Appraisal process, alternative strategies have also been considered. The assessment of strategic alternatives was undertaken as part of the development of the Core Strategy and included assessing the potential to meet housing needs through increasing densities on brownfield sites rather than developing the garden suburb. The role of alternatives in relation to site allocations is therefore limited to considering details around the development of each specific site. The

Sustainability Appraisal of the Proposed Submission Site Allocations plan explains how these alternatives have been considered.

Plans and Strategies of Ipswich Borough Council and partners

64. The Council is the local planning authority for Ipswich Borough and, as such, it is responsible for preparing the Local Plan. However, delivering the Local Plan vision for Ipswich will involve many other organisations and individuals. Therefore it is important to recognise the relevant plans and strategies of the Council and key partners. Figure 1 below (from the Core Strategy review) identifies some of the key partnerships, plans and strategies providing the context to the Local Plan (see over). Figure 1 now includes reference to the Ipswich Vision called 'Turning our Town Around', which was produced by Ipswich Central and to which the Council became a signatory in July 2015. Paragraph 58 of the Town Centre and Retail Topic Paper provides more information.

Figure 1 Context for the Ipswich Local Plan



65. These plans and strategies have been taken into account as appropriate in preparing the draft Site Allocations Plan.

Changes to the Proposed Submission Site Allocations Plan

66. The informal consultation draft of the Site Allocations plan, which was published in October 2013 and subject to public consultation January-March 2014, contained some policies which have been deleted from the Proposed Submission draft. The material from these policies has, for the most part, been incorporated into the Core Strategy review. The reason for this is that Core Strategy review has changed from being a focused review just looking at strategic matters such as the scale of growth, to a full review of the plan. This has allowed a more fundamental look at where policies would best sit to make the plans user friendly, e.g. by grouping all development management ('DM') policies together. The policies deleted from the Site Allocations plan and now incorporated into the Core Strategy review are outlined below in Table 2 below.

Table 2 Policies deleted from the Proposed Submission Site Allocations Plan November 2014 compared with the consultation draft of October 2013

Previous Site Allocations policy reference October 2013	New location within Core Strategy Review November 2014	Reasons
DM33 Green Corridors	DM33 Green Corridors	The policy identifies the green corridors and sets out the approach to development within them, therefore it is located with the other development management (DM) policies in the Core Strategy review.
DM34 The ecological network	DM31 The Natural Environment	To rationalise all detailed policy for habitats and wildlife into one policy rather than two policies in two plans.
DM35 Countryside	DM34 Countryside	The policy identifies areas of countryside and sets out the approach to development within it, therefore it is located with the other development management (DM) policies in the Core Strategy review.
DM36 Employment Areas	DM25 Protection of Employment Land	To bring together the policy which defines the employment areas through the policies map with the policy that applies to development within the areas.
DM37 District and Local Centres	DM21 District and Local Centres	To bring together the policy which defines the centres through the policies map with the policy that applies to development within the

		areas. Avoids the potential confusion of two policies with the same title.
DM46 Port of Ipswich	DM25 Protection of Employment Land	The allocation has been deleted, as the Appropriate Assessment identified the potential for significant effects on the SPA, e.g. in connection with jetties. The Appropriate Assessment indicates that the issues are not necessarily insurmountable (see paragraph 6.1.7) but the level of uncertainty has informed the de-allocation of the site. The site remains within an employment area which is covered by Core Strategy review policy DM25. The Port is a statutory undertaker and therefore subject to regulations requiring Appropriate Assessment for any projects (requiring planning permission or not requiring planning permission).
DM47 Central Shopping Area	DM20 The Central Shopping Area	To bring together the policy which defines the Central Shopping Area through the policies map with the policy that applies to development within the area. Avoids the potential confusion of two policies with similar titles.
DM48 Primary, Secondary and Speciality Shopping Areas and Frontages	DM20 The Central Shopping Area	To bring together the policy which defines the shopping frontages through the policies map with the policy that applies to development within the identified frontages.
DM50 District and Local Centres within IP-One	CS2 The Location and Nature of Development and DM21 District and Local Centres	To bring together the policy which defines the centres within IP-One with the policy that applies to development within all district centres.
DM51 Town Centre Boundary	DM22 Town Centre Uses Outside the Central Shopping Area	To bring together the policy which defines the town centre boundary with the policy that applies to development within the town centre.

67. The Pre-Submission Main Modifications to the Site Allocations Plan, published for public consultation on 9th October 2015, update the sites information in the plan from 1st April 2014 to 1st April 2015. This is to ensure that the plan is as up to date as possible at submission. The effect of this is that some sites previously included under policy SP3, because they had an existing planning permission, have been moved to policy SP2 and/or SP5 and SP6 because that consent has now lapsed. Likewise, one site previously allocated through SP2 has been moved to SP3 as it has gained planning permission during the twelve month period. An 'Additional Modification' proposed to the Site Allocations Plan is to relocate the content of policy SP4, Land Protected for Gypsy and Traveller Sites, to Core Strategy Review policy CS11 Gypsy and Traveller Accommodation. This has been proposed in order to avoid confusion that could arise from having two policies in two separate plans. For the purposes of public consultation, the modification is picked up through the Main Modifications to Core Strategy policy CS11.

Overview of the Site Allocations Plan

68. The Proposed Submission Site Allocations Plan has a focus on site allocations and delivering development, therefore, the issues it sets out to address reflect this role. Paragraph 2.11 of the Plan refers to the key strategic challenges for Ipswich identified through the Core Strategy review paragraph 5.25, but it also identifies the more detailed issues emerging from the evidence, which the Site Allocations plan needs to address, as follows:
- allocating sufficient land to meet objectively assessed housing need in accordance with the National Planning Policy Framework;
 - allocating enough good quality land to attract and retain jobs within the Borough;
 - allocating suitable and available sites for future town centre development to attract new investment in the centre without over stretching it;
 - planning for a sharp rise in the number of primary school age children;
 - tackling deprivation in the worst affected wards;
 - supporting the completion of regeneration projects at the Waterfront;
 - enhancing pedestrian and cycle connections across and around the town, particularly between the Waterfront and town centre;
 - addressing the conservation and enhancement of heritage assets and biodiversity,
 - ensuring that policies and allocations support the health and wellbeing of people in Ipswich; and
 - ensuring that demands placed on new development do not render it non-viable.
69. Chapter 1, Introduction, explains the scope of the document, its status and the stage reached in its overall preparation. The Plan is then structured around four parts, A to D, which are described below. Part A, The Context, contains two chapters. Chapter 2, The Ipswich Local Plan, explains the documents which make up the Ipswich Local Plan, defines the IP-One boundary for the IP-One Area Action Plan and identifies the key issues the plan needs to address. Chapter 3, Vision and Objectives, sets out the Council's vision for Ipswich as included within the Core Strategy review and identifies some of the key objectives for achieving it. It also cross refers to recommendations from the Council's Town Centre Master Plan 2012.

70. Part B, The Policies, contains two chapters. Chapter 4, Site Allocations, sets out land allocations for residential uses, employment uses, open space, community facilities, leisure uses, mixed use sites and transport uses and protects existing open spaces. This includes allocations within IP-One. Chapter 5, IP-One Area, sets out the retail allocation, policy for arts, culture, and tourism, policy approaches to the Waterfront, Education Quarter and Ipswich Village and IP-One transport matters.
71. Table 3 below sets out a brief summary of the policies contained in the Proposed Submission Site Allocations Plan, November 2014, as updated through the Proposed Pre-Submission Main Modifications. The policy reference prefix was changed from 'DM' (in the consultation draft dated October 2013) to 'SP' (in the proposed submission draft dated November 2014), because the DM development management policies have been rationalised and are now grouped together in the Core Strategy review for clarity and ease of use. The policies remaining in the Site Allocations plan are site policies, hence the 'SP' prefix.

Table 3 Brief summary of the policies contained in the Site Allocations plan, incorporating the Proposed Pre-Submission Main Modifications

Policy reference and title	Summary of Policy Content
Chapter 4 Site Allocations	
Policy SP1 The protection of allocated sites (formerly DM38)	This policy safeguards allocated sites for the use or uses for which they have been allocated, other than if it can be shown they are not needed <i>and</i> not viable (and not likely to be).
Policy SP2 Land allocated for housing (formerly DM39)	This policy allocates sites for 100% residential use or for mixed use including some residential use. There are 43 sites with an indicative total capacity of 1,929 dwellings. The baseline date for this plan is 1 st April 2015 to tie in with housing completions monitoring (which uses the financial year). There may be some sites allocated through this policy which have been granted planning permission for development since 1 st April 2015. The allocation does not in any way affect these permissions; it is simply a reflection of the fact that the plan needs to have a baseline date for the purposes of calculating the housing land supply. The site allocations help to meet housing requirement quantified through the Core Strategy review. Core Strategy review policy CS7 Table 2 sets out a housing requirement of 10,207 additional dwellings to be provided in the Borough to 2031 and policy CS7 indicates how the figure will be achieved.

<p>Policy SP3 Land with planning permission or awaiting a Section 106 (formerly DM40)</p>	<p>A significant part of the Ipswich housing land supply (1,897 dwellings) is represented by development proposals with a resolution to grant permission, or unimplemented permissions or developments which have started and then stalled. Therefore, this policy is considered necessary to indicate that the Council will require an element of residential use, should applications for alternative schemes be made. The baseline date for this policy is also 1st April 2015.</p>
<p>Policy SP4 Land protected for Gypsy and Traveller sites (formerly DM41)</p>	<p>Under the Pre-Submission Main Modifications to policy CS11 of the Core Strategy Review, the appropriate content of this policy has been moved to policy CS11. Therefore SP4 would be deleted from the Site Allocations Plan.</p>
<p>Policy SP5 Land allocated for employment use (formerly DM42)</p>	<p>This policy allocates sites for 100% employment use (in use classes B1 Business, B2 General Industrial or B8 Storage and Distribution) or part employment use as part of mixed use schemes. There are nine sites allocated for 100% employment use (42ha) and eleven sites allocated for mixed use (7.13ha). Core Strategy review policy CS13 encourages the provision of 'approximately 12,500 jobs in the Borough' to 2031, based on evidence from the East of England Forecasting Model 2012-2014. This will be done through a range of actions, including clause a. of policy CS13 which commits to allocating at least 30ha of land for employment development in Use Classes B1 business, B2 general industry and B8 storage and distribution. The land allocated through Site Allocations policy SP5 meets this requirement.</p>
<p>Policy SP6 Land allocated and protected as open space (formerly DM43)</p>	<p>The policy identifies existing open spaces as identified through the policies map and protects them from inappropriate development through Core Strategy review policy DM28. It allocates new sites for public open space at IP083 Banks of the river upriver from Princes Street and part of IP047 Land at Commercial Road (formerly IP263 West of Bridge Street north of the river Orwell). It also lists those sites allocated for development where a higher proportion of on-site open space provision will be required than usually required through Core Strategy review policy DM29.</p>
<p>Policy SP7 Land allocated for leisure uses or community</p>	<p>This policy allocates land for leisure or community uses which are specified site by site. The uses</p>

facilities (formerly DM44)	include a health centre, a primary school and a sports park comprising a cycle track.
Policy SP8 Orwell Country Park Extension (new policy)	This policy allocates land at site IP149 Pond Hall Carr and Farm as an extension to Orwell Country Park, with a possible future visitor centre. The proposals are subject to assessment of their impacts on the Orwell Estuary Special Protection Area and feasibility investigations. A visitor survey was undertaken during March 2015 to assess potential impacts on the Special Protection Area resulting from the country park extension. It concluded that it would not have significant effects on the Special Protection Area. Further work would need to be undertaken to assess the effects of a visitor centre.
Policy SP9 Safeguarding land for transport infrastructure (formerly DM45)	This policy safeguards the currently disused park and ride site at Bury Road, Ipswich for future park and ride use and identifies those sites allocated for development where special provision will need to be made for transport infrastructure. This may include pedestrian and cycle bridges, vehicular bridges or link roads.
Chapter 5 IP-One Area	
Policy SP10 Retail Site Allocation (formerly DM49)	This policy allocates site IP040 Land at Westgate for A1 retail-led mixed use development. Core Strategy review policy CS14 identifies the need to allocate land within the Central Shopping Area to deliver 'in the region of 15,000 sq m net of additional floorspace' for retail development. Site Allocations policy SP10 meets this requirement.
Policy SP11 The Waterfront (formerly DM52)	This policy defines the Waterfront area as a focus for continued regeneration and sets out the vision for mixed use neighbourhoods and developments within the area. It lists the land uses that would be acceptable in the Waterfront: residential, community, office, arts, culture, open space, boat related uses and tourism. On the northern quays, town centre uses except retail uses are permitted.
Policy SP12 Education Quarter (formerly DM53)	This policy defines the Education Quarter and lists the land uses that would be acceptable within it: education and ancillary uses such as student accommodation or offices. Where the Education Quarter overlaps with the Waterfront, the Council will

	consider Waterfront uses on their merits. The policy also identifies the requirement for development at IP049 No 8 Shed Orwell Quay to include public car parking.
Policy SP13 Ipswich Village (new policy)	This policy was not included at consultation draft stage October 2013 but has been introduced now as a context for site allocations which fall within the Village. It defines the Ipswich Village area and sets out the Council's vision for a mixed use neighbourhood of residential uses, open spaces and main town centre uses excluding retail, where they accord with Core Strategy review policy DM22.
Policy SP14 Arts, Culture and Tourism (formerly DM54)	This policy protects existing facilities providing arts, cultural and tourism facilities and sets out criteria for the consideration of alternative uses. It also supports new facilities within the Waterfront or town centre and indicates that, outside these areas, applications would need to accord with Core Strategy review policy DM22. Finally it supports the aspiration to create a purpose-built, multi-purpose space on the Waterfront capable of providing flexible conference and exhibition space.
Policy SP15 Improving pedestrian and cycle routes (formerly DM55)	This policy sets out the Council's support for improvements to pedestrian and cycle routes within IP-One and linking the town centre to residential areas and beyond. It lists eight specific improvements which the Council will seek opportunities to deliver. These include safe cycle and pedestrian access across the lock gates at the entrance to the Wet Dock and improved pedestrian and cycle routes linking St Matthew's church through to the cultural hub at the High Street.
Policy SP16 Transport Proposals in IP-One (formerly DM 56)	This policy sets out the Council's support for the delivery of a Wet Dock Crossing linking the east bank in the vicinity of Toller Road with the West Bank in the vicinity of Mather Way, maintaining navigation through the lock and along the New Cut. It requires development of the Island site to not prejudice the future provision of such a route if a firm proposal is included in the Local Transport Plan. The policy also supports measures to improve pedestrian and cycle access between the Waterfront and Central Shopping Area.

<p>Policy SP17 Town Centre Car Parking (formerly DM57)</p>	<p>This policy sets out the Council's aim to support the town centre economy and support Travel Ipswich through its parking policy. It defines the Central Car Parking Core where Core Strategy review policy DM18 applies, and allocates sites for short stay parking at: IP055 Crown Street and IP048 Mint Quarter. It also requires some public car parking at site IP049 No 8 Shed and indicates that development at IP054 Turret Lane could also include public short stay parking.</p> <p>For long stay public car parking, the policy allocates IP015 West End Road to replace the surface parking currently there and that at Portman Road in addition, if the latter is not replaced within the Portman Road redevelopment.</p> <p>Finally the policy controls temporary short stay parking provision.</p>
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72. Part C of the Plan, IP-One Opportunity Areas, contains one chapter. Chapter 6, IP-One Opportunity Areas, defines six areas within IP-One where there are clusters of development opportunities, which together present an important opportunity to enhance the townscape and public realm. For each area information is provided which will act as a concept plan to guide the development expected within the area. An overview of the Opportunity Area proposals is provided in table 4 below.

Table 4 IP-One Opportunity Areas

IP-One Opportunity Area	Overview of area and content
A Island Site	This sets out urban design site analysis and development options plans for the Island Site, which includes some of the Over Stoke Waterside area on the west bank. Development opportunities and development principles for the area are set out, including: marine related industry including boat building, retention, refurbishment and conversion of historic structures and protection of key vistas across the Island.

IP-One Opportunity Area	Overview of area and content
B Merchant Quarter	This sets out urban design site analysis and development options plans for the Merchant Quarter, which is an area stretching from the northern quays northwards across the Star Lane gyratory to the Old Cattle Market Bus Station and Lower Orwell Street. Development opportunities and development principles for the area are set out, including: mixed use development, layout to relate to historic street pattern and fine grain development of generally low rise (3 storeys) with increased scale at focal points.
C Mint Quarter and surrounding area	This sets out urban design site analysis and development options plans for the Mint Quarter and surrounding area, which includes land between Upper Brook Street in the west and Bond Street in the east and stretches northwards to include the Regent and former Odeon. Development opportunities and development principles for the area are set out, including: predominantly non-retail mixed use development, enhanced pedestrian permeability and enhanced linkage to the Regent Theatre.
D Education Quarter and surrounding area	This sets out urban design site analysis and development options plans for the Education Quarter on the eastern edge of the town centre and parts of the eastern quays. Development opportunities and development principles for the area are set out, including: academic facilities and student accommodation, enhanced pedestrian and cycle permeability through the area and scale, mass and form of development on the Waterfront to be of varied height responding to the Waterfront setting and maintaining glimpse views through to the tree-lined skyline.
E Westgate	This sets out urban design site analysis and development options plans for Westgate, which includes land in the vicinity of the Civic Drive and former Civic Centre site. Development opportunities and development principles for the area are set out, including: retail-led mixed use, creation of new urban space at Westgate St and enhanced public realm in Elm St.
F River Corridor and Princes Street Corridor	This sets out urban design site analysis and development options plans for the river corridor between Stoke Bridge and Constantine Road and Princes Street corridor from the railway station to Civic Drive. Development opportunities and development principles for the area are set out, including: office-led mixed use development, creation of new townscape east of Portman Road with well-defined blocks and through routes and improved public realm in front of the railway station.

73. Part D, Implementation, Targets, Monitoring and Review, contains one chapter of the same name (Chapter 7). It cross refers to the relevant sections of the Core Strategy review which address these elements of the Ipswich Local Plan (Chapters 10 and 11).
74. The site allocations proposed through the Site Allocations Plan together make an important contribution to the continued urban regeneration of central Ipswich, through allocating sites for predominantly mixed uses including homes, offices, shops, leisure uses, community facilities, open spaces and transport infrastructure. The Council considers the site allocations included in the plan are available, viable and deliverable over the plan period to 2031.

Maps and plans

75. There are two Ipswich Proposed Submission policies maps which accompany the Site Allocations Plan and the Core Strategy review: the Local Plan Policies Map November 2014 and Local Plan Policies Map IP-One Area Inset November 2014. The maps illustrate on an Ordnance Survey base the relevant policies and proposals in the outer areas of the Borough and within the IP-One area respectively. The maps have been updated as necessary at September 2015 to reflect the Pre-Submission Main Modifications.
76. Appendix 3 to the Site Allocations Plan also includes an illustrative site sheet for each site allocated for development through the plan (excluding those which currently have planning permission). It provides background on the Preferred Options proposals 2007, the Consultation Draft proposals 2013 and the current use, and includes information on any constraints affecting the site such as access or environmental and heritage constraints, which would need to be taken into account through its development. Site sheets have been published for site allocations added to policies SP2, SP5 and SP6 as a result of the Pre-Submission Main Modifications.

Conclusion

77. The Proposed Submission Site Allocations Plan builds on previous rounds of consultation, initially on two draft plans - the Site Allocations and Policies development plan document and the IP-One Area Action Plan - and latterly on a single consultation draft Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document published in October 2013. The Proposed Submission Site Allocations Plan takes into account changes in the planning policy context, land availability, changes in the evidence base and feedback from consultations in proposing sites for allocation for development and defining areas for protection from inappropriate development.
78. The Site Allocations Plan takes account of and complements policies in the Core Strategy review and assists in the delivery of key Core Strategy review policies, which identify the scale and distribution of development required across the Borough.