

Ipswich Borough Council Local Plan

Examination of Core Strategy and Policies Development Plan Document Review and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document

Stage 2 Matters and Questions - Response to Matter 7 Town Centre/Retail policies and Allocations

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Matter 7– Town Centre/Retail policies and Allocations (Policies CS14, DM20, DM21, DM22, DM23, SP10, SP11, SP12, SP13 and SP14)

7.1 Are the policies (listed above) and site allocations in connection with retail and town centre development soundly-based? If you contend that they are not how should they be modified?

Consistent with National Policy

1. National planning policies for retail and town centres are set out principally in paragraphs 23 – 37 of the National Planning Policy Framework (NPPF). Pages 9 – 11 of the Council’s Soundness Self-Assessment Checklist¹ explain how the Council’s retail and town centre policies are consistent with the policies of the NPPF.
2. Policies SP11, SP13 and SP14 are not specifically referred to in the Soundness Self-Assessment Checklist. Together they promote the focus for main town centre uses in the town centre, reflecting the policies of the NPPF. For clarity, policy SP12 relates to the Education Quarter which is outside of the proposed town centre boundary, but is well connected to the town centre and its further development is likely to support the objectives for the town centre as reflected in paragraph 5.23 of the Site Allocations plan.

Positively Prepared

3. Policies CS14 and SP10 together seek to meet the requirements for retail as identified through the 2010 Retail and Commercial Leisure Study and the Appraisal of Ipswich Town Centre Opportunity Areas, as explained in the Retail and Town Centre Topic Paper².
4. The 2013 Appraisal of Ipswich Town Centre Opportunity Areas report identified the increasing importance of leisure and A3 uses within town centres. In reflection of this, policy DM20 has been revised through the Core Strategy review to provide a more flexible approach to the mix of uses that would be supported in the Central Shopping Area as detailed in paragraphs 44 – 47 of the Retail and Town Centre Topic Paper. Policy DM21 relating to the District and Local Centres has also been amended to provide a greater degree of flexibility in the mix of uses supported. The Council is also reviewing its approach to identifying what constitutes a frontage within the Identified Frontages (Central Shopping Area and District and Local Centres) Supplementary Planning Document, for which a call for ideas consultation was held in early 2016.
5. The Council has also signed up to the vision for Ipswich published by Ipswich Central, the Business Improvement District company, as detailed in paragraphs 57 – 58 of the Retail and Town Centre Topic Paper and revised in July 2015³.
6. Policies SP11, SP12 and SP13 set out a planning approach to three distinct regeneration areas identified within the IP-One boundary: the Waterfront, the Education Quarter and Ipswich Village. These correspond broadly with the Waterfront Quarter, Innovation Quarter and Franciscan Quarter and Portman Quarter identified through the Ipswich Vision. The approach is to encourage mixed use regeneration, with a different mix or balance of uses within each area. These policies support a key element of the Council’s vision and spatial strategy, as expressed through policies CS2 and CS3 and

¹ Ipswich Borough Council, 2015, *Soundness Self-Assessment Checklist*, CDL reference SUCD23

² Ipswich Borough Council, October 2015, *Topic Paper – Retail and Town Centres*, CDL reference LPCD44

³ Various, 2015, *Turning our Town Around*, CDL reference ICD79

described in paragraph 6.10 of the Core Strategy Review. This is to continue the focus of previous local plans on sustainable urban regeneration within central Ipswich.

Justified

7. The justification for the retail policies is set out in the Retail and Town Centre Topic Paper. The Council is currently working with developers to produce a masterplan for the Westgate site, demonstrating that there is commercial interest in bringing the site forward in line with policy SP10. The Council is working with developers to produce options for a masterplan for the site based upon the proposed allocation.
8. The DTZ report identified a number of high street names who at the time were looking for retail floorspace in Ipswich and also identified that one of the major reasons for vacant units in the town is the configuration and size of existing units which do not meet modern retailer needs. The DTZ report highlighted that Ipswich lacks representation of leisure and A3 uses, and that the existing shopping centres lack profile and visibility. The current development at the Buttermarket Shopping Centre will see the creation of a cinema and an increased amount of A3 uses in the centre, along with a loss of retail space. Complementing this, the Westgate site provides an opportunity to deliver modern and prominent retail floorspace, focussed around the existing leisure use of the New Wolsey Theatre, helping to further address the issues identified by the DTZ report.
9. The strategy for focusing retail floorspace in the town centre is consistent with the Council's wider approach of attracting people into the town centre, for example through its introduction of £1 parking after 3pm in Council car parks.
10. The Council continues to receive applications for out of town retail and main town centre use developments and therefore policies DM22 and DM23 continue to be required to support the town centre first principle. The most recent Central Shopping Area – Identified Frontages survey⁴ demonstrates that the percentage of vacant units within the Central Shopping Area remains higher than the national average and therefore that potential impacts from out of centre development should be resisted. The receipt of applications for floorspace out of town would indicate that demand for floorspace in the catchment exists.
11. The Core Strategy Sustainability Appraisal report⁵ explains how alternatives to CS14 and DM20 – DM23 were considered as part of the production of the adopted Core Strategy and Policies development plan document. The Site Allocations Sustainability Report explains how alternatives to policies SP10 – SP14 were considered. The Preferred Options Sustainability Report⁶ considered alternative approaches under Policy Area 48 (now SP14), Policy Area 59 (now SP11) and Policy Area 60 (now SP10). Alternative uses for the Westgate site, allocated for retail-led mixed-use development through SP10, were considered in the Site Allocations Sustainability Appraisal as set out in Appendix D of the report. This concluded that the retail-led allocation would best contribute to supporting the vitality and viability of the centre.
12. The approach to the Waterfront (SP11) continues the 1997 Ipswich Local Plan⁷ approach to high density, mixed use development within the 'Wet Dock', to create a vibrant residential neighbourhood, and work and leisure destination. It is centred on the

⁴ Ipswich Borough Council, 2015, *Central Shopping Area – Identified Frontages Survey*, CDL reference ICD20a

⁵ Arcadis, 2015, *Strategic Environmental Assessment and Sustainability Appraisal – Core Strategy and Policies DPD Review*, CDL reference SUCD09 (sections 4.3.4 and 4.4.5)

⁶ Suffolk County Council, 2007, *Sustainability Appraisal – Preferred Options*, CDL reference LPCD09

⁷ IBC, 1997, *Ipswich Local Plan*, CDL reference LPCD01

Wet Dock which was created in 1842 but fell out of regular commercial use at the end of the 20th Century.

13. Whilst much development has already taken place, the area's transformation is ongoing. Some key site redevelopment opportunities remain, including the Island Site IP037, which now has Enterprise Zone status on part, and sites at the west end of the Northern Quays. The completion of the flood defences, expected in 2017, will facilitate the redevelopment of sites.
14. The mix of uses permitted by the policy is considered appropriate and NPPF compliant. Along the Northern Quays, the Waterfront overlaps the defined town centre. The Cliff Brewery site at the south-eastern tip of the Waterfront is about 500m from the town centre boundary. The Upper Orwell Crossings or other links through the Island Site will facilitate access from the eastern quays to the station. The entire Waterfront is therefore considered to represent a sustainable and accessible central location within the Borough.
15. The approach to the Education Quarter is based largely upon discussions with Suffolk New College and University Campus Suffolk (UCS). Policy SP12 incorporates a degree of flexibility to accommodate future changes in the organisations' development plans, and the extent of the Education Quarter reflects the UCS land interests as identified in the Estates Masterplan⁸.
16. The Ipswich Village (SP13) was identified as a character area through the IP-One Area Action Plan⁹ work carried out in 2003. In Ipswich Village it identified potential for the creation of a mixed use, sustainable urban area, including conference facilities, commercial leisure, sports and hotel facilities and improved links to the town centre and Waterfront. The area stretches from the established residential areas beyond Handford Road in the north, to Ranelagh Road and the railway station in the south. It includes Alderman Road Recreation Ground and the football stadium of Ipswich Town Football Club at Portman Road.
17. Some development has taken place within Ipswich Village, including the Crown Court, offices occupied by the Borough and County Councils, and a hotel, homes, live/work units and small scale retail on the former Compair Reavell site south of the river. However, some development opportunities remain, including residential sites (IP096 and IP006), mixed use sites (IP004 and IP015) and office or office-led sites (IP094 and IP051). There are further sites which could come forward as windfall sites, particularly along West End Road, and therefore the policy will provide a guide to appropriate uses.
18. Policy SP14 aims to protect existing arts, cultural and tourism facilities and to focus new such development into the town centre and Waterfront. These are suitable, accessible locations for facilities which may serve residents and visitors alike and help to ensure social and cultural well-being.

Effective

19. Policies CS14 and DM20 – DM23 have proved to be effective in restricting the amount of retail and main town centre uses permitted in out of centre locations. The 2014/15 Authority Monitoring Report shows that within the monitoring period policy DM22 was used 4 times and DM23 was used 6 times.

⁸ University Campus Suffolk, 2011, *Estates Masterplan*, CDL reference ICD51

⁹ GVA Grimley & Urban Initiatives, 2003, *IP-One Area Action Plan*, CDL reference ICD32

20. The policies SP11, 12 and 13 are new, but essentially continue an existing approach to development in the three areas, which has proved successful to date in regenerating these important areas of inner Ipswich.
21. Policy SP14 is new, but builds on the approach to community facilities set out in policy DM32 and reflects the guidance in the NPPF (e.g. paragraph 70).

Modifications

22. DM21 - it is considered that the flexibility for district and local centres could be further widened to support the provision of D1 uses where these are appropriate to a district or local centre. Some D1 uses, such as children's nurseries and dentists, which serve a local area should be supported under clause b and it is proposed to modify this to state '...from A1 to A2-A5, betting shops and payday loan shops and D1 uses and sui generis uses appropriate to a centre...'. This would better reflect the mix of uses currently provided by district and local centres, as evidenced by the District and Local Centres survey¹⁰.
23. Subject to these modifications, the Council considers these policies are soundly based.

¹⁰ Ipswich borough Council, 2015, *District and Local Centres Survey*, CDL reference ICD19a