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Mr. Russell Williams
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Our Ref: PINS/R3515/429/3

Date: 17th November 2011

Dear Mr Williams

Ipswich Borough Council Core Strategy & Policies Development Plan Document

As you know I was appointed by the Secretary of State to carry out an independent examination of the Ipswich Borough Council Core Strategy & Policies Development Plan Document, which was submitted on 25 March 2010, pursuant to section 20 of the Planning and Compulsory Purchase Act 2004 (the 2004 Act).

I conducted the Examination by way of written exchanges and Hearings that were held on 10-11 May 2011, 12-14 July 2011 and 19-21 July 2011.

This report contains my recommendation that the submitted DPD is sound and should be adopted, subject to a number of changes that were put forward by your Council as a result of discussions and correspondence that took place between representors, consultees and myself. In coming to my conclusions on the soundness of the DPD I have had regard to the representations that were made following its publication in accordance with regulation 27 of the 2008 regulations, along with subsequent written submissions and oral contributions made at the Hearings.

I would like to thank the Council's officers for the very helpful and professional way in which they prepared for and conducted the Examination. I would also like to record my thanks to Annette Feeney, the Programme Officer. Her organisational skills, efficiency and friendly manner helped to ensure that the Examination ran smoothly.

Yours sincerely,

Frances Mahoney

INSPECTOR



INVESTOR IN PEOPLE





Report to Ipswich Borough Council

by Frances Mahoney DipTP MRTPI IHBC

**an Inspector appointed by the Secretary of State for Communities and
Local Government**

Date: 17th November 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004
SECTION 20

REPORT ON THE EXAMINATION INTO THE IPSWICH BOROUGH COUNCIL CORE STRATEGY & POLICIES DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 26 March 2010

Examination hearings held on 10-11 May 2011, 12-14 July 2011 and 19-21 July 2011

File Ref: PINS/R3515/429/3

Abbreviations Used in this Report

AA	Appropriate Assessment
AH	Affordable Housing
AHSVS	Affordable Housing Site Viability Study
AMR	Annual Monitoring Report
CD	Core Document
CS	Core Strategy
CSA	Central Shopping Area
DPD	Development Plan Document
EA	Environment Agency
ELR	Employment Land Review
FPC	Further Proposed Change
GTAA	Gypsy & Travellers Accommodation Assessment
IBC	Ipswich Borough Council
IPA	Ipswich Policy Area
LDF	Local Development Framework
LDS	Local Development Scheme
LP	Local Plan
NPPF	National Planning Policy Framework
NF	Ipswich Northern Fringe
PC	Proposed Change
PDL	Previously Developed Land
PPS	Planning Policy Statement
RS	Regional Strategy (East of England Plan)
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document

Non-Technical Summary

This report concludes that the Ipswich Borough Council Core Strategy & Policies Development Plan Document provides an appropriate basis for the planning of the Borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- adjust the housing provision in accordance with the Council’s latest local evidence;
- change the at least 70% target for development on previously developed land to at least 60%;
- retain the priority for residential development to be given to previously developed land within the Ipswich IP-One area, whilst introducing a mechanism to bring forward greenfield development, should circumstances of unsatisfactory delivery prevail;
- work on the supplementary planning document in relation to the Northern Fringe will start as soon as the Core Strategy is adopted;
- include appropriate references to testing for economic viability in relation to the provision of affordable housing;
- reducing to 35%, the target for affordable housing on large development sites;
- align the approach to Gypsies, Travellers and Travelling Showpeople with national and regional policy;
- highlight the emphasis on cross-boundary working, particularly in respect of achieving targets for jobs and Gypsy and Traveller provision;
- add flexibility in respect of viability testing in relation to the provision of public art;
- amend low density residential development to remove the minimum requirement, with an average taken as 35 dwellings per hectare; and
- identify the review of the Core Strategy as being 2012/2013.

All of the changes recommended in this report are based on proposals put forward by the Council in response to points raised before the public Hearings and suggestions discussed during the public Examination. The changes do not alter the thrust of the Council’s overall strategy.

Introduction

1. This report contains my assessment of the Ipswich Borough Council Core Strategy (CS) & Policies Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 *Local Spatial Planning* (paragraphs 4.51- 4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the Examination is the assumption that the Ipswich Borough Council (IBC) has submitted what it considers to be a sound plan. The basis for the Examination is the submitted CS (March 2010) which is the same as the document published for consultation in September 2009.
3. However, the IBC proffered a number of changes to the CS just prior to its submission and over the course of the Examination. Some were as a result of discussions and agreement with representors before and during the Examination process. Some are minor in nature being factual updates, corrections of minor errors or other text amendments in the interests of clarity (PCs) (set out in Appendix B to this report). As these minor changes do not relate to soundness, they are generally not referred to in this report, although the Council’s view that they improve the plan is endorsed. I am also content for the Council to make any additional minor changes to page, figure and/or paragraph numbering and to correct any remaining grammatical and/or spelling errors prior to adoption.
4. Some of the changes are more substantive in their nature and are needed to make the DPD sound. These changes (FPCs) were the subject of consultation which took place both prior to the commencement of the Examination Hearings (November 2010 to January 2011) and as a result of the outcomes of the Hearing sessions themselves (May to June 2011 & August to September 2011). The FPCs are set out at Appendix A. These changes were published on the web-site and notified direct to all representors. In some cases the changes were of a level of significance which warranted public consultation and, where necessary, an updated Sustainability Appraisal (SA). This report deals with these changes, all of which have been promoted by IBC. The consultation responses have been taken into account in writing this report.
5. Where the Council’s change is endorsed within the report, it will be referred to by the relevant emboldened **PC/FPC** number, but no further formal recommendation is required as the final paragraph of the report will recommend all relevant changes in the appendices.
6. However, none of the changes in the Appendices materially alter the substance of the plan or its strategic vision and objectives, or undermine the outcome of the relevant SA, including subsequent updates, the Appropriate Assessment (AA) or the participatory processes undertaken.
7. The Government intends to abolish regional strategies through the Localism Bill. However, the Court of Appeal judgement made on 27 May 2011 states that it would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to

the proposal to abolish regional strategies. The judgement goes on to confirm that, for so long as the regional strategies continue to exist, any development plan documents must be in general conformity with the relevant regional strategy.

8. The IBC did proffer a number of FPCs and PCs which included amendments to the CS that reflected the Secretary of State’s revocation of the Regional Strategy (July 2010), that being the *East of England Plan* (RS) (May 2008). Ongoing work upon the RS review effectively ceased soon afterwards. That Ministerial decision was subsequently quashed by the High Court (November 2010). However, this was immediately followed by a written Ministerial Statement, a letter from the Chief Planner with an attached clause from the proposed Localism Bill, and a Department of Communities and Local Government media statement, all of which were the subject of a further challenge on the grounds that they were not capable of being a material consideration and hence, not to be considered by decision makers.
9. On 7 February 2011 the Court found that the statement and letter, and hence the intention to repeal the legislative provision for regional strategies, were capable of being a material consideration. The weight to be attached to it was a matter for the decision maker. This position was tested before the Court of Appeal and its judgment was published on 27 May 2011. It critically distinguishes between development control and the preparation of development plans. For the latter, and of vital importance in the status of the RS and the Examination of the CS, paragraph 24 of the judgment states that *it would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to the proposal to abolish regional strategies. For so long as the regional strategies continue to exist, any development plan documents must be in general conformity with the relevant regional strategy.* The RS thus remains part of the statutory development plan against which the CS must be tested.
10. As a result, the IBC negated a number of the initially promoted changes by re-introducing some of the references to the RS. In this regard, where the text would return to that set out in the submission CS document, no reference has been made to such changes within the schedules at Appendix A and B.
11. On 9 June 2010 the Government announced the re-issue of PPS3: *Housing* with amendments excluding gardens from the definition of previously developed land (PDL) and deleting the national indicative minimum density for housing. In addition, on 23 March 2011 a Ministerial Statement on ‘Planning for Growth’ was issued with further details contained in the Treasury’s document “The Plan for Growth”. Among other things, this requires Local Planning Authorities to press ahead with preparing up-to-date development plans; to adopt a strong presumption in favour of sustainable development; to support economic recovery; and to attach significant weight to the need to secure economic growth and employment. As part of the Examination, comments from all parties were sought on these matters and their implications were also considered at Hearing sessions in relation to the appropriate main issues. The responses have been taken into account, in my consideration of the soundness of the document.

12. The Government published a consultation draft National Planning Policy Framework (NPPF) in July 2011. The objective of the NPPF is to streamline national planning policy into a consolidated set of priorities to consider when planning for, and deciding on, new development. Whilst the draft NPPF is still emerging Government policy, the Courts have made it perfectly clear that where the intention of the Government is material, the weight to be given to it is a matter for the decision maker in the light of all the relevant circumstances.
13. The draft NPPF was published just after the last hearing session of the CS Examination had been completed. In these circumstances it was considered politic and, in the spirit of natural justice, to invite comments in relation to the implications of this policy development for the CS Examination. Such an invitation was published on the CS website and sent to representors. I have taken into account that the NPPF has the status of draft policy, still susceptible to change, and so carries little weight at this stage. I have considered it accordingly, along with the submitted representations in preparing this Report.

Assessment of Soundness

Overview

14. The Ipswich Borough Council Core Strategy & Policies Development Plan Document is, as the name implies, a high-level strategic plan. When adopted, the CS will form the key component of the Council’s Local Development Framework (LDF) to be accompanied by subsequent DPDs and Supplementary Planning Documents (SPD). Grounded in the RS, it aims to deliver a sustainable pattern of development and to meet the development needs of the Borough over the next 15 years (to 2027), as required by PPS12.
15. The CS is supported by an extensive evidence base, only a few items of which are referred to in this report (Core Documents (CD no)). Alongside the necessary gathering of factual information, the Council’s approach has been grounded in community engagement, and in working in partnership with key delivery agencies.
16. Ipswich performs a regional role in delivering growth and performing as a major employment, shopping and service centre, and a focus for transportation. However, the Ipswich Borough has a tightly confined administrative area which does not extend to the whole of the urban area of Ipswich.
17. Some decisive areas, facilities and infrastructure, particularly relevant to the provision of employment opportunities as well as Gypsy and Traveller accommodation, lie just beyond the boundaries of IBC. This sets up a challenge that to deliver the aims and objectives of the CS, cross-boundary working with neighbouring Councils is an essential prerequisite. The Suffolk Haven Gateway Partnership, the Ipswich Policy Area (IPA) and the Suffolk County Council Forum for Gypsy and Traveller Accommodation sub-group are identified as providing for co-ordination and consistency of approach between neighbouring authorities.

18. This sense of collaborative partnership is expressed through the *Statement of Intent* (CD ECD16) dated 31 May 2011 and endorsed by the following signatory authorities; IBC; Babergh District Council; Mid Suffolk District Council; and Suffolk Coastal District Council. It expresses their position on joint working on planning matters, both historically and into the future.
19. Taking into account the following factors;
- long established policy partnership evident in the associative working of IBC and its neighbouring Councils;
 - the acknowledgement within RS policy of some element of inter-dependence;
 - Government’s identification of cross-boundary working as an important tool in the future of national sustainable economic growth; and
 - the early date for a CS review (2012/2013) (**PC10, PC223**),

I am reassured that mechanisms are in place to secure the collaborative and effective cross-boundary working to fulfil the vision and objectives of the CS, whilst maintaining consistency with national and regional policy.

Main Issues

20. Taking account of all the representations, written evidence and the discussions that took place at the Examination Hearings, 11 main issues upon which the soundness of the plan depends have been identified. The order that these issues are set out in this report, does not necessarily reflect the order in which they were dealt with within the programme of the Examination Hearings.

Spatial Strategy

Whether the overall spatial strategy is soundly based, presenting a clear spatial vision for the Borough, appropriate to the needs of the area, in accordance with national and regional policies.

21. Ipswich is regionally acknowledged as a key growth location and a key centre for development and change (RS Policy SS3). In response, the general thrust of the Spatial Strategy is to deliver sustainable growth, focusing employment, housing and other new development in central Ipswich, “IP-One” area, and within and adjacent to identified district centres. Urban regeneration and the re-use of PDL are also fundamental elements of the jobs-led Core Strategy. Possible limitations on the scale and speed of growth have been identified in **FPC1**.
22. The emphasis for development is firmly placed upon PDL as the initial source in respect of fulfilling the specified housing and employment targets. In the case of housing, over half of the supply identified within the *Strategic Housing Land Availability Assessment* (SHLAA) is PDL (**PC62**). Essentially most of the Borough’s land supply for employment development is PDL.

23. Adding substance to the emphasis on PDL as a starting point in the strategy for housing and jobs delivery, CS Policy CS9 embodies an “at least” 70% target of development on PDL. However, the Borough is tightly constrained, in terms of prospective land supply, mainly by sensitive land designations, flood risk issues and administrative boundaries. Consequently, there is not a reasonable prospect of general compliance with the growth requirements of the RS with such an over reliance on PDL within the urban area of the Town. Therefore, due to the uncertainty in bringing mainly town centre sites forward and the resultant impact on the success of this long term strategy, the Council’s change **FPC11** adjusts the “at least” target to 60%, reflecting RS Policy SS2 in this regard.
24. In examining alternative strategies, consideration was given to overcoming the spatial and administrative impediments to the growth of sustainable economic development. To equip the spatial strategy to address housing delivery, in conjunction with PDL, over the plan period, there is recognition as a realistic option of an urban extension to the north of the town to offer flexibility within the strategy. Initially this was to constitute phased development in the mid to latter phases of the plan period. However, the matter of the timing of this development will be returned to later in the report. This combination approach to housing provision presents as being the only rational option in the circumstances when considered against a “do nothing” scenario (CD ICD03) alongside the Government’s “Plan for Growth” agenda. Both the urban expansion and development on PDL are identified vehicles of growth within the town comprising important elements for the success of the spatial strategy over the whole of the plan period.
25. In conclusion, the CS has a clear spatial vision based upon the Borough’s *Community Strategy – Everybody Matters* (CD ICD13), national and regional guidance, and an evidence-based assessment of the Borough’s needs and situation both now and throughout the plan period. It is from this vision that the Spatial Strategy springs. It identifies the spatial development of the Borough and its strategic priorities providing a sound basis for the overall CS, the purpose of which is to instigate an urban regeneration of the Town. It appropriately reflects the general thrust of the overarching aims of both current and emerging national planning policy along with that embedded within the RS.

The Local Economy

Whether the Core Strategy would help to sustain and strengthen the local economy and whether the approach is soundly based and deliverable.

26. The RS identifies an indicative target for net growth in jobs within all employment sectors, for the period 2001-2021 of 30,000 within the Suffolk Haven Gateway, that being IBC, Suffolk Coastal District Council and Babergh District Council (RS Policy E1). This indicative RS target has been closely aligned with the RS housing target to create a sense of synergy in terms of supporting balanced, sustainable communities.
27. However, the CS scales down this indicative target at a local level, to a figure of “at least” 18,000 jobs within the IPA (CS Policy CS13). This figure originates from an earlier draft of the RS (CD PCD81) which apportioned a

split of the overall sub-regional target. Doubt, centred on the robust nature of the evidence base at the time that the RS was considered, instigated the shift to the indicative target. Nonetheless, the Council recognised a cogent sense of parity between the localised interpretation of the RS indicative target and their own conclusions based on localised evidence (CDs ACD04, SCD18 & SCD21).

28. In addition, significant peripheral areas of employment land within the urban area of Ipswich, but just outside its administrative boundaries, prompted the adoption of the IPA as the justifiably pertinent area for employment provision. This is an appropriate approach, taking into account the confined nature of the Borough, and the mutual interdependence of the Town and its immediate surrounding area both in terms of providing services and facilities, as well as an important sub-regional centre for employment.
29. Being mindful of the thrust of the Government’s policy statement on “Planning for Growth”, which emphasises the need to make adequate provision for sustainable economic growth and jobs, delivering the jobs required to meet the identified employment target relies on, amongst other things, having the identified sites available for employment growth and creating the right conditions for demand in the economy to grow.
30. Over the course of the Examination, based on the outcomes of the *Employment Land Review (ELR)* (CD ACD04), the *East of England Forecasting Model* (CDs PCD11, PCD38 & PCD39), and on identified trends, some doubt had arisen as to the prognosis for compliance with the employment targets indicated within both the RS and the CS. Consequently, following a period of consultation, a study based on land potentially available within the Borough boundaries was introduced to the Examination (Topic Paper dated 10 May 2011). It estimated site-based job capacity figures, which included non-B Class jobs. The resultant capacity estimates, suggest that Ipswich Borough has a theoretical capacity to deliver in excess of 20,000 jobs during the plan period. This intimates that the jobs target could be met within the Borough boundaries. However, this is a purely theoretical exercise and there is no certainty as to whether these sites would be available, suitable or desirable. Nonetheless, it is reasonable to suppose that some of the sites are likely to come forward over the plan period.
31. Therefore, in all likelihood, in the longer term, “Planning for Jobs Growth”, as a practical approach, will depend on cross-boundary working with Ipswich’s fellow neighbouring authorities which have identified over 100 hectares of future employment land within the IPA. The Joint *Statement of Intent* on behalf of the neighbouring Councils (CD ECD16) acknowledges that there is an overall responsibility which crosses administrative boundaries to comply with the indicative employment targets set within the RS. The ELR, as a jointly produced evidential document, confirms the joint working approach (CDs ACD04, SCD18 & SCD21).
32. By the nature of the relationship between the Councils, the well-being of each neighbouring authority is closely intertwined with that of Ipswich Borough. This is particularly so in terms of inward and outward migration to work, transport and educational systems and retail and leisure demands. The terms

of the *Statement of Intent* do afford comfort, that there is commitment to supporting the employment strategy over the plan period, to achieve compliance with the RS Suffolk Haven Gateway indicative target.

33. A joint monitoring process, interpreted through the Annual Monitoring Report (AMR), similarly underpins the cross boundary approach. CS Objective 12 also reflects the commitment to joint working primarily through the IPA Board. The proposed review of the CS in 2012/2013 will allow for an early reappraisal of the effectiveness of cross-boundary working.
34. This joint working, along with the following factors, all work in combination to add credence to the conclusion that this is a sound policy to pursue and has a reasonable prospect of achieving the necessary jobs growth to support the overall development and growth of the Borough over the plan period:
 - 30 hectares of land to be allocated through the IP-One Area Action Plan and Site Allocations and Policies Development Plan Documents;
 - the strategic employment site at the former Cranes Factory at Nacton Road (16.7 hectares); and
 - the close connection of local employment sectors with the Ports of Felixstowe and Ipswich, such as transport and distribution.

Retail, Leisure and Cultural Provision

Whether the Core Strategy provides a sound basis for retail, leisure and cultural development and whether it is deliverable.

35. In the interests of vitality and viability, CS Policy CS14 sets out that future retail growth should be directed to the Ipswich Central Shopping Area (CSA), as well as district and local centres. The extension of the CSA is a policy aim to provide at least 35,000 square metres net of additional retail floorspace. The Mint Quarter and Westgate Quarter are identified by the Ipswich Retail Study 2005 (CD ICD40 (updated by 2010 study (PCD69)) as significant town centre opportunities to achieve the identified expansion of the CSA. It will be through the IP-One Area Action Plan that sites for retail development will be allocated. The expansion would strengthen the role of Ipswich as being a regional centre of strategic importance for retail and other town centre purposes (RS Policy E5).
36. CS Policy CS14 is clear that major retail development in out-of-centre locations will be considered against the terms of national policy (PPS4) and the CS aim to enhance the vitality and viability of the CSA. Lower case text (para 8.161), however, presents a contradictory view that there is not a justification for major out-of-centre retailing. To overcome the tension between these aspects of retail development and maintain flexibility within the policy, the Council rightly promoted the deletion of para 8.161 (**FPC31**).
37. CS Policies DC20, 21, 22 and 23 maintain the overall CS and PPS4 approach to retail development to support and enhance existing and future retail needs. The Council’s proposed changes (**PC172 to 187**) provide clarity and flexibility to this development management guidance in respect of where and how retail development will take place across the Borough.

38. In terms of enriching the culture of the Borough, Public Art is identified within the CS as establishing a sense of place and local identity. CS Policy DC7, however, lacks flexibility to take account of the effect of the required contribution in respect of the viability of the overall development. The Council has recognised this shortcoming and **FPC34** introduces the appropriate variable in this regard.
39. In conclusion, taking into account the changes, the plan’s approach to retail, leisure and cultural development is sound.

Location and supply of new homes

Whether the overall level of housing provision and its distribution are justified and appropriate.

40. Policy H1 of the RS requires Ipswich Borough to provide a minimum of 15,400 dwellings or 770 dwellings per year, between 2001 and 2021. However, the CS plans for a lower rate of housing development of 14,000 dwellings or 700 dwellings per year for the same period (18,200 dwellings to 2027) (**FPC2, FPC3, FPC4, FPC5, FPC8, FPC9, FPC10**). The 10% reduction is evidenced by the *Housing Trajectory* (CD PCD18). This identifies a 15 year housing land supply between 2011 and 2026 of 11,065 dwellings (some 737 dwellings per year) with completions for 2010/11 of 336 dwellings. These figures represent a shortfall against the RS requirement. The SHLAA (CD ACD14) reflects this reduced housing capacity. A market movement in favour of family housing, as well as the removal of the minimum density for residential development are both factors which impact on overall residential densities and therefore, lower site capacities (**FPC35**). The higher RS figure would require a greater adjustment, bringing forward in larger numbers development previously reserved for the latter years of the plan, thereby undermining the maintenance of the 15 year land supply over the plan period.
41. In this instance the CS shortfall compared to the RS target is justified by an up-to-date assessment of urban capacity and a changing housing market susceptible to difficult economic conditions. It would not, therefore, undermine the overall RS.
42. The *Housing Trajectory* identifies a five year land supply of 3,597 dwellings between 2011 and 2016. The majority of this land is PDL and mainly concentrated within the IP-One area, a significant percentage of which lies within the flood zone. A lack of surety in relation to some PDL coming forward in the prescribed timeframe does not provide comfort that the identified 5 year land supply is realistic or deliverable. Through the monitoring process, via the AMR and the CS review, should it become apparent that the reliance on PDL for development in the first five years of the plan is a flawed strategy, policy flexibility to meet the specified housing needs would need to be applied. The Council’s **FPC15** would allow, in appropriate and justified circumstances, the release of substantiated amounts of the Northern Fringe (NF) development to underpin the 5 year land supply. This provision brings both flexibility and reliability to the overall housing strategy confirming its soundness. However, a factor in the consideration of the release of NF development would, quite rightly, be the progress of the NF Master Planning.

Ipswich Northern Fringe

Is the Ipswich Northern Fringe, as a major urban expansion, an appropriate strategy and would it provide certainty for the delivery of housing over the plan period?

43. The land immediately to the north of the existing built up area of Ipswich, in the vicinity of Henley Road/Westerfield Road, has previously been identified for around 1500 homes within the *Suffolk Structure Plan* (CD SCD05). CS Policy CS10 develops this historic policy recognition further, by identifying the NF as a broad sustainable location to enable the continuous delivery of housing for at least 15 years. It would represent a major urban extension to the Town.
44. The SHLAA identifies potential housing capacity in the order of 4,500 dwellings on the NF, identified as a broad location both in CS Policy CS10 and on the accompanying Proposals Map (**FPC17**). It is anticipated that of this expected capacity, 1000 dwellings would be commenced prior to 2021. **FPC12** provides clarity in this regard. However, as already identified, there is uncertainty regarding the reliability of PDL being the central resource of land for housing in the early stages of the CS. Therefore, to create greater certainty and flexibility within the CS, **FPC21** (**FPC22**) acknowledges that with the CS being kept under review (**FPC23**) it may be necessary for a maximum of 1500 dwellings to be required at the NF prior to 2021 to maintain a continuous supply of housing land over the whole of the plan period.
45. However, at the Hearings the Council recognised that any early delivery of development on this greenfield site would need to be carefully managed, as lead-in times to such development can be considerable, particularly in respect of infrastructure provision. Therefore, the process of review is critical to determining whether there is a need to accelerate the rate of release of development at the NF. Review mechanisms would include an early review of the CS (**FPC23**).
46. The CS Policy CS10 sets out that the NF would be identified through a subsequent Site Allocations and Policies document. It would be from this document that the NF master planning would spring. However, as part of the Examination Hearings, the Council accepted that to achieve a flexible approach to housing policy, the CS would need to be capable of responding to change identified through review. The specified sequence of planning the NF could undermine flexibility in the housing strategy with the potential to stifle growth within the Borough. The Council’s change **FPC12**, removes the initial necessity for the Site Allocations and Policies document in respect of NF planning. **FPC23** identifies that work on the NF SPD (*Northern Fringe Area Development Brief*) will commence as soon as the CS has been adopted. This will be a comprehensive approach to the master planning of the NF, dealing with the scale, nature and phasing of development to ensure essential infrastructure and facilities, such as a country park, railway crossing, schools, drainage and a district centre (**PC177**) are provided as required (**FPC13**, **FPC14**).

47. CS Policy CS10 and the Proposals Map identifies land to the east of Henley Road and south of the railway line as being expected to commence prior to 2021. This sustainable development site relates well in scale and location to the existing urban settlement pattern of the northern suburbs of Ipswich, with ready access to existing services, public transport routes and the Town Centre. Taking into account the importance of the NF in achieving a timely response should the circumstances of the housing strategy change over the plan period, it is reasonable to identify within policy the expected focus in the early stages of the development of the urban extension. However, it does not preclude other NF sites from coming forward were circumstances emanating from SPD and/or review to so dictate. It provides some clarity and a starting point for the SPD and adds to the effectiveness of the policy approach within the context of the overall housing strategy.
48. Overall, subject to the changes highlighted above, the NF as an integrated supporting policy approach to providing flexibility and security in the provision of a sustainable, responsive housing strategy for the Borough over the plan period is sound.

Affordable Housing

Whether the Core Strategy makes appropriate provision for Affordable Housing (AH).

49. Policy CS12 sets out a tiered approach to the provision of AH centred on an acknowledgement that larger sites can support a greater percentage provision. The Policy identifies the highest tier requirement to be 40% AH provision. The levels of identified housing need within the *Affordable Housing Site Viability Study (AHSVS)* (CD SCD20) would justify an affordable target of at least 40%. However, the set target should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery, including the buoyancy and achievable levels of fiscal value within the local housing market, weighed against the probable availability of public subsidy.
50. Taking into account the ongoing economic conditions and a reassessment of the net annual need for affordable housing set against the advanced number of new dwellings to be built each year, the Council has promoted an adjustment in the top tier percentage figure of the proportion of dwellings that should be affordable on larger sites to 35% (**FPC29**). This change would reflect the regional target set within the RS (Policy H2).
51. In addition, based on the conclusions of the AHSVS, which further tested larger site viability in Ipswich, the target of 35% presents a more realistic and reasonable response, particularly as most sites in Ipswich could not achieve viability without grant, were a higher AH target to be applied. This is a reasonable conclusion to draw and would serve to pragmatically facilitate the delivery of the identified need for AH within the Borough.
52. Site viability considered alongside the provision of AH is a primary policy consideration. Therefore, for clarity Policy CS12 is proposed to be expanded to make reference to the circumstances where viability grounds would be considered (**PC72**). Whilst this text was previously within CS Policy DC25, the

precision of the policy approach is better served by its inclusion within the instigating policy text.

53. Overall, subject to these changes, the policy framework makes appropriate provision for AH consistent with national and regional policy and is sound.

Travelling Community

Whether the Core Strategy has adequately addressed the accommodation needs of the travelling community in accordance with national and regional policy.

54. The adopted Revision to the RS: *Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England* (CD RCD03) identifies a need for a minimum of 58 pitches for Gypsy and Traveller caravans in the Ipswich Borough by 2011 with further provision to 2021 being based on an annual compound 3% increase. CS Policy CS11 and its accompanying text, clearly identifies that any shortfall in pitch numbers in the identified RS provision, and such further need as may be identified through the *Gypsy and Travellers Accommodation Assessment* (GTAA) (CD SCD09), will be found within the IPA. Sites will be allocated through the *Site Allocation and IP-One Area Action Plan Development Plan* documents (**FPC25**). The joint GTAA is currently being updated and is expected to be published towards the end of 2011. The identified need will inform site allocations in subsequent DPDs (**FPC26**).
55. The up-dating of the GTAA also applies to work in respect of the needs of Travelling Showpeople to which the criteria based CS Policy CS11 equally applies (**FPC27**).
56. Due to the confined nature of the Borough and the recognition of a need to co-ordinate provision across the County the delivery of the CS in this regard is dependant on co-operation between IBC, the neighbouring Councils which make up the IPA, the County Council and the Gypsy and Traveller Community (**FPC24, FPC28**). The terms of the Councils’ *Statement of Intent* (CD ECD16), the evidential base data produced as cross boundary assessments (CD SCD09 & PCD80), and the continuing cross-boundary co-operation, does provide sufficient comfort to confirm that, subject to the identified changes being made, the strategy is sound and adequately addresses the accommodation needs of the travelling community in accordance with national and regional policy.

Sustainable Development and the Environment

Whether the Core Strategy makes adequate provision for sustainable development and the protection of the natural environment and other environmental assets.

57. It is clear that the achievement of sustainable development lies at the heart of the vision and objectives of the CS, woven into the whole of the policy framework. This reflects both national and regional priorities in terms of tackling climate change.

58. CS Policy CS1 sets out a comprehensive approach to responding to the challenges of climate change. Policies CS1 and DC2 both require the provision of at least 15% of energy requirements on major developments through decentralised renewable or low carbon energy sources. CS Policy DC1 appropriately moves development forward to achieving the national target of all new homes being zero carbon by 2016 by means of increasing minimum standards of environmental sustainability overtime.
59. It is acknowledged these are challenging standards but these policies allow flexibility for feasibility and viability to be taken into account when considering applications for development and do not place an undue burden on developers.
60. The strategy’s pro-active approach to encouraging sustainable development, is justified and meets the viability tests in paragraph 33 of PPS1 *Planning and Climate Change Supplement*. Further, they are in line with the RS Policies ENG1 and ENG2 which set ambitious targets for the supply of energy from decentralised, renewable and low carbon energy sources so that by 2010 10% of the region’s energy and by 2020 17% of the region’s energy would come from renewable sources.
61. CS Policies CS4, DC10 and DC32 convey the commitment of the Council through the CS to protect and enhance the built, historic, natural and geological assets of the Borough as well as local biodiversity. They recognise the intrinsic value of these assets to local distinctiveness and quality of life.
62. CS Policy DC4 recognises the need to reduce flood risk in Ipswich in accordance with PPS25 *Development and Flood Risk*. This includes planning for the effects of increasing rainfall intensities and sea levels. It is appropriately underpinned by the IBC *Level 2 Strategic Flood Risk Assessments* (CD PCD93).
63. Climate change issues and flood risk are being tackled in a robust way, and there is nothing in the evidence to suggest otherwise.

Transport

Whether the transport priorities are soundly based, taking into account the necessity to reduce the need to travel and to secure more sustainable patterns of transport development (PPS1 Delivery Sustainable Development).

64. Throughout the town there is a generally good transport network available which should be capable of dealing with future development growth (Ipswich Transport Model Assessment, CD ACD10). East-west capacity, identified as the section heading (CS Policy CS20), serves as a confusing “red herring”. This part of the CS deals with key transport proposals throughout the Borough and is appropriately headed by **PC104**.
65. In the interests of clarity, these key proposals do not include the Northern Bypass and Wet-Dock Crossing schemes which are recognised as being long-term aspirational projects upon which the development and growth advocated

by the CS does not depend (**PC110, PC116, PC117, PC120, PC213, PC214**).

66. However, the focusing of development within the centre of Ipswich, particularly employment, is likely to increase existing transport pressures. The CS provides the policy framework to facilitate the location and design of development to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport.
67. The CS seeks to identify and secure implementation of a coherent and concerted package of measures covering all aspects of travel in the wider Ipswich area, to achieve a significant shift to more sustainable travel. It outlines an integrated package of sustainable transport measures which support residential and employment growth. Planned improvements incorporate improved bus/train services/ facilities, including safe and convenient access to public transport; traffic management system; appropriate car parking for its location and associated use; new cycle routes/facilities; and signage to improve walking routes, all to provide a convenient alternative to the car. All of these measures amount to quality transport solutions which would serve to mitigate the impact of the promoted growth envisaged by the CS (*Ipswich - Transport Fit for the 21st Century*, CD ICD33).
68. The CS transport priorities of reducing demand for car travel for local journeys; improving infrastructure to make it easier for people to travel without the car; and better traffic management to get more efficiency from the existing network are soundly based. They include appropriate flexibility to safeguard the delivery of the strategy in this regard.

Infrastructure, Monitoring and Implementation Framework

Whether the Core Strategy has clear mechanisms for delivery, implementation and monitoring.

69. For a CS to be successful it must be underpinned by realistic infrastructure provision. Both submitted CS Table 6 (**PC 214** amended to Table 8) and CS Policy CS17 identify the infrastructure needed to support the planned growth in the Borough. What, when and who will provide the critical infrastructure is included in the table, along with the expected cost and the funding source.
70. The CS centres on development concentrated within the central Ipswich IP-One area mainly on PDL. A significant percentage of central Ipswich is identified as being at risk of flooding (Zones 2 & 3a). Therefore, one of the key infrastructure components to deliver the CS in this regard is the *Ipswich Flood Defence Management Strategy* (CD ICD31). The strategy is largely dependant on the securing and completion of the Flood Tidal Surge Barrier scheme (CS Policy CS18).
71. Funding has been secured this year for the Barrier design work. The Environment Agency (EA), who are the lead delivery body in this regard, are confident that following earlier commitment to works to lockgates and the river walls (**PC98**), money will be available in the annual round of bidding for

funding to complete the scheme. Experience so far seems to support their optimism to deliver the scheme as a medium term project (**PC99**). Were there to be delay in such provision, this would jeopardise meeting CS development targets over the plan period. However, in the case of housing, policy changes already set out in relation to the sections on the “Location and Amount of Housing” and the NF, would allow adjustments to be made in respect of compensating for a lower rate of development than expected within the central Ipswich area.

72. The need for intervention would be monitored through the AMR; success rates in obtaining funding by the EA; and the progress in construction of the Flood Tidal Barrier scheme.
73. The AMR will be the main tool of reviewing the progress, performance and delivery of the CS measured against the relevant aims, objectives and targets. Any review of the CS (2012/2013) would be associated with the continued gathering of evidence and the identification of issues through the AMR (**PC223**).

Development Management Policies

Whether the Development Management Policies will create an effective, well advised and appropriate framework to achieve sustainable development of a high quality in all respects.

74. The Development Management Policies, subsumed into the CS document, presents a suite of some 33 policies (**PC189** reduces the number to 32) which seek to manage growth; deal with environmental protection and enhancement; secure balanced communities and economic prosperity; as well as promoting quality of life. A number of these policies have already been considered above in tandem with the policies of the CS and where they relate to their soundness.
75. Only submitted CS Policy DC3 is subject to significant change. It seeks to ensure that new residential developments deliver suitable, high quality and environmentally sustainable living environments. The policy standards for the provision of private outdoor living space are reasonable, but change **FPC32** introduces flexibility into how the standards are applied where justifying circumstances prevail.
76. Within associated paragraph 9.25 **FPC33** removes the unjustified and unfairly prescriptive requirement that in smaller properties with small gardens, permitted development rights to extend such dwellings would be withdrawn.
77. Following a thorough consideration of the remaining policies only minor changes were required, predominantly in respect of the flexibility of policy terms. These changes are detailed in Appendix B and I endorse them as serving to hone the Development Management Policies to provide an effective and cohesive policy framework, the implementation of which would be capable of achieving high quality sustainable development.

Legal Requirements

My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The CS is identified within the latest approved LDS March 2011 (5 th Edition-4 th Revision) (CD PCD62) which sets out an expected adoption date of September 2011. Clearly this is out of date and a more reasonable expected adoption date would be December 2011/January 2012. This change notwithstanding, in general the CS’s content and broad spread of timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI (CD ICD05) was adopted in 2007 and consultation has been generally compliant with the requirements therein. The consultation on the post-submission proposed changes (PC) and further proposed changes (FPC) were compliant with the spirit of the SCI in the time frame of the Examination.
Sustainability Appraisal (SA)	SA, including up-dates, has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA (CD ICD04) was updated in relation to a series of focused changes over the course of the Examination (CD PCD64, ECD03, ECD14 and ECD15). The totality of the AA carried out is adequate.
National Policy	The Core Strategy generally complies with national policy.
Regional Strategy (RS)	The Core Strategy is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

I conclude that with the changes proposed by the Council, set out in Appendix A, the Ipswich Borough Council Core Strategy & Policies Development Plan Document satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore, I recommend that the plan be changed accordingly. For the avoidance of doubt, I endorse the Council’s proposed minor changes, set out in Appendix B.

Frances Mahoney

Inspector

This report is accompanied by:

Appendix A (separate document) Council Significant Changes that go to soundness

Appendix B (separate document) Council’s Minor Changes

Appendix A

Examination into the Ipswich Borough Council Core Strategy & Policies Development Plan Document

SCHEDULE OF SUGGESTED SIGNIFICANT CHANGES

The Schedule below contains those changes referred to in the Report which the Council has promoted as being necessary for the Core Strategy to be found sound and which are recommended by the Inspector.

The changes below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Suggested Change
FPC1	14	Part A-The Context Chapter 3	<i>Add a new paragraph to the end of the chapter:</i> <u>Ipswich Borough Council considers that a jobs-led growth strategy is the right one for Ipswich. However, the Council has amended the scale and speed of growth for Ipswich in this development plan document to take account of factors such as the recession, the likelihood of reduced funding for infrastructure, the extent to which flats and houses are best meeting local housing needs, and updated information about the housing land supply.</u>
FPC2	28	Part B – The Strategy Chapter 6 - 6.8, clause 3	<i>Amend clause 3:</i> At least (a) 15,400 <u>14,000</u> new dwelling units shall be provided in Ipswich between 2001 and 2021 (18,720 to 2025 <u>18,200 by 2027</u>) in a manner that addresses identified local housing needs and provides a decent home for everyone, with at least 70% <u>60%</u> of them being on previously developed land and at least 35% of them <u>on larger sites</u> being affordable homes; ...
FPC3	47	CS7/ 8.75	<i>Add the following text at the end of the paragraph:</i> <u>'However, the Council revised this figure to 700 dwellings per annum (14,000 from 2001 to 2021) in the light of additional local evidence.'</u>
FPC4	47	CS7/ 8.76	<i>In the second sentence:</i> Therefore, the number of dwellings that the Council will need to allocate land for through the Local Development Framework process is now fewer than 15,000 <u>14,000</u> .

Ref	Page	Policy/ Paragraph	Suggested Change
FPC5	47	CS7/ Table 2	<i>Amend figures and table notes to reflect April 2010 baseline, 700 dwelling per annum housing target, and 2027 end date – see revised Table 2 attached at the end of this schedule.</i>
FPC6	48	CS7/ 8.77	<i>Delete the whole paragraph:</i> The wider Ipswich Policy Area, including parts of Babergh District Council, Mid Suffolk District Council and Suffolk Coastal District Council, has a target of at least 20,000 dwellings over the whole period. It should be noted that the Ipswich and Ipswich Policy Area targets are minima.
FPC7	48	CS7/ 8.79	<i>Delete the last sentence of the paragraph:</i> 'The Regional Spatial Strategy advises that for the years beyond 2021, we should assume an annual development requirement of 830 dwellings per year.'
FPC8	48	Policy CS7 The Amount of New Housing Required	<i>In the first sentence:</i> The Council will allocate land to provide for at least an additional 5003 <u>4,786</u> dwellings net to be provided in the Borough by 2021 <u>2022</u> .
FPC9	49	CS7/ 8.82	<i>In the first sentence:</i> Taking account of the known supply at April 2009 <u>2010</u> , and assuming that 10% of the units with planning permission or awaiting the signing of a planning agreement will not actually be built within the plan period, it is suggested that the Council should allocate land for at least 5,003 <u>4,786</u> dwellings.
FPC10		Tables 3 & 4	<i>Insert new Table 3 Estimated Housing Delivery for 2010-2027 Excluding Current Permissions as at 1st April 2010, and Table 4 Estimated Housing Delivery and Previously Developed Land (PDL) Trajectory (including sites with planning permission and under construction). See attached.</i>
FPC11	52	Policy CS9 Previously Developed Land Target (PDLT)	<i>In the first line:</i> From 2010 to <u>the end of the plan period in 2027</u> 2021 , at least 70% <u>60%</u> of development
FPC12	53	Policy CS10 Ipswich Northern Fringe	<i>Delete the last sentence of the first paragraph:</i> 'The precise number of dwellings required will be determined by the review of the Regional Spatial Strategy.' <i>In the second paragraph:</i> ..., the delivery of up to 1,000 of these dwellings will be expected to commence <u>prior to 2021</u> during the plan's second phase on land to the east of Henley Road and south of the railway line. The Site will be identified through the Site Allocations and Policies document.

Ref	Page	Policy/ Paragraph	Suggested Change
			<i>Delete sentence in the second paragraph of policy:</i> The new Regional Spatial Strategy that will allocate housing numbers to 2031 will have an impact on the precise scale of any required development in the Northern Fringe.
FPC13	53	Policy CS10 Ipswich Northern Fringe, clause b.	<i>Amend clause b:</i> identify the infrastructure that developments will need to deliver <u>on a comprehensive basis</u> alongside new housing, <u>including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration;</u> and
FPC14	54	Policy CS10 Ipswich Northern Fringe	<i>Add to the end of the penultimate paragraph of the policy:</i> <u>... links to Westerfield Station, and provide the opportunity for the provision of a country park within the Northern Fringe as envisaged by CS16 and as shall be more particularly identified in the SPD.</u>
FPC15	54	Policy CS10 Ipswich Northern Fringe	<i>In the last paragraph of the policy:</i> Should housing delivery on previously developed land at 2015 be falling significantly short of requirements, the Council ...
FPC16	54	CS10 / 8.106	<i>Delete the paragraph:</i> The Government Office for the East of England has been working with the East of England Regional Assembly to prepare a new Regional Spatial Strategy that will cover the period up to 2031. One of the key elements will be the housing targets the new document will set for local authorities to plan for within their Local Development Frameworks. In the case of Ipswich Borough, any additional housing allocated to Ipswich in this new regional plan is likely to have significant implications for the Northern Fringe of Ipswich. The Government intends to have the new regional plan adopted by 2011.
FPC17	54	CS10 / 8.107	<i>Add new text and make amendments at beginning of paragraph:</i> <u>The indicative capacity at the Northern Fringe identified in the Strategic Housing Land Availability Assessment is about 4,500 dwellings.</u> When determining its views on any new Regional Spatial Strategy, <u>the precise number and timing of delivery of dwellings needed at the Northern Fringe,</u> the Council will use <u>a range of evidence including the Ipswich Housing Needs Study</u> projections for the whole of Ipswich Policy Area, projections for employment demand, demand for Ipswich Borough housing stock ...
FPC18	54	CS10 / 8.108	<i>Delete the first two sentences:</i> The Council will continue to engage with the Regional Assembly in order to ensure that the best interests of the population of Ipswich are considered as part of the Regional Spatial Strategy process. The Council will seek justification of the overall growth numbers, and of the timetable for that expected growth.

Ref	Page	Policy/ Paragraph	Suggested Change
FPC19	54	CS10 / 8.109	<i>In the first line:</i> The policy provides for residential led development at the It is considered that parts of the Northern Fringe could be suitable for residential led development in appropriate circumstances.
FPC20	54	CS10/ 8.111	<i>Delete whole paragraph:</i> This does not mean that all the land is formally allocated for development. The detailed merits of doing that would need to be considered via the next version of the Regional Spatial Strategy, which will provide a housing target for Ipswich up to around 2031.
FPC21	54	CS10 / 8.111	<i>Relocate paragraph 8.113 to follow paragraph 8.110, with amendments:</i> The Council recognises that it will need to keep the delivery of housing under review and it may be the case that further housing is required within the Northern Fringe up to 2021. At most, the Council envisages that this might mean a maximum of 1,500 dwellings would be required in the Northern Fringe <u>prior to 2021, in the second phase of the plan (i.e. ready for occupation between 2016 and 2021).</u> <u>The final paragraph of the policy allows for this.</u>
FPC22	55	CS10/ 8.112	<i>In the first line:</i> In developing an area even for 1,000 <u>to 1,500</u> dwellings, the infrastructure ... <i>Add new sentence four to the paragraph:</i> <u>Prior to development on the Ipswich School Playing Fields site, replacement sports facilities will be required to be first provided in accordance with Policy DC29.</u>
FPC23	55	CS10/ 8.114	<i>Amendments throughout the paragraph:</i> The total number of dwellings likely to be accommodated at the Northern Fringe <u>could be as much as 4,500 in the longer term, but this will be determined through a in the light of the review of Regional Spatial Strategy, the Core Strategy which will provide new housing targets up to 2031. The Council will commence a review of the Core Strategy in 2012/13. This will provide plenty of opportunity for interested parties – be they developers, landowners, local residents or others – to get involved and have their say prior to the extent of Northern Fringe development being determined.</u> However, to ensure that any development proposed for this area prior to 2021 conforms to a coherent plan, and in recognition of the historic variability of figures and deadlines within the Regional Spatial Strategy system, work on the supplementary planning document will commence as soon as the Core Strategy has been adopted. The work on the supplementary planning document will incorporate sufficient flexibility to allow for a wide range of housing numbers for the Northern Fringe. The supplementary planning document would not be completed until after the next Regional Spatial Strategy is adopted.

Ref	Page	Policy/ Paragraph	Suggested Change
FPC24	55	CS11 / (new) 8.117	<p><i>Insert new paragraph after 8.116:</i></p> <p><u>Work is being undertaken with neighbouring authorities, the County Council and the Gypsy community to identify possible sites to meet the need to provide additional pitches in the Ipswich Policy Area. The policy below will provide the context for the ongoing provision of pitches over the plan period.</u></p>
FPC25	55	Policy CS11 Gypsy and Traveller Accommodati on	<p><i>Delete first paragraph:</i></p> <p>The Council will work with neighbouring authorities to identify and deliver additional permanent sites for Gypsies and Travellers in the wider Ipswich area, where need is proved.</p> <p><i>Insert new first paragraph:</i></p> <p><u>Provision will be found within the Ipswich Policy Area for additional pitches to meet any shortfall in provision required by Regional Spatial Strategy to 2021, and thereafter such further need as may be identified through the Gypsy and Travellers Accommodation Assessment (or such other review mechanisms as shall replace it). Sites will be allocated through the Site Allocation and IP-One AAP DPDs.</u></p> <p><i>Delete paragraph:</i></p> <p>If site allocations through the Local Development Framework are needed within Ipswich up to 2021, they will be progressed through the Site Allocations and Policies development plan document or the IP-One Area Action Plan.</p>
FPC26	56	CS11 / 8.118	<p><i>Amend paragraph:</i></p> <p>The wider Ipswich area means broadly within a ten mile radius of the Borough boundary. Sites will be sought to meet the joint needs of Ipswich and neighbouring authorities for permanent pitches within this wider area. Ipswich Policy Area. All four neighbouring local planning authorities had needs identified by the RSS and Gypsies and Travellers Accommodation Assessment (GTAA) carried out in 2007. The joint GTAA 2007 is currently being updated and is expected to be published towards the end of 2011. The identified need will inform the site allocations in the subsequent DPDs and a future review of the Core Strategy. have been set a target in RSS to provide additional pitches in the short and medium term. At present site provision is supported by a national grant scheme to assist in delivery.</p>
FPC27	56	CS11 / (new) 8.119	<p><i>Insert new paragraph after 8.118:</i></p> <p><u>The Council will work with Suffolk authorities to meet the joint transit needs and the needs of travelling showpeople. The GTAA update will review needs and the Council will demonstrate through the Site Allocation and IP-One AAP DPDs where and when this need will be met.</u></p>

Ref	Page	Policy/ Paragraph	Suggested Change
FPC28	56	CS11 / 8.120	<p><i>Amend paragraph:</i></p> <p>Contrary to the regional allocation of 15 pitches, the local Gypsy and Traveller Accommodation Assessment carried out in 2007 identified a need in Ipswich for 1-3 additional permanent pitches and 10 transit pitches by 2011. The Council will work with the Gypsy and Traveller communities to ascertain need in particular locations, prior to the <u>identification or allocation of sites.</u> production of the Council's Site Allocations and Policies development plan document.</p>
FPC29	58	Policy CS12 Affordable Housing	<p><i>Amend clause a. of the policy:</i></p> <p>40% <u>35%</u> affordable housing provision</p>
FPC30	58	CS12 / 8.126	<p><i>Delete whole paragraph:</i></p> <p>The Regional Spatial Strategy sets out a target of 35% affordable housing to be achieved across the region. The 40% target for Ipswich in the policy above is more challenging, but taking account of the Ipswich Housing Needs Study and the Strategic Housing Market Assessment, and the fact that the plan covers the period to 2021, the Council considers this an appropriate Borough-wide target to aim for.</p>
FPC31	64	CS14 / 8.161	<p><i>Delete whole paragraph:</i></p> <p>The Council considers that there is not a justification for further major out-of-centre retailing, which would detrimentally impact on the existing Central Shopping Area, district and local centres, and reduce the chances of substantial investment in the Central Shopping Area. In reaching this view it is recognised that there are suitable sites within the Central Shopping Area for major retail investments.</p>
FPC32	85	Policy DC3 Provision of Private Outdoor Amenity Space in New and Existing Developments	<p><i>In the second sentence:</i></p> <p>Provision will be in accordance with the following standards <u>unless this would unavoidably conflict with the need to meet other density and urban design requirements of the plan or an applicant is able to demonstrate that a lower figure would be acceptable having regard to the particular circumstances of the proposals. In all cases applicants will be expected to demonstrate that adequate provision of private outdoor amenity space will be provided for the likely occupancy of the proposed dwellings.</u></p>
FPC33	85	DC3 / 9.25	<p><i>In the first sentence:</i></p> <p>It is accepted that smaller properties, less likely to be occupied by families with children, may reasonably function with a smaller rear garden of at least 50 sq. m although in these cases houses must be indicated as not extendable and permitted development rights to extend such properties will be withdrawn by way of a condition on any planning permission.</p>

Ref	Page	Policy/ Paragraph	Suggested Change
FPC34	93	Policy DC7 Public Art	<p><i>In the first sentence:</i></p> <p>Major developments shall include a substantial public art proposal likely to be equivalent to about 1% of the construction contract value of the development scheme <u>unless it can be demonstrated that this percentage would render the scheme unviable or would be disproportionate to the nature, size and location of the development.</u> Proposals must be fully integrated into the proposed development at the design stage.</p>
FPC35	116	Policy DC31 The Density of Residential Development	<p><i>Amend clause c. of the policy:</i></p> <p>elsewhere in Ipswich, low density development will be required, achieving a density of at least 30 dph (the average will be take <u>taken</u> as 35 dph).</p>

TABLE 2 HOUSING LAND SUPPLY AND REQUIREMENT AT APRIL ~~2009~~ 2010

FPC5

		Number of dwellings	Discounted Numbers	Cumulative Numbers
1	Units completed between 2001 and 2009 <u>2010</u>	6,225 <u>6,566</u>	-	6,225 <u>6,566</u>
2	Units under construction	984 <u>673</u>	-	7,209 <u>7,239</u>
3	Units with planning permission	2,836 <u>2,137</u>	2,552 <u>1,923</u>	9,761 <u>9,162</u>
4	Units with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	707 <u>836</u>	636 <u>752</u>	10,397 <u>9,914</u>
5	Number of units required on new site allocations to 2021 <u>2022</u> (@ 700 <u>700 dwellings p.a.</u>)	5,003 <u>4,786</u>		15,400 <u>14,700</u>
6	Requirement for years 2021 <u>2022-2025</u> 2027 @ 830 p.a. <u>700 p.a.</u>	3,320 <u>3,500</u>		18,720 <u>18,200</u>

TABLE NOTES

The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.

Line 1: Actual numbers of dwellings built between 1st April 2001 and 31st March ~~2009~~ 2010.

Line 2: Units under construction at 31st March ~~2009~~ 2010 - assumed that all will be completed over the plan period.

Line 3: Other units with planning permission at 31st March ~~2009~~ 2010 - assumed that 10% of these will not be completed.
 Note 150 dwellings reduction reflects site IP038: Great Whip Street planning permission being revised from 351 to 307 dwellings, and 47 Key Street disappearing from the housing land supply resulting in a reduction of 106 dwellings.

Line 4: Units with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31st March ~~2009~~ 2010 - assumed that 10% of these will not be completed.

Line 5: To reach the regional target of ~~15,400~~ 14,700 units by ~~2021~~ 2022 further land will need to be allocated for at least ~~5,003~~ 4,786 new homes.

Line 6: Because the Core Strategy (see paragraph 8.86) is required to identify sites or broad areas for future development in years 11 to 15 of the plan period, the ~~RSS~~ requirement has been extended to 2026-27 and added to the ~~2021~~ 2022 total.

See paragraph 8.83 of Core Strategy and Policies DPD

Add new Table 3:

FPC10

Table 3 (existing Table 3 and subsequent tables to be renumbered): Estimated Housing Delivery for 2010-2027 Excluding Current Permissions as at 1st April 2010

Area of Ipswich	%age (dwellings) Previously developed land	Additional dwellings 2010-2022	Additional dwellings 2022-2027
IP-One	100%	1,699	
Rest of built up area	71%	1,511 (PDL: 1,080)	
Northern Fringe south of railway line, west of Westerfield Road	0%	1,500	
Northern Fringe north of railway line east of Henley Road, and east of Westerfield Road (see policy CS10)	0%	300	
Total 2010-2022	55%	5,010	
Small windfall sites	100%		300
Large unidentified brownfield sites	100%		1,650
Northern Fringe north of railway line east of Henley Road, and east of Westerfield Road (see policy CS10)	0%		1,500
Total 2022-2027	57%		3,450

Add new Table 4:

FPC10

Table 4: Estimated Housing Delivery and Previously Developed Land (PDL) Trajectory (including sites with planning permission and under construction)

Time period	2001-2009	2009-2010	2010-2022	2022-2027
Housing Delivery	6,177	389	8,518	3,533
PDL%	95%	95%	71%	57%

Appendix B

Examination into the Ipswich Borough Council Core Strategy & Policies Development Plan Document

SCHEDULE OF SUGGESTED MINOR CHANGES

The Schedule below contains suggested minor changes put forward by the Council which are endorsed on a general basis in the interests of clarity and accuracy. They are recommended by the Inspector only because the Council cannot change the document, even to correct minor errors, without a recommendation.

The changes below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Suggested Change
PC1	N/A	Title of Plan	<i>Correct title to:</i> <u>Ipswich Borough Council Proposed Submission Core Strategy and Policies Development Plan Document</u>
PC2	N/A	Date of Plan	Update the cover upon adoption to reflect the relevant date.
PC3	2	Foreword	<i>Amend to bring it up to date at the time of adoption.</i>
PC4	4	Note	<i>Remove note.</i>
CHAPTER 1 INTRODUCTION			
PC5	5	1.8	<i>In line 2:</i> ... for the future development of Ipswich to 2025 <u>2027</u> .
PC6	5	1.11	<i>In line 3:</i> ... plans and strategies prepared at <u>sub</u> -regional and local levels ... <i>In penultimate line:</i> Some of the key <u>sub</u> -regional and local strategies ...
PC7	6	Diagram 1	<i>Delete 'Implementation Plan' and 'Regional Economic Strategy' from the diagram, but retain 'Regional Spatial Strategy'. Delete reference to Building Schools for the Future.</i>
PC8	7	1.13	<i>Delete paragraph.</i>
PC9	7	1.14	1.14 When it is formally adopted, once all the stages of its production process are complete (see paragraph 1.19), it <u>The adopted Core Strategy and Policies development plan document is</u> will be formally part of the development plan and therefore have <u>has</u> significant weight via the Planning and Compulsory Purchase Act 2004 - i.e. "... for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the (development) plan unless material considerations indicate otherwise." (Section 38(6) of the Act).
PC10	7	1.15	<i>Delete paragraph and replace with:</i> <u>The Council is required to keep the plan under review and it is therefore anticipated that a review will be commenced in 2012/2013.</u>
PC11	7	1.16	<i>Delete paragraph</i>
PC12	7	1.17	<i>Delete paragraph</i>
PC13	7	1.18 to 1.23	<i>Delete paragraphs</i>
PC14	8	1.24-1.25	<i>Delete paragraphs</i>

Ref	Page	Policy/ Paragraph	Suggested Change
CHAPTER 2 THE NEW PLANNING SYSTEM			
PC15	11	2.5	Add to end of paragraph: <u>The adopted Local Plan Proposals Map will remain extant until replaced through other development plan documents (DPDs) to be prepared as part of the Ipswich Local Development Framework.</u>
PC16	N/A	Proposals Map	<i>Provide a key to the Core Strategy Proposals Map which explains the relationship with the adopted Local Plan Proposals Map.</i>
PC17	12	Diagram 2	<i>Add boxes for a Proposals Map alongside the Core Strategy, the IP-One Area Action Plan and the Site Allocations and Policies DPD. Relocate the box for the 'Northern Fringe Area Development Brief' to indicate that it stems directly from the Core Strategy and Policies DPD.</i>
CHAPTER 3 THE REGIONAL SPATIAL STRATEGY			
PC18	14	3.2	<i>Delete paragraph</i>
PC19	14	3.4	<i>Delete paragraph</i>
CHAPTER 5 IPSWICH – THE PLACE			
PC20	16	Map 1	<i>Improve the quality of Map 1 showing Ipswich in its sub-regional context</i>
PC21	20	5.22	<i>Opportunities to radically change the traffic patterns in Ipswich <u>is</u> are therefore ...</i>
PC22	23	5.30	<i>Over the plan period to 2025 <u>2027</u>, the issues ...</i>
CHAPTER 6 VISION AND OBJECTIVES			
PC23	27	6.7	<i>As a result, by 2025 <u>2027</u> Ipswich will be ...</i>
PC24	28	6.8, 6.	<i>Amend second bullet point: - Additional east-west highway capacity should <u>could</u> be provided within the plan period ... Amend third bullet point: - Ipswich Borough Council aspires to an enhanced public transport system, such as guided bus, urban light railway, <u>or</u> trams. or monorail.</i>
PC25	29	6.13	6.13 <i>Much of the central area ... In exceptional circumstances 'more vulnerable' development, such as housing or education, or 'highly vulnerable' development in flood zones may be possible if it is (a) safe without increasing flood risk elsewhere <u>provides wider sustainability benefits to the community that outweigh flood risk;</u> (b) provides wider sustainability benefits to the community that outweigh flood risk <u>is on previously developed land;</u> and (c) is on previously developed land <u>is safe without increasing flood risk elsewhere</u> (the Exception Test).</i>
PC26	30	6.14	<i>This is close to the overall number needed to meet growth requirements between April 2009 <u>2010</u> and April 2025 <u>2027</u> (approximately 8,300 dwellings).</i>
PC27	30	6.15	<i>... and it is anticipated that this will be achieved by 2013 <u>2014</u> (Policy CS18).</i>
PC28	30	6.16	<i>The flood defences <u>strategy</u> will reduce flood risk significantly. However <u>the residual risks resulting from the possibility of overtopping, breach or failure of gates or walls</u> also needs to be considered. This results from the possibility of overtopping, breach or the failure of the gates or walls. Where All development needs to <u>be safe and when "more vulnerable" developments (including housing)</u> need to be sited in f<u>Flood z</u>Zone 3a, they should pass the sequential and exception tests <u>described in PPS25. The Council's Level 2 Strategic Flood Risk Assessment (SFRA) provides guidance</u></i>

Ref	Page	Policy/ Paragraph	Suggested Change
			<p><u>on residual flood risk both for the situation with existing defences at 2011 and also for the future situation, with the proposed flood barrier implemented. The SFRA also suggests a framework for safe development relevant to either case. The proposed safety framework will be detailed in a future SPD and includes requirements for:</u></p> <ul style="list-style-type: none"> • <u>Structural Safety of buildings;</u> • <u>Emergency plans for actions by emergency responders;</u> • <u>Emergency plans for evacuation and flood warning arrangements for users of buildings;</u> • <u>Temporary Refuges;</u> • <u>Safe emergency access for Fire & Rescue Service;</u> • <u>Safe access/escape routes for building users;</u> • <u>Raised floor levels; and</u> • <u>Flood resilience measures.</u> <p>It is likely that raised floor levels, safe refuge and flood plans and warning systems would need to be in place to enable such development to occur. Safe access may be required for some higher risk sites. The Council intends to produce guidance on this in a Level 2 Strategic Flood Risk Assessment.</p>
PC29	31	6.19	The Core Strategy will identify <u>identifies</u> a Strategic Employment Site ...
CHAPTER 7 THE KEY DIAGRAM			
PC30	31	7.2 (iii)	The approach to the Northern Fringe as the location of limited development 2016 to prior to 2021, and ...
PC31	31	7.2 (v)	The green corridor and green ring <u>rim</u> approach to strategic green infrastructure (Policy CS16). † and
PC32	31	7.2 (vi)	Delete clause (vi): The main transport infrastructure proposals (i.e. Policy CS20).
PC33	32	Diagram 3: The Ipswich Key Diagram	<p><i>Council to improve the key diagram to improve print quality, use stronger colours, better represent the Northern Fringe policy CS10 by showing the areas involved (and amending the key), remove reference to exploration of additional east-west capacity, improve the illustration of green corridors, and make it larger. The amended key diagram is attached to the end of this schedule. Wording for the key in relation to the new depiction of the Northern Fringe proposals:</i></p> <p><u>Area for Delivery of Housing & Associated Facilities prior to 2021</u> <u>Broad Area for Housing & Associated Facilities after 2021</u></p>
CHAPTER 8 DEVELOPMENT OF THE STRATEGY			
PC34	35	CS1 / 8.14	The Council plans to prepare a supplementary planning document on sustainable construction during 2010 <u>when the Core Strategy is adopted</u> . This will ...
PC35	36	CS1 / 8.19	The Council also signed the Nottingham Declaration on Climate Change in 2008 and, as a result, is preparing a climate change strategy in 2009 . The Council also ...
PC36	36	CS1 / 8.20	The UK Climate Change Act 1990 <u>2008</u> calls for at least 26% reductions ...
PC37	37	POLICY CS2 The Location and Nature of Development	<p><i>Amend clause d.:</i> Promoting a strategic employment site at Cranes, Nacton Road, to support growth in the ICT and other related and creative arts sectors <u>economic development and jobs growth</u>;</p> <p><i>Amend paragraph following clause g.:</i> In addition to the above locations, a sustainable urban extension to north Ipswich may be permissible <u>is planned</u> subject to the prior</p>

Ref	Page	Policy/ Paragraph	Suggested Change
			provision of suitable infrastructure (see Policy CS10).
PC38	38	CS2 / 8.25	<i>Amend third sentence:</i> The exact boundaries of these areas will be defined <u>on the Proposals Map</u> within <u>through</u> the IP-One ... <i>Add to end of paragraph:</i> <u>Residential densities are defined in Policy DC31.</u>
PC39	38	CS2 / 8.28	... and Planning Policy Statement 6 4 <u>(PPS6 PPS4) Town-Centres Planning for Sustainable Economic Growth</u> , and maximises ...
PC40	38	CS2 / 8.29	The approach to locating employment uses focuses office activity into the town centre, in accordance with <u>PPS6 PPS4</u> , to support its vitality ...
PC41	39	CS2 / 8.32	If a Any Northern Fringe development takes place (see policy CS10) it should also contain a district centre that would join the above list. This would provide a range of facilities and operators in line with the definition in <u>PPS6 PPS4</u> .
PC42	40	POLICY CS3 IP-One Area Action Plan	<i>Amend second sentence of policy:</i> The Area Action Plan will <u>include policies which:</u> <i>Add sentence to end of policy after clause i.:</i> <u>Sites and designated areas within the IP-One area will be identified on a revision of the Proposals Map to be prepared alongside the DPD.</u>
PC43	42	CS4 / 8.42	<i>Amend bullet list:</i> <ul style="list-style-type: none"> • Planning Policy Guidance Note (PPG) 15 Planning and the Historic Environment; • Planning Policy Guidance Note 16 Archaeology; and • <u>Planning Policy Statement 5 Planning for the Historic Environment 2010²; and</u>
PC44	42	Footnote 2	Planning Policy Guidance Notes 15 and 16 are shortly to be have <u>now been</u> replaced by ...
PC45	43	CS4 / 8.48	<i>Add to end of paragraph:</i> <u>Development at the Northern Fringe will provide an opportunity to contribute to biodiversity.</u>
PC46	43	CS4 / 8.52	There is already an Ipswich Local List dating from 1977, which will be updated and adopted as a supplementary planning document during 2010 <u>2011</u> .
PC47	44	CS4 / 8.55	A basic policy <u>Policies</u> for the protection of assets ... is are set out within Part C of this document.
PC48	45	POLICY CS5 Improving Accessibility	Development should be located and designed to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport (<u>bus and rail</u>). This ...
PC49	46	CS6 / 8.68	<i>Add to end of existing paragraph:</i> <u>In planning strategically for housing, employment and infrastructure provision, the Council will need to work closely with neighbouring local authorities to ensure a coordinated approach.</u>
PC50	46	POLICY CS6 The Ipswich Policy Area	<i>Add to end of clause a.:</i> Formal working through the Ipswich Policy Area Board <u>or other relevant forums;</u>
PC51	47	8.72	The strategic planning of new homes is a key part of the Local Development Framework. This section addresses the strategic issues associated with the Regional Spatial Strategy requirement to provide at least an additional 15,400 homes in Ipswich in the period from 2001 to 2021 <u>delivering new homes.</u>
PC52	47	CS7 / Table 2	<i>Ensure Table 2 and the table notes appear on the same page.</i>
PC53	47	CS7 / 8.76	<i>In the first sentence:</i> In the eight <u>nine</u> years that have elapsed since 2001, ... <i>In the third sentence:</i>

Ref	Page	Policy/ Paragraph	Suggested Change
			Table 2 below sets out the housing land supply and requirement figures as at April 2009 <u>2010</u> .
PC54	48	CS7 / 8.78	<i>In the final line:</i> ... development plan document (scheduled for 2010).
PC55	48	CS7 / 8.79	<i>In the second sentence:</i> ... broad locations for future growth should be indicated (i.e. in the case of this Ipswich Core Strategy, for housing growth to about 2025 <u>2027</u>).
PC56	48	CS7 / 8.80	The issue of additional allocations and / or broad locations for growth up to 2025 <u>2027</u> is addressed as part of the consideration of Policy CS10.
PC57	48	POLICY CS7 The Amount of New Housing Required	<i>Add new first sentence to the policy:</i> <u>The Council will enable continuous housing delivery for at least fifteen years from the adoption of this plan. The Council will allocate land ...</u> <i>Delete reference to phasing:</i> ... in this Core Strategy. Housing allocations will be made and released in two phases: Phase 1 2010 to 2015 (5 years) Phase 2: 2015 to 2021 (6 years). <i>Add new last sentence to the policy:</i> <u>Land supply for the years 2021 to 2027 is addressed principally by the Northern Fringe development.</u>
PC58	49	CS7 / 8.81	Table 2 shows that, as a result of housing completions between 2001 and 2009 <u>2010</u> , just under 9,200 <u>7,500</u> units remain to be delivered between 2009 <u>2010</u> and 2021 <u>2022</u> in order to meet the Regional Spatial Strategy requirement.
PC59	49	CS7 / 8.83	<i>Amend the paragraph:</i> The phasing of housing sites will be set out in the Site Allocations and Policies and IP One Area Action Plan development plan documents, and will be informed by the findings of the SHLAA. The phasing of housing sites will be informed by the findings of the SHLAA, infrastructure delivery and the preparation of master plans. The SHLAA informs the Council's housing trajectory, which is summarised below. It is based on recent contact with developers and landowners. The SHLAA at March 2010 shows an indicative capacity of about 9,400 dwellings, and will be updated on an annual basis. It is from this potential supply that site allocations will be drawn. Within the tightly drawn boundary of Ipswich, options for the housing land supply are inevitably limited. Table 3 below provides a breakdown of the housing land supply whilst Table 4 provides a breakdown by delivery period. Delivery will be closely monitored through the Council's Annual Monitoring Report.
PC60	50	POLICY CS8 The Balance Between Flats and Houses	<i>Delete clause d.:</i> c. A different approach would expedite the delivery of housing needed to meet targets and is acceptable in other planning terms; and d. The approach would not prejudice the five year housing land supply.
PC61	52	CS9 / 8.99	<i>In the first line:</i> Between 2001 and 2009 <u>2010</u> , 95% of new residential development in Ipswich took place on previously developed land.
PC62	52	CS9 / 8.100	<i>In the second line:</i> Of the SHLAA supply, approximately 66% <u>59%</u> is previously developed land and 33% <u>41%</u> greenfield land, <u>excluding planning permissions.</u>

Ref	Page	Policy/ Paragraph	Suggested Change
			<i>Add new final sentence to the paragraph:</i> <u>The Council's published housing trajectory as at 1st April 2010, which includes planning permissions and an expected windfall allowance, shows the anticipated amount of development on PDL is approximately 67%.</u>
PC63	53	CS10 / 8.103	<i>Delete the second sentence:</i> The scheduled date of adoption is 2010. <i>Amend the third and fourth sentences:</i> Specific sites will need to be identified for the first five year phase and the second six year phase <u>ten years of the plan period</u> . For the last four <u>five</u> years, specific sites or broad locations can be indicated.
PC64	53	POLICY CS10 Ipswich Northern Fringe, clause a.	<i>Amend clause a.:</i> guide the development of the whole <u>Northern Fringe</u> area;
PC65	55	CS10 / 8.112	<i>Add new text to the end of the paragraph:</i> <u>Infrastructure requirements were considered during the appeal by Mersea Homes against the Council's refusal of outline planning permission for major residential led development at the Northern Fringe (application reference IP/09/00465/OUT). The Secretary of State dismissed the appeal on 30th September 2010. Key conclusions about infrastructure provision from the letter and the Inspector's report are reflected in the policy above.</u>
PC66	55	CS10 / 8.113	<i>Delete paragraph in this location (as relocated to follow 8.110).</i>
PC67	55	POLICY CS11 Gypsy and Traveller Accommodat ion	<i>In the second paragraph:</i> Sites for additional Gypsy and Traveller pitches will need to comply with <u>be assessed against</u> the following criteria. <i>In criteria a. and c.:</i> a. The site should be located: i. close to where it would be well served by the trunk road network; and ii. <u>where possible, within 1km ...</u> c. The site should not <u>have a significant adverse impact adversely on:</u> <i>Add to the final paragraph:</i> <u>Applications for new sites will be assessed again criteria a. to c. above.</u>
PC68	57	CS11 / 8.122	<i>Delete paragraph:</i> The Council is also working with neighbouring authorities to meet the requirement identified by the Regional Spatial Strategy Single Issue Review. However, if in addition to this there is a need to identify further sites, then this would be done through the site allocation development plan documents.
PC69	57	CS12 / 8.125	<i>Amend second bullet:</i> <ul style="list-style-type: none"> • one quarter of households consist of older persons only, and <u>such households account for 37% of all Council accommodation;</u>
PC70	57	CS12 / Footnote 4	... and which meet certain criteria. <u>It can include ...</u>
PC71	58	POLICY CS12 Affordable Housing	<i>Correct typographical error:</i> ... percentages of florerspace <u>floorspace</u> , not ...

Ref	Page	Policy/ Paragraph	Suggested Change
			<i>Amend final sentence:</i> At least 80% of affordable housing provision should consist of social rented housing, <u>subject to viability.</u>
PC72	58	POLICY CS12	<i>Relocate final paragraph of Policy DC25 to CS12 and add wording to end of paragraph:</i> The Council will only consider reducing the requirement for the proportion of affordable housing in an open market development where an independent assessment of the applicant's development costs is carried out at the applicant's expense, <u>which justifies a lower percentage figure on viability grounds.</u>
PC73	58	CS12 / 8.127	The targets will be subject to viability testing <u>on a site by site basis annually through the Annual Monitoring Report, using the Council's a recognised toolkit.</u>
PC74	58	CS12 / 8.129	If the Council agrees that provision at 40% <u>35%</u> or 20% is not viable on a specific site, then a slightly lower percentage, to be agreed, will still be expected.
PC75	60	POLICY CS13 Planning for Jobs growth, clause d.	<i>Replace final sentence of clause d.:</i> allocating 16.7ha of land at the site of the former Cranes factory at Nacton Road as a strategic employment site, with the principal access taken from Ransomes Way. The site will be safeguarded for B1, B2 and B8 uses. Sui generis employment uses will only be permitted if they support Ipswich's regeneration or the growth of key sectors such as the creative arts or ICT <u>Other uses would only be permitted if they secure the delivery of the strategic employment site;</u>
PC76	60	CS13 / 8.140	<i>In the third sentence:</i> The draft East of England Plan suggested 18,000 as the Ipswich apportionment but the adopted version suggests that Employment Land Reviews need to determine the detailed levels of provision in the three districts of Ipswich, Babergh and Suffolk Coastal. The Haven Gateway Employment Land Study 2005 forecast growth of 17,800 jobs in Ipswich between 2001 and 2021 (see Table 5).
PC77	60	CS13 / 8.141	<i>In 1st sentence:</i> A <u>more recent (2009) joint Employment Land Review</u> has been carried out by the three authorities Ipswich Borough Council, Suffolk Coastal District Council and Babergh District Council through the Haven... <i>In the 3rd sentence:</i> The Council will therefore seek to work through the Ipswich Policy Area Board <u>or other joint working forums</u> to ensure...
PC78	60	CS13 / 8.142	It is therefore suggested that Ipswich plan for a net addition of at least 18,000 jobs between 2001 and 2025. The IP-One Area Action Plan and Site Allocations and Policies development plan documents ...
PC79	60	CS13 / 8.143	<i>Delete the paragraph.</i>
PC80	61	CS13 / 8.144	<i>Insert two new paragraphs to follow existing paragraph 8.144:</i> <u>In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth between 2006 and 2026 as identified in the Suffolk Haven Gateway Employment Land Review (2009). These include:</u> <ul style="list-style-type: none"> • <u>construction;</u> • <u>retail / hotels;</u> • <u>distribution;</u> • <u>finance and other business services; and</u> • <u>public services.</u>

Ref	Page	Policy/ Paragraph	Suggested Change
			<p><u>The study also identified specific sectors which have a strong locational advantage in Ipswich compared to the rest of the region, combined with sectors showing strong growth rates since 1998. These give an indication of the sectors that are most likely to prosper in the future. They include:</u></p> <ul style="list-style-type: none"> • <u>water transport;</u> • <u>financial and insurance activities;</u> • <u>electricity, gas, steam and hot water supply;</u> • <u>public administration and defence; and compulsory social security;</u> • <u>support activities for transportation; and travel agencies; and</u> • <u>health and social work.</u>
PC81	61	CS13 / 8.147	<p><i>In line 7:</i> ... and is in accordance with PPS6 PPS4, which defines office as a town centre land use.</p> <p><i>In line 14:</i> ..., or are directly related to the key growth sectors identified in the Regional Spatial Strategy <u>and/or Employment Land Review</u> and are therefore performing a strategic role.</p>
PC82	61	CS13 / 8.148	<p><i>Amendments throughout the paragraph:</i> The Council recognises that there are likely to be some issues associated with the viability of developing the whole site for employment purposes. Therefore the Council would be prepared, if the case can be made on development viability grounds, to consider a broader mix of uses on the site if it would ensure that a strategic employment (Use Classes B1, B2 or B8) development (of more than 10 hectares of the site) is delivered. <u>If the applicant considers that some non-B Class uses are needed in order to deliver strategic employment on the site, the Council will require open book accounting and an independent assessment of viability calculations, to be carried out at the applicant's expense. The Council will look to permit the minimum amount of enabling development in order to deliver employment (B Class) uses. Employment uses will be required to occupy at least 10ha of the site.</u> In the event that this approach is followed <u>a flexible approach is adopted to the site's development</u>, the Council would require a Section 106 Agreement to ensure the actual development of the employment components of the site. Other uses that the Council may be prepared to consider positively include food led retailing on the Nacton Road frontage providing it is designed to effectively act as an extension to the Ravenswood District Centre and providing it complies with Policy DC23. <u>The Council may be prepared to consider an element of enabling retail development on the site providing it complies with PPS4 and Policy DC23.</u></p>
PC83	63	POLICY CS14 Retail Development	<p><i>In second paragraph, delete final sentence:</i> ... This will enable the delivery of at least 35,000 sq m net of additional floorspace to diversify and improve the retail offer. The Council will also limit the size of shops permissible at the Waterfront.</p>
PC84	63	CS14 / 8.157	<p>The policy responds to the findings of the Ipswich Retail Study 2005 as confirmed by the Retail and Commercial Leisure Study 2010 and Ipswich's role and status as a county town and a regional centre defined in the East of England Plan.</p>
PC85	63	CS14 / 8.158	<p><i>Replace first sentence:</i> The Ipswich Retail Study identified gaps in the retail offer of Ipswich</p>

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			town centre, as follows: <u>The Ipswich Retail Study 2005, as confirmed by the Retail and Commercial Leisure Study 2010 identified gaps in the retail offer of Ipswich town centre, as follows:</u>
PC86	65	POLICY CS15 Education Provision	<i>Amend first sentence of third paragraph:</i> The Council supports the upgrading of education facilities through the 'Building Schools for the Future' programme and will seek to ensure that community access to school facilities is maximised.
PC87	65	CS15 / 8.169	Delete final sentence: Construction of the facility is progressing and it is scheduled to open in September 2010.
PC88	66	CS15 / 8.171	The Council is supportive of the core principle of the Government's 'Building Schools for the Future' initiative — i.e. to substantially upgrade education facilities – and recognises that there is a need for substantial regeneration within existing sites.
PC89	66	CS16 / 8.177	<i>Add to end of paragraph:</i> <u>Open space provision is generally lowest in the north of the Borough, with an under-provision of parks and gardens in the North West and North East Area Forum areas, amenity green space in the North East area, and natural and semi-natural green space in the North West, Central and North East Areas. Other deficits affect more of the Borough, for example there is a significant shortfall in provision for young people across the Borough (such as skateparks, kickabout areas and youth shelters).</u>
PC90	66	CS16 / 8.179	<i>Add to end of paragraph:</i> <u>Planning Policy Guidance 17 Planning for Open Space, Sport and Recreation requires local authorities to set local standards for open space, sport and recreation facilities, based on a local assessment of needs. It also states that existing sites and facilities should not be built on unless they have been shown to be surplus.</u>
PC91	67	POLICY CS16 Green Infrastructure, Sport and Recreation	<i>Amend Clause a.:</i> ... requiring all development to contribute to the provision of open space according to the Borough's standards, identified strategic needs and existing deficits or surpluses in an area: <i>Amend clause h.:</i> ... promoting improved access to existing facilities where appropriate, e.g. through Building Schools for the Future; and <i>Amend final paragraph:</i> The IP-One Area Action Plan and Site Allocations and Policies development plan document will identify <u>existing, new and proposed</u> open spaces, sport and recreation facilities and green corridors.
PC92	69	CS17 / 8.190	<i>Amend second sentence:</i> The Government is still developing draft regulations to implement the Community Infrastructure Levy approach, <u>brought into force Community Infrastructure Levy (CIL) Regulations in April 2010, which were further amended in April 2011, and which will be indicate that CIL is optional for councils.</u>
PC93	69	CS17 / 8.191	<i>Add sentence to end of paragraph:</i> Therefore the Council will adopt a standard charge approach to the delivery of infrastructure. <u>This will run until 2014 at which time pooled contributions will not be possible under CIL regulations. At this time the Council will move to a CIL type approach.</u>

Ref	Page	Policy/ Paragraph	Suggested Change
PC94	70	POLICY CS17 Delivering Infrastructur e	<i>Amend final bullet list in policy:</i> <i>Third bullet:</i> <ul style="list-style-type: none"> measures to increase east-west capacity in the transport system to ease congestion (including a Wet Dock Crossing); <i>Fifth bullet:</i> <ul style="list-style-type: none"> strategic green infrastructure <u>including a country park</u>;
PC95	71	CS17 / 8.199	Strategic infrastructure needs at 2009 <u>2010</u> are broadly identified in the policy. ...
PC96	72	CS17 / 8.206	... and key partners such as the Local Strategic Partnership, Haven Gateway Partnership, utilities companies, Highways Agency, <u>Suffolk County Council</u> and the Environment Agency.
PC97	73	CS18 / 8.207	<i>Delete end of final sentence:</i> Thus many existing communities in the vulnerable areas do not or will not have adequate flood defences, and further regeneration in central Ipswich at the Waterfront and in Ipswich Village depends on the delivery of improved defences to ensure that development will be safe for its users.
PC98	73	CS18 / 8.208	<i>Update clauses b. and c.:</i> b. raising the river walls on the east and west banks to the south of the Island Site – this is due to commence August <u>commenced in 2009</u> ; and c. installing a tidal flood barrier in the New Cut at the southern end of the Island Site – due 2012/2013 <u>2014</u> .
PC99	73	CS18 / 8.210	It is recognised that the tidal surge barrier is unlikely to be in place until 2013 <u>2014</u> , but the Council ...
PC100	74	CS18 / 8.214	<i>Delete final sentence of paragraph:</i> If the barrier is completed later than expected some sites in IP-One may need to be put back into a later phase of development.
PC101	74	CS18 / 8.215	<i>In lines 7 and 8:</i> ..., the Borough may not be able to meet its <u>Regional Spatial Strategy</u> growth targets to 2025 <u>2027</u> .
PC102	74	POLICY CS19 Provision of Health Services	<i>Amend the policy:</i> The Council supports the bringing together of health sector facilities onto the Heath Road Hospital site, provided that all the following criteria are satisfied: <ul style="list-style-type: none"> a. changes can be fully justified by patient and visitor needs; b. changes take account of anticipated population growth and other demographic changes that could impact on health service provision; and c. <u>Proposals for development at Heath Road shall be accompanied by a strategy is prepared for future development of the Heath Road site that includes a <u>satisfactory</u> travel plan and measures to address local car parking issues.</u> <p>In the case of the St Clement's Hospital site, the Council is satisfied that the above criteria can be complied with, <u>part of the site is no longer needed for health facilities</u>, subject to related health facilities being acceptably relocated first. A detailed site allocation for alternative use on 12.57ha of the site will be made in the Site Allocations and Policies document.</p>

Ref	Page	Policy/ Paragraph	Suggested Change
			<p>Where other sites currently in health use become surplus to requirements over the plan period, the Council will only permit their redevelopment for non health purposes provided a. and b. above are met and they are not needed for another community use serving the local area. The latter point would be determined with reference to the one Ipswich board.</p> <p>Proposals to develop additional, <u>new</u> local health facilities such as GP surgeries will be acceptable provided that they are located in or adjacent to the town centre or a district or local centre. Exceptions will only be permitted where the applicant can demonstrate to the Council's satisfaction that the location would be fully accessible by all modes of transport, and would serve the patients or fill a gap in existing provision more effectively than any other better located and realistically available site</p>
PC103	75	CS19 / 8.221	<p><i>Amend latter part of paragraph:</i></p> <p>The re-allocation of the site will be dealt with through the Site Allocations and Policies development plan document. The Strategic Housing Land Availability Assessment 2009 identified this as a site that would be appropriate (in part at least) for a housing allocation. The Strategic Housing Land Availability Assessment 2009 identified this as a site that would be appropriate (in part at least) for a housing allocation for approximately 350 homes. Accordingly, the reallocation of the site for these purposes will be dealt with through the Site Allocations and Policies development plan document.</p>
PC104	76	CS20 Section heading	<p><i>Re-name section:</i></p> <p>East West Transport Capacity <u>Key Transport Proposals</u></p>
PC105	76	CS20 / 8.225	<p><i>Move original paragraph and replace with 8.226:</i></p> <p>A key objective of the Council is to improve the pedestrian and cycle accessibility between key nodes in the central area, two of which are the Central Shopping Area and the Waterfront. It is recognised that better pedestrian crossings and other measures could improve the linkages between the shopping area and the Waterfront, and a number of such crossings are already planned.</p>
PC106	76	CS20 / 8.226	<p><i>Move original paragraph and replace with 8.236 incorporating additional text:</i></p> <p>Public transport is an important part of the current and future transport packages and therefore the Council continues to support the 'Ipswich: Transport Fit for the 21st Century' scheme. More details on these proposals will be included in the IP-One Area Action Plan. The Council will look to close the Waterfront Northern Quays route to general traffic but retain limited access, e.g. for public transport and <u>appropriate operational use by Waterfront businesses</u>. The reduction in cars using the route along the Northern Quays will help to enhance the area as a pedestrian environment and a visitor attraction.</p>
PC107	76	CS20 / 8.226	<p><i>Insert new paragraph 8.227 after 8.226, relocated from 8.237:</i></p> <p>The Felixstowe to Nuneaton rail line is part of the Trans-European Network and there are long-standing proposals to upgrade this route - particularly to enable greater rail based freight movements from Felixstowe port. Currently all freight trains from Felixstowe need to come into or go through Ipswich station. The 'Bacon Chord' near Hadleigh Road, would be a short piece of new track that would enable trains to go direct from Felixstowe onto the Peterborough line without having to go into Ipswich station.</p>
PC108	76	CS20 /	<p><i>Move original paragraph.</i></p>

Ref	Page	Policy/ Paragraph	Suggested Change
		8.227	
PC109	76	CS20 / 8.228	<i>Move original paragraph.</i>
PC110	76	POLICY CS20 East-West Transport Capacity	<p>POLICY CS20: KEY TRANSPORT PROPOSALS EAST-WEST TRANSPORT CAPACITY</p> <p>The Council supports the 'Ipswich: Transport Fit for the 21st Century' scheme, which aims to reduce dependency on the private car by 15% within the lifetime of the Plan. This will improve bus station provision, passenger information, shuttle bus provision and pedestrian links between the Central Shopping Area, the railway station and Waterfront. In the longer term, and to assist with addressing issues in the Star Lane gyratory, the Council also supports the provision of significant alternative east-west transport capacity. To this end, it will, where it can be justified, make a case for a package of measures including a Wet Dock Crossing and traffic management schemes to be included within the next review of the local transport plan, in order to:</p> <ul style="list-style-type: none"> a. enable improvements to pedestrian and cycle routes between the Waterfront and the historic core of the town by subsequently reducing capacity on the Star Lane gyratory; b. enable the development of the Island Site for which access improvements, but not necessarily a Wet Dock Crossing, would be a prerequisite; c. enable the linking of high quality walking and cycling routes around the entire Waterfront area; and d. provide an alternative route for east-west movements which, along with appropriate traffic management schemes, would help to relieve congestion and air quality issues in the Gyratory, which in turn will support the town's economy and health. <p>In addition to this, the Council will actively encourage key partners to investigate the possibility of a northern bypass, to address the issue of:</p> <ul style="list-style-type: none"> (i) central east-west movement; (ii) movements within and around the north of Ipswich; and (iii) the capacity of the A14, particularly around the Orwell Bridge. <p>The Council also supports the completion of the upgrading of the Felixstowe to Nuneaton rail line. To assist with this the Council will protect, for rail use, the line of the 'Bacon Chord' near Hadleigh Road, Ipswich.</p> <p>In the short term the Council will look to close the Waterfront Northern Quays route to general traffic, maintaining access only for pick up/drop off and the shuttle bus.</p>
PC111	77	CS20 / 8.229	<p><i>Renumber as paragraph 8.228 to follow the policy, and amend:</i></p> <p>The Local Transport Plan (LTP) is a five-year programme of transport works prepared by the Highway Authority. It is used to set out a strategic overview of transportation needs, and an implementation plan. The current LTP covers the period 2011 to 2031. does not include a Wet Dock Crossing and is under review to look at the next planning period 2011 to 2016.</p>
PC112	77	CS20 / 8.230	<p><i>Renumber as paragraph 8.229 and amend:</i></p> <p>The Council supports Although the thrust of current national and local policy on transport <u>which is on</u> travel demand management, 7 which the Council supports, the Council also considers that in this case there are other factors in favour of this short length of new road. These are listed in the policy.</p>
PC113	77	CS20 / 8.230 (new)	<p><i>Relocate and renumber paragraph 8.225 to 8.230:</i></p> <p>There are concerns about highway capacity in the town centre,</p>

Ref	Page	Policy/ Paragraph	Suggested Change
			particularly within the Star Lane area. These capacity implications are closely linked to issues associated with the wider transport network - including the A14 and the Orwell Bridge.
PC114	77	CS20 / 8.231	<i>Relocate and renumber paragraph 8.231 to 8.233:</i> Detailed proposals, including those for the Star Lane gyratory, will be included in the IP-One Area Action Plan.
PC115	77	CS20 / 8.231 (new)	<i>Relocate and renumber paragraph 8.227 to 8.231:</i> The Council and partners commissioned a study to advise on the Gyratory, which reported in 2007 (the Ipswich Waterfront Study). The consultants advised that the two lanes of traffic should be reduced to one in both an easterly and westerly direction.
PC116	77	CS20 / 8.232	<i>Relocate and renumber paragraph 8.232 to 8.234:</i> The delivery of a Wet Dock crossing (i.e. a new road linking Holywells Road/Duke Street with Hawes Street) is a long term prospect and it is as yet uncertain. It is recognised that it would only be likely to happen if the Island site comes forward for redevelopment. Potential funding sources include: <ul style="list-style-type: none"> • LTP funding; <ul style="list-style-type: none"> • Growth Point funding - the possibility of the route is flagged up in the Haven Gateway Integrated Development Plan; • developer contributions through standard charges for infrastructure delivery (see Policy CS17); and • part funding from any Island Site development.
PC117	77	CS20 / 8.232 (new)	<i>Relocate text from policy to new explanatory paragraph, with amendments:</i> In the longer term, and to assist with addressing issues in the Star Lane gyratory, the Council also supports the provision of significant alternative east-west transport capacity. To this end, it will, where it can be justified, <u>continue to</u> make a case for a package of measures including a Wet Dock Crossing and traffic management schemes to be included within <u>each version</u> the next review of the Local € T r ansport € P lan , in order to: <ol style="list-style-type: none"> a. enable improvements to pedestrian and cycle routes between the Waterfront and the historic core of the town by subsequently reducing capacity on the Star Lane gyratory; b. enable the development of the Island Site for which access improvements, but not necessarily a Wet Dock Crossing, would be a prerequisite; c. enable the linking of high quality walking and cycling routes around the entire Waterfront area; and d. provide an alternative route for east-west movements which, along with appropriate traffic management schemes, would help to relieve congestion and air quality issues in the Gyratory, which in turn will support the town's economy and health.
PC118	77	CS20 / 8.233	<i>Relocate and renumber paragraph 8.233 to 8.236:</i> At a minimum, a road bridge from the west bank to the Island site and a pedestrian and cycle bridge across the Wet Dock lock gates to the east bank will be required to enable any significant development on the Island.
PC119	77	CS20 / 8.234	<i>Relocate and renumber paragraph 8.234 to 8.237:</i> In any event, the Council would resist any significant reduction of road capacity on the gyratory without the prior provision of either

Ref	Page	Policy/ Paragraph	Suggested Change
			some alternative capacity (e.g. the Wet Dock Crossing) or significant and successful travel demand management measures.
PC120	77	CS20 / 8.235	<p><i>Relocate and renumber paragraph 8.235 to 8.238, with amendments:</i></p> <p>This alternative capacity could also be provided via a northern bypass of the town. <u>The Council will actively encourage key partners to investigate the possibility of a northern bypass, to address the issue of:</u></p> <ul style="list-style-type: none"> (i) <u>central east-west movement;</u> (ii) <u>movements within and around the north of Ipswich; and</u> (iii) <u>the capacity of the A14, particularly around the Orwell Bridge.</u> <p>The Council will work with neighbouring authorities and Suffolk County Council to ensure that the merits and delivery options for some form of northern bypass are fully investigated. It is recognised that any such route would be within the Suffolk Coastal District Council and Mid Suffolk District Council areas (i.e. not between any possible Northern Fringe development -Policy CS10 - and Westerfield village) and therefore it is not practical to include such a route within this Strategy. However, the Council will encourage those authorities, together with Suffolk County Council and other interested parties, to actively investigate such a route, and would be prepared to contribute to any such investigation. In the event of any Northern Fringe development taking place (Policy CS10), it would be appropriate for the developer(s) to contribute towards any northern bypass. This would be addressed within the Supplementary Planning Documents referred to in Policies CS10 and CS17.</p>
PC121	77	CS20 / 8.235 (new)	<p><i>Relocate and renumber paragraph 8.228 to 8.235:</i></p> <p>The Island site in the Wet Dock is a key site in relation to the Waterfront regeneration. However, access to the Island is limited and therefore some form of additional access would be needed to bring the site forward for redevelopment.</p>
PC122	77	CS20 / 8.236	<i>Paragraph relocated and renumbered to 8.226.</i>
PC123	77	CS20 / 8.236 (new)	<p><i>Relocate and renumber paragraph 8.233 to 8.236:</i></p> <p>At a minimum, a road bridge from the west bank to the Island site and a pedestrian and cycle bridge across the Wet Dock lock gates to the east bank will be required to enable any significant development on the Island.</p>
PC124	77	CS20 / 8.237	<i>Paragraph relocated and renumbered to 8.227.</i>
PC125	78	CS20 / 8.238	<i>Paragraph renumbered as 8.239.</i>
PC126	78	CS20 / 8.239	<i>Paragraph renumbered as 8.240.</i>
CHAPTER 9 DEVELOPMENT CONTROL POLICIES			
PC127	79 & 81	Chapter title	Rename as Development Management Policies
PC128	81	POLICY DC1 Sustainable Development	Format: Arrange policy and table 4 so that the table reads more obviously as part of the policy.
PC129	82	9.6 (DC1)	<i>Delete the word 'proposed' in the first line:</i> The proposed policy ...
PC130	84	POLICY DC2	<i>Insert word:</i>

Ref	Page	Policy/ Paragraph	Suggested Change
		Decentralised Renewable or Low Carbon Energy	... 15% of their energy <u>requirements</u> from decentralised ...
PC131	84	9.18 (DC2)	<i>Add to the end of the final sentence:</i> ... the 17% regional target for 2020 and <u>national targets</u> .
PC132	85	9.26 (DC3)	Paragraph number is repeated – delete second 9.26 as below: 9.26
PC133	87	POLICY DC4 Development and Flood Risk	<i>Amend clause a:</i> a. it reduces <u>does not increase</u> the overall risk of ...
PC134	87	Table 5 (DC4)	<i>First row – add:</i> ... <u>site-specific</u> Flood Risk Assessment (FRA).
PC135	88	9.32 (DC4)	<i>Add the following sentence to the end of the Paragraph:</i> <u>Highly vulnerable development will not be permitted in Flood Zone 3a.</u>
PC136	88	9.33 (DC4)	<i>Amend as follows:</i> The draft Ipswich <u>Level 2 SFRA provides the necessary information to help facilitate</u> identifies permissible land uses on sites to facilitate the sequential approach and part c of the PPS25 Exception test and also provides necessary information for the exception test. Site-specific Flood Risk Assessments (FRAs) are required for all development in Flood Zones 2 and 3, and for all sites over 1 ha in size. The SFRA also provides additional guidance and information for on locations where site-specific Flood Risk Assessments (FRAs) will be required as part of the development process. This includes certain sites in Flood Zone 1, which may be less than 1 ha. The SFRA also considers the effects of development on local flooding and minor watercourses and identifies mitigation measures including SUDS.
PC137	88	9.34 (DC4)	<i>Add the following sentence to the end of Paragraph 9.34:</i> <u>Layout and form of buildings and roads must be designed around SUDS bearing in mind SUDS should be sited in lower areas, but preferably close to source, making use of topography.</u>
PC138	88	9.36 (DC4)	<i>At the beginning of the paragraph add a hyphen as follows:</i> Site-specific FRAs ...
PC139	88	9.37 (DC4)	<i>Amend Paragraph 9.37 to read:</i> SUDS standards and policies are currently set out in the Council's Drainage and Flood Defence Policy (although these standards may be rewritten and incorporated as a supplementary planning document). In the future it is expected that National Standards will be followed. Other standards, such as recommended floor levels, are set out by the Environment Agency, and in PPS25 and its companion guide.
PC140	88	9.40 (DC4)	<i>Re-locate Paragraph 9.40 to Paragraph 9.38 and re-number it. New text is shown below:</i> <u>The Council's Level 2 SFRA provides information relevant to both the existing tidal/fluvial defences at 2011 and also to the completed defences, with the proposed barrier in place. In each case the SFRA provides data on residual risks taking account of flood depth and the velocity of floodwater. The preparation of many site-specific</u>

Ref	Page	Policy/ Paragraph	Suggested Change
			<u>FRAs can make use of mapped risks from the new SFRA. However in some instances, site-specific FRAs will still need to include detailed flood modelling to ascertain the flood risk.</u>
PC141	88	9.40 (DC4)	<i>Delete former Paragraph 9.40 (now re-numbered 9.38)</i> The Council is intending to update its SFRA to Level 2, to take account of the proposed tidal/fluviial defences and to provide data on residual risks taking account flood depth and the velocity of floodwater. Once the final stages of the defence are under construction (planned 2011-2013) the preparation of some site specific FRAs will be simplified, as they can make use of mapped risks from the new SFRA. In some instances, site specific FRAs will still need to include detailed flood modelling to ascertain the flood risk.
PC142	88	9.39	<i>Amend Paragraph 9.39 to read:</i> FRAs for proposals in Zones 2 and 3 need to clearly state the frequency of flooding in and around the site and, until the EA's flood defence <u>barrier strategy</u> is implemented, will need to assume <u>existing defences are in place</u> there are no defences in place (existing defences are below the 200-year flood level) . Alternatively a FRA could be presented assuming <u>the barrier is defences are in place</u> , however any planning permission would be conditioned to prevent construction until the final stages of the <u>barrier defences</u> is are assured <u>under construction</u> .
PC143	88	9.38 (DC4)	<i>Re-locate Paragraph 9.38 to Paragraph 9.40 and re-number it. New text is shown below:</i> <u>More vulnerable and less vulnerable development sited in Flood Zones 2 and 3a, as defined in PPS25 may be acceptable. However FRAs will be required to demonstrate that such developments will be 'safe' in accordance with the Safety Framework described in sections 16.2 and 16.3 of the Level 2 SFRA (to be detailed in a future SPD) and consider flood risk from other sources. The assessment will follow PPS25 and Annex E of PPS25. Planning permission will not be granted if submitted details do not comply with the Safety Framework. In addition, permissions should not be granted if emergency responders are concerned about their capabilities/plans.</u>
PC144	88	9.38 (DC4)	<i>Delete former Paragraph 9.38 (now re-numbered 9.40)</i> The Council and the Environment Agency (EA) have a Protocol on Safety for Less Vulnerable Developments sited in Flood Zones 2 & 3 as defined in PPS25. In Ipswich the Environment Agency's view is that non-residential development should remain safe in the event of a flood and residual risks should be tolerable. This general opinion may however be overridden by specific concerns expressed by the EA, emergency planners or services.
PC145	89	9.41 (DC4)	<i>Delete former Paragraph 9.41 (incorporated into new Paragraph 9.40)</i> The acceptability of residual risks identified in the proposed Level 2 SFRA and mitigation measures will be judged based on PPS25, any advice received from emergency planners or services and on Table 12.3 of DEFRA report FD2320. It is anticipated that low residual risk will be acceptable for more vulnerable development in Flood Zone 3.
PC146	89	New Paragraph to	<i>New Paragraph 9.41</i> <u>Basements or lowered ground levels around buildings will increase</u>

Ref	Page	Policy/ Paragraph	Suggested Change
		follow 9.40 (DC4)	<u>flood risk to people contrary to the aims of PPS25. Basements are particularly vulnerable to all types of flooding. Basement dwellings will not be permitted where the floor level is below the 0.1% AEP tide level in 100 years time. Basement dwellings will not be permitted in "Areas Susceptible to Surface Water flooding". Basements in Flood Zone 1 will only be permitted subject to adequate FRAs, which must address ground water, sewer and overland flood sources.</u>
PC147	89	New Paragraph to follow 9.40 (DC4)	<i>New Paragraph 9.42</i> <u>FRA's will be required for any land raising including impacts on Surface Water flood risk. No raising of ground levels should be permitted around the Wet Dock that would impede Surface Water flood paths from Bridge Street, Key Street, Fore Street and Coprolite Street to the Wet Dock.</u>
PC148	89	DC5 Urban Design Quality	<i>Amend policy clauses b., c., and g.:</i> b. areas which function better <u>well</u> and where possible integrate residential, working and community environments and integrate <u>fit</u> well with adjoining areas; c. the promotion of <u>safe and secure communities</u> community safety ; g. ensuring that new residential development incorporates cycle and waste storage ...
PC149	92	POLICY DC6 Tall Buildings	<i>In the first line:</i> Planning permission for tall buildings will only be granted ...
PC150	92	POLICY DC6	<i>Amend criterion c.:</i> c. <u>achieving a building of the highest architectural quality of the building</u> ;
PC151	92	POLICY DC6	<i>Add the following sentence to the end of the policy:</i> <u>In other locations within the Borough proposals for tall buildings may exceptionally be considered to be appropriate if it can be demonstrated satisfactorily that they satisfy criteria a. to j. of the policy and would not harm the character and appearance of the area.</u>
PC152	92	POLICY DC6	<i>Delete following policy criterion:</i> k. no adverse effect on the setting of listed buildings.
PC153	92	9.61 (DC6)	<i>Insert a space between above and mentioned as follows:</i> ... in detail in the above mentioned document ...
PC154	92	9.62 (DC6)	<i>Amend Paragraph 9.62</i> <u>The boundaries of the arc of land to which this policy applies will be identified in the IP-One Area Action Plan. Strategic views in and across central Ipswich will be identified in the IP-One Area Action Plan and the Ipswich Urban Characterisation Study.</u>
PC155	92	New Paragraph to follow 9.62 (DC6)	<i>New Paragraph 9.63</i> <u>The impact of any proposed tall building on listed buildings will be assessed under the provisions of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</u>
PC156	93	9.67 (DC8)	<i>In the first sentence amend:</i> ... is set out in PPGs 15 <u>PPS5</u> (Planning and <u>for</u> the Historic Environment) 2010 <u>and 16</u> (Archaeology and Planning) and the Planning (Listed Buildings and Conservation Areas) Act 1990.

Ref	Page	Policy/ Paragraph	Suggested Change
PC157	93	9.68 (DC8)	<i>Amend</i> PPG15 PPS5 gives general guidance ...
PC158	94	9.72 (DC9)	<i>In the first sentence amend:</i> The need for locally specific variations in guidance is limited given the clear government guidance in PPG16 PPS5, which sets out how archaeological interest should be evaluated and remains should be preserved in an urban setting and in the countryside.
PC159	96	POLICY DC11 Ipswich Skyline	<i>Amend policy title</i> <u>Central Ipswich Skyline</u>
PC160	96	POLICY DC11	<i>In the second sentence amend:</i> Developments will only be permitted where they do not seriously disrupt this setting, especially when viewed from sensitive locations <u>key view points</u> .
PC161	96	9.76 (DC11)	<i>In the second sentence amend:</i> The IP-One Area Action Plan <u>and the Ipswich Urban Characterisation Study</u> will identify <u>key view points and key strategic views</u> in relation to the wooded skyline around central Ipswich and sensitive locations . <u>Relevant policy guidance in respect of tall buildings can be found in policy DC6.</u>
PC162	96	POLICY DC12 Extensions to Dwellinghouses and the Provision of Ancillary Buildings	<i>Amend criterion a:</i> a. ensures that sufficient garden space is retained <u>would not result in more than approximately 50% of the useable private garden area of the original dwellinghouse being occupied by buildings;</u>
PC163	98	POLICY DC14 The Subdivision of Family Dwellings	<i>Amend criterion e:</i> e. would not result in the conversion of small or modest sized family houses such as those containing 3 bedrooms or fewer or having a floorspace of less than 100 sq.m.
PC164	99	POLICY DC15 Travel Demand Management	<i>Amend clause d:</i> ... safe and convenient access to public transport within 200 <u>400</u> metres of the development; and
PC165	100	POLICY DC16 Sustainable Transport Modes	<i>Amend clause a:</i> a. safe and convenient access to public transport within 200 <u>400</u> metres of the site; and
PC166	100	9.88 (DC16)	<i>Amend:</i> 9.83 <u>9.88</u>
PC167	100	9.96 (DC16)	<i>Amend:</i> ... providing good access to public transport within 200 <u>400</u> metres, should reduce reliance on the car especially at peak times.
PC168	101	POLICY DC17 Transport and Access	<i>Add sentence at end of policy to follow clause d.</i> <u>Applicants will be required to demonstrate how the development would improve provision and/or how any acceptable adverse impacts would be managed and mitigated.</u>

Ref	Page	Policy/ Paragraph	Suggested Change
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PC169	101	9.99 (DC17)	<i>Amend:</i> The Ipswich Definitive Map project <u>was published in July 2009 is currently working towards preparing a map</u> showing rights of way in Ipswich. <u>A Rights of Way Improvement Plan is now under preparation.</u>
PC170	102	POLICY DC18 Car Parking	<i>Amend policy:</i> The Council will require local parking standards to be complied with in all new development. These will comprise of a set of minimum and maximum parking standards for residential development, and maximum parking standards for non-residential uses. The Council <u>and</u> will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities. For residential schemes, <u>Outside the IP-One area, there will be minimum parking standards for residential development and</u> although a minimum standard is applicable, car parking must be designed so as not to dominate the development or street scene or to result in the inefficient use of land. <u>There will be</u> Reduced, maximum, standards of provision for residential development will apply within the IP-One Area, which has frequent and extensive public transport networks, and easy access to a wide range of employment, shopping, and other facilities. <u>Across the Borough there will be maximum parking standards for non-residential development.</u> A central car parking core will be defined in the town centre, through the IP-One Area Action Plan. Within the central car parking core, only operational car parking will be permitted in connection with non-residential development, so that the stock of long-stay parking is not increased. New non-residential long-stay car parks will not be permitted.
PC171	104	POLICY DC20 The Central Shopping Area	<i>In the third paragraph of the policy add:</i> ... specified below. <u>A2-A5 uses are defined in the Glossary.</u>
PC172	104	POLICY DC20	<i>Amend the first sentence of the second paragraph of the policy:</i> The Central Shopping Area comprises the Primary, Secondary and Specialist Shopping Areas, which will be defined in <u>through</u> the IP-One Area Action Plan.
PC173	104	9.109 (DC20)	<i>Amend the first sentence:</i> The designation of the Central Shopping Area, including the Primary, Secondary and Specialist Shopping Area boundaries, will be set out in <u>through</u> the IP-One Area Action Plan.
PC174	104	9.109 (DC20)	<i>Add sentence at end of the paragraph:</i> <u>The streets within the Central Shopping Area are broken down into 'shopping frontages' by the Council. The frontages usually consist of a continuous line of buildings fronting the street or pavement, segregated by intersecting streets.</u>

Ref	Page	Policy/ Paragraph	Suggested Change
PC175	105	POLICY DC21 District and Local Centres	<i>Amend clause a.</i> 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. In the case of food supermarkets, they should not exceed 1,500 sq. m in scale. The requirements of Planning Policy Statement 64 (PPS64) should be satisfied.
PC176	105	POLICY DC21	<i>Amend sub-clause c. i.</i> i. the unit is not especially <u>does not occupy a prominent position</u> in the Centre;
PC177	106	POLICY DC21	<i>Amend final sentence of policy:</i> If development takes place at Development of the Northern Fringe, in accordance with policy CS10 will require the provision of a new District Centre will also be required there.
PC178	106	9.116 (DC21)	<i>Amend:</i> Zonal maps for each District Centre to support community facilities within 400m straight-line distance will be shown in <u>defined through</u> the IP-One Area Action Plan and Site Allocations and Policies development plan document.
PC179	107	9.117 (DC21)	<i>Replace first sentence of paragraph:</i> The policy sets an upper limit on size of additional food shops of up to 1,500 sq. m. 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.
PC180	107	9.117 (DC21)	<i>Amend third sentence of the paragraph:</i> The applicant should also demonstrate that it can meet the requirements as set out in PPS6 <u>PPS4</u> , which covers the following points:
PC181	107	9.117 (DC21)	<i>Delete sub-clause a:</i> a. the need for development;
PC182	107	9.120 (DC21)	<i>Amend final sentence of paragraph:</i> If development takes place at Development of the Northern Fringe, in accordance with policy CS10 will require the provision of a new District Centre will also be required there.
PC183	108	9.122 (DC22)	<i>Amend first sentence:</i> This policy reflects <u>PPS64</u> , which identifies the main uses appropriate to a town centre.
PC184	108	9.122 (DC22)	<i>Add additional sentence at end of the paragraph:</i> <u>For the development of non-retail town centre uses outside the Town Centre, PPS4 shall apply.</u>
PC185	108	POLICY DC23 Major Retail Proposals Outside Defined Centres	<i>Amend policy:</i> Major retail proposals for more than 200 sq. m gross floorspace in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable under the terms of Planning Policy Statement 64 (<u>PPS64</u>). Particular regard should be given to particularly in terms of: a. the need for the development; b. a. the appropriate scale of development; c. b. the sequential approach; d. c. avoiding significant adverse impact on existing defined Centres; and

Ref	Page	Policy/ Paragraph	Suggested Change
			e- <u>d</u> . accessibility by a choice of means of transport.
PC186	108	9.125 (DC23)	<i>Amend paragraph 9.125:</i> The Ipswich Retail Study <u>2005</u> , as confirmed by the Retail and Commercial Leisure Study <u>2010</u> , indicates that there is no need or justification for further major out-of-town retailing in Ipswich.
PC187	108	9.126 (DC23)	<i>Delete second bullet of paragraph and amend subsequent bullets accordingly.</i> <ul style="list-style-type: none"> • secondly, to consider sites in town centre locations, outside the Central Shopping Area; • thirdly <u>secondly</u>, to consider sites in edge of centre locations; and • fourthly <u>thirdly</u>, to consider sites in out of centre locations.
PC188	109	9.127 (DC23)	<i>Delete paragraph:</i> PPS6 is currently under review in combination with Planning Policy Statement 4 (PPS4). Although the draft replacement combined PPS4 indicates the intention for a shift in emphasis away from proving quantitative need for major retail development to focusing on its impact, this guidance has not yet been adopted. Therefore the policy still reflects current national policy at the time of writing.
PC189	109	POLICY DC24 Loss of Residential Accommodation	<i>Delete policy and paragraphs 9.128 and 9.129 and the heading 'Proposals Involving the Loss of Housing Units'</i>
PC190	110	POLICY DC25 Affordable Housing	<i>Amend clause a:</i> <ul style="list-style-type: none"> a. is designed and built to <u>at least</u> the highest the <u>same</u> standards <u>as the market housing</u>, including the appropriate level of the Code for Sustainable Homes at the time;
PC191	110	POLICY DC25	<i>Amend penultimate paragraph in policy:</i> The appropriate type, size, <u>and mix and tenure</u> , will be determined by the findings of the Borough's <u>most up to date</u> Housing Needs Survey and Strategic Housing Market Assessment <u>for the time being</u> , which will be updated over time , and the particular characteristics of the site.
PC192	110	POLICY DC25	<i>Relocate final paragraph of policy to CS12 and incorporate additional wording:</i> The Council will only consider reducing the requirement for the proportion of affordable housing in an open market development where an independent assessment of the applicant's development costs is carried out at the applicant's expense, <u>which justifies a lower percentage figure on viability grounds</u> .
PC193	110	9.130 (DC25)	<i>Close bracket after SHMA in first sentence:</i> In formulating policy DC25 the Council has taken into consideration findings from the 2005 Housing Needs Survey and the 2008 Strategic Housing Market Assessment (SHMA).
PC194	110	9.130 (DC25)	<i>Amend second sentence:</i> In addition to the SHMA, a viability study was also carried out in 2008, which informed the Council's decision to seek 40% <u>35%</u> affordable housing on larger sites, and 20% affordable housing provision on smaller sites.

Ref	Page	Policy/ Paragraph	Suggested Change
PC195	110	9.131 (DC25)	<i>Amend first sentence:</i> The type and mix of affordable dwellings required will be as set out in the Council's Affordable Housing Position Statement; as updated from time to time.
PC196	110	9.132 (DC25)	<i>Delete paragraph.</i>
PC197	111	POLICY DC26 Protection of Employment Land	<i>Amend policy:</i> Sites and premises used and/or allocated for employment uses in <u>Use Classes B1 Business, B2 General Industry or B8 Storage and Distribution, as defined by the Use Classes Order 1987 (as amended)</u> will be safeguarded for that purpose. Permission for the conversion, change of use or redevelopment of <u>such business, general industrial or distribution sites or premises to non- Class B1, B2 and B8 purposes, as defined by the Use Classes Order 1987 (as amended)</u> , will only be permitted where: a. the proposed use is compatible with the surrounding uses; and b. it can be demonstrated to the Council's satisfaction that the alternative uses are <u>sui-generis employment-generating uses appropriate to the location</u> with no reasonable prospect of locating elsewhere within the Borough; or c. the existing use is generating unacceptable adverse environmental impact <u>it can be demonstrated to the Council's satisfaction that the proposed use is ancillary to and supports existing employment uses.</u>
PC198	111	9.133 (DC26)	<i>Amend final sentence of paragraph:</i> This excludes the main town centre uses as defined in PPS6 <u>PPS4</u> such as retail.
PC199	111	9.135 (DC26)	<i>Amend final sentence of paragraph:</i> Where employment uses are no longer appropriate to their surroundings or cannot reasonably expand further on their existing sites they will be encouraged to relocate within Employment Areas identified on the <u>adopted Local Plan Proposals Map (which will be updated alongside the Site Allocations and IP-One development plan documents).</u>
PC200	113	POLICY DC28 Non- residential uses in residential areas	<i>Amend clause a:</i> a. would not involve the loss of a dwelling unless the use provides a necessary community facility <u>or would have significant benefits to the local economy;</u>
PC201	113	DC28	<i>Amend clause b:</i> b. is compatible with the size and scale of housing in the surrounding area and would not have a harmful effect on <u>residential amenity that area</u> through traffic generation <u>or</u> and general activity as a result of excessive numbers of people calling at the premises throughout the day and night; and
PC202	113	9.142 (DC28)	<i>Add text to the end of paragraph.</i> <u>The significance of benefits to the local economy will be assessed on its merits, taking into account the number of dwellings lost and the number of jobs created or supported.</u>
PC203	114	POLICY DC30 Provision of New Open	<i>Amend final paragraph of policy:</i> The requirement will apply to <u>all affordable housing</u> schemes unless it can be demonstrated that this would lead to the scheme being unviable <u>and/or site-specific matters so justify.</u> In such cases, a

Ref	Page	Policy/ Paragraph	Suggested Change
		Spaces, Sport and Recreation Facilities	reduced level of provision will be negotiated with the applicant.
PC204	115	9.149 (DC30)	<i>In the second sentence add wording as shown below:</i> In high density developments (<u>defined in Policy DC31</u>) this will be 15%, to compensate for the fact that private amenity space tends to be more limited and to provide an attractive setting for the buildings.
PC205	116	POLICY DC31 The Density of Residential Development	<i>Amend clause e.</i> e. a different approach is demonstrated to better meet <u>all</u> housing needs in the area. ; or
PC206	116	POLICY DC31	<i>Delete clauses f. and g.</i>
PC207	118	POLICY DC32 Natural Environment	<i>Add heading:</i> <u>'Natural Environment'</u>
PC208	119	POLICY DC33 Community Facilities	<i>Add heading:</i> <u>'Community Facilities'</u>
PC209	119	9.161 (DC33)	<i>Amend second sentence of paragraph:</i> Local community facilities include: doctor and dentist surgeries, health centres, chemists, places of worship, meeting halls, public houses, post offices, and education facilities and police facilities.
PC210	119	9.163 (DC33)	<i>Delete reference to 'Buildings Schools for the Future'</i> Shared community spaces will be provided through initiatives such as Buildings Schools for the Future. Such facilities could bring together, the delivery of services such as schooling, local policing and safer neighbourhood teams, and health services. This approach would require the agreement of all the service providers.
CHAPTER 10 IMPLEMENTATION			
PC211	122	10.4 Bullet 4	<i>Amend first sentence of bullet point for Regional Cities East:</i> Regional Cities East (RCE) is an alliance of six cities and towns in the East of England: Ipswich, Colchester, Luton, Norwich, Peterborough and Southend (<u>previously</u> with support from key regional agencies including the East of England Development Agency).
PC212	123	10.5	<i>Amend bullet b:</i> b. the Council has worked with RCE and Haven Gateway partners to produce an Integrated Development Programme (IDP). The IDP is an implementation framework for growth and will act as the delivery plan for the Framework. The East of England Development Agency, Government Office for the East of England and the Department for Communities and Local Government are looking at IDPs to prioritise key infrastructure needs. It is anticipated that the regional agencies will use IDPs to prioritise their funding.
PC213	123	10.9	<i>Amend paragraph by adding text to the end:</i> The following table identifies the major pieces of infrastructure required to support growth . <u>In addition, support is indicated elsewhere in the plan for other pieces of infrastructure, such as a Wet Dock Crossing. However these are not prerequisites for development to take place.</u>

Ref	Page	Policy/ Paragraph	Suggested Change
PC214	124 & 125		<i>Amend Table 6: See attached document.</i>
PC215	126	10.12 – 10.19	<i>Delete paragraphs upon adoption of the plan.</i>
CHAPTER 11 KEY TARGETS ASSOCIATED WITH PART B			
PC216	127	Chapter 11 Objective 3	<i>Amend wording to correspond with Paragraph 6.8 Bullet 3: At least (a) 15,400 <u>14,000</u> new dwelling units shall be provided between 2001 and 2021 (18,720 to 2025 <u>18,200 by 2027</u>) in a manner that addresses identified local housing needs and provides a decent home for everyone, with at least 70% <u>60%</u> of them being on previous development land and at least 35% of them on <u>larger sites</u> being affordable homes; and (b) 18,000 additional jobs shall be provided in <u>the Ipswich Policy Area</u> between 2001 and 2025.</i>
PC217	127	Chapter 11 Objective 3	<i>Amend target: To deliver at least (a) 15,400 <u>14,000</u> homes <u>by 2021</u> and (b) 18,000 jobs by 2021<u>5</u>.</i>
PC218	128	Chapter 11 Objective 6	<i>Amend second bullet to correspond with Paragraph 6.8 Bullet 6: - additional east-west highway capacity should <u>could</u> be provided within the plan period ... Amend third bullet to correspond with Paragraph 6.8 Bullet 6: - Ipswich Borough Council aspires to an enhanced public transport system, such as guided bus, urban light railway, <u>or</u> trams. or monorail.</i>
PC219	129	Chapter 11 Objective 7	<i>Amend target: Implementation of the tidal surge barrier by the end of 2013 <u>2014</u>.</i>
PC220	129	Chapter 11 Objective 8	<i>Add target: <u>To increase tree canopy cover in the Borough to 15%.</u></i>
PC221	129	Chapter 11 Objective 12	<i>Amend Indicator 1: Joint working taking place through the IPA Board (<i>or other equivalent forum</i>) or the Haven Gateway Partnership.</i>
CHAPTER 12 MONITORING AND REVIEW			
PC222	131	12.1	<i>Amend wording: The Local Development Framework Annual Monitoring Report will review the progress of these arrangements as well as progress on delivering the major projects <u>and infrastructure requirements</u> outlined in Chapter 10, and performance against the targets set out in Chapter 11. <u>Delivery of jobs within the Ipswich Policy Area will be monitored through a joint monitoring process with other relevant authorities.</u></i>
PC223	131	12.3	<i>Amend wording: In the context of this document it is likely that its review would link to the production of the next version of the Regional Spatial Strategy, which is scheduled for adoption in 2011 and which will <u>look to the period to 2031</u> significant new evidence becoming available, and issues being identified through the Annual Monitoring Report, and it is therefore anticipated that a review will be commenced in <u>2012/2013</u>.</i>
APPENDICES			
PC224	134	Appendix 1	<i>Rename Policy CS20: Policy CS20: <u>East West Transport Capacity Key Transport Proposals</u></i>
PC225	136	Appendix 1	<i>Delete Policy DC24 (and renumber subsequent policies)</i>
PC226	136	Appendix 1	<i>Add policy titles to list: <u>Natural Environment</u> (for policy DC32) <u>Community Facilities</u> (for policy DC33)</i>
PC227	137 & 138	Appendix 2	<i>Replace references PPG15 and PPG16 with PPS5</i>

Ref	Page	Policy/ Paragraph	Suggested Change
PC228	140	Appendix 2	<i>In respect of H15 & H16 – Loss of Residential Use change Core Strategy Policy</i> <u>DC24 – Loss of Residential Accommodation</u> <u>DC28 – Non-residential uses in residential areas</u>
PC229	137	Appendix 2	<i>Add sentence to end of introductory paragraph:</i> <u>Elements of the Saved Local Plan Policies may also be carried forward into other development plan documents.</u>
PC230	143	Appendix 4	<i>Add the following two district centres to the list of the numbering of centres:</i> <u>48 Duke Street – addition of a new District Centre</u> <u>49 Sproughton Road – addition of a new District Centre</u>
PC231	144	Appendix 5	<i>Amend Transport fourth bullet:</i> <ul style="list-style-type: none"> • <u>Pedestrian/cycle routes including public rights of way</u>
PC232	145	Appendix 5	<i>Amend Community and Community Safety first bullet:</i> <ul style="list-style-type: none"> • <u>Safer Neighbourhoods Teams and policing</u>
PC233	147	Appendix 7	<i>Add definition of Biodiversity Action Plan (BAP)</i> <u>It is the UK Government's response to signing the Convention on Biological Diversity (CBD) at the 1992 Rio Earth Summit. The plan sets out a programme for conserving the UK's biodiversity, at national and local levels. The Suffolk Local Biodiversity Action Plan (Suffolk LBAP) is applicable for the county of Suffolk.</u>
PC234	148	Appendix 7	<i>Update CABE entry:</i> <u>CABE was until 31st March 2011 a statutory body sponsored by the Government. On 1st April 2011 it was merged with the Design Council, to become an advisor on design in business innovation and the built environment.</u> CABE is a statutory body sponsored by the Department for Culture, Media and Sport (DCMS) and funded by them and the Office of the Deputy Prime Minister (ODPM).
PC235	150	Appendix 7	<i>Update LDD entry by deleting reference to the Statement of Community Involvement</i> A general term for a document in the Local Development Framework. It includes the Core Strategy and Policies and other development plan documents, the Statement of Community Involvement , and supplementary planning documents.
PC236	153	Appendix 7	<i>Amend SPD entry:</i> A local development document that provides further detail on policies in the development plan documents or of saved local plan policies. They do not have development plan status.
PC237	153	Appendix 7	<i>Add definition of town centre uses</i> <u>Town Centre Uses</u> <u>Town Centre uses are defined in Planning Policy Statement 4 (PPS4) and include retail, leisure, entertainment, intensive sport and recreation, offices, arts, culture and tourism uses.</u>
PC238		Appendix 7	<i>Add definition of Open space, sport, and recreational facilities</i> <u>Open space, sport, and recreational facilities</u> <u>These are shown in Table 810 of Appendix 6</u>
PC239		Appendix 7	<i>Add definition of high, medium and low density in accordance with Policy DC31</i> <u>Density of residential development</u> <u>High density refers to new housing development of at least 90 dwellings per hectare (dph) (the average will be taken as 110 dph).</u> <u>Medium density refers to new housing development of at least 40 dph (the average will be taken as 45 dph). Low density refers to new housing development under 40 dph (the average will be taken as 35 dph).</u>
PC240		Appendix 7	<i>Define key workers in accordance with PPS3</i> <u>Key Worker</u> <u>The Government's definition of key workers includes those groups eligible for the Key Worker Living programme and others employed</u>

Ref	Page	Policy/ Paragraph	Suggested Change
			<u>within the public sector (ie outside of this programme) identified by the Regional Housing Board for assistance.</u>
PC241		Appendix 7	<i>Delete the Building Schools for the Future definition</i>
PC242		Whole plan	The Council proposes to change all the references from PPS6 to PPS4.
PC243		Whole plan	The Council will correct any outstanding spelling mistakes and typographical errors at the time the plan is published.

DIAGRAM 3: The Ipswich Key Diagram

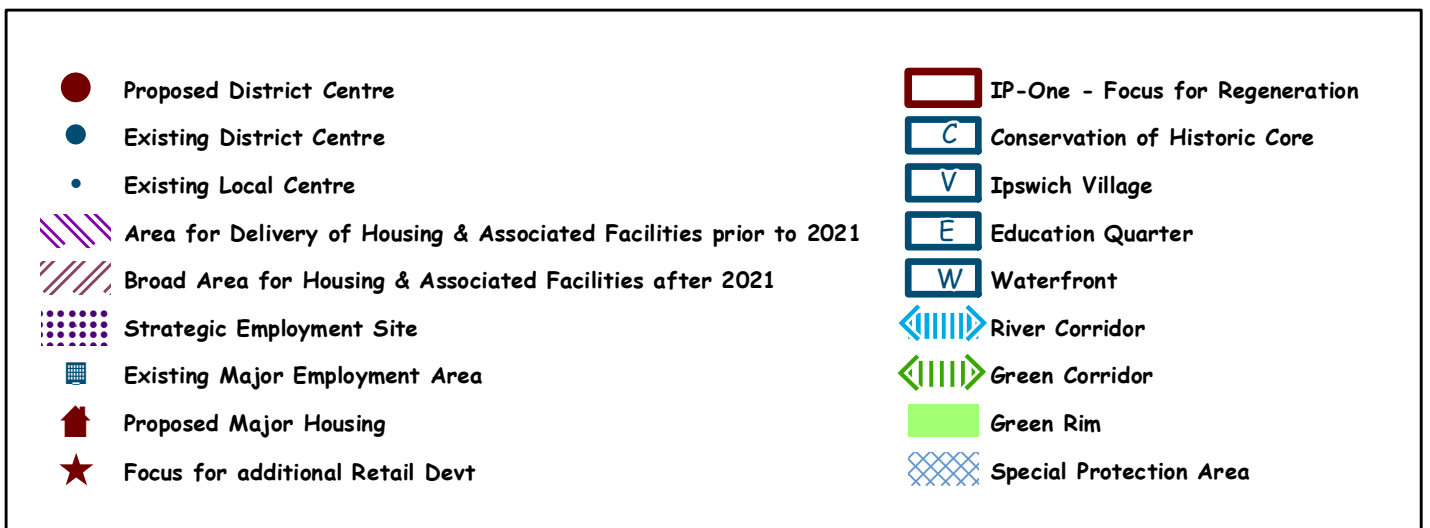
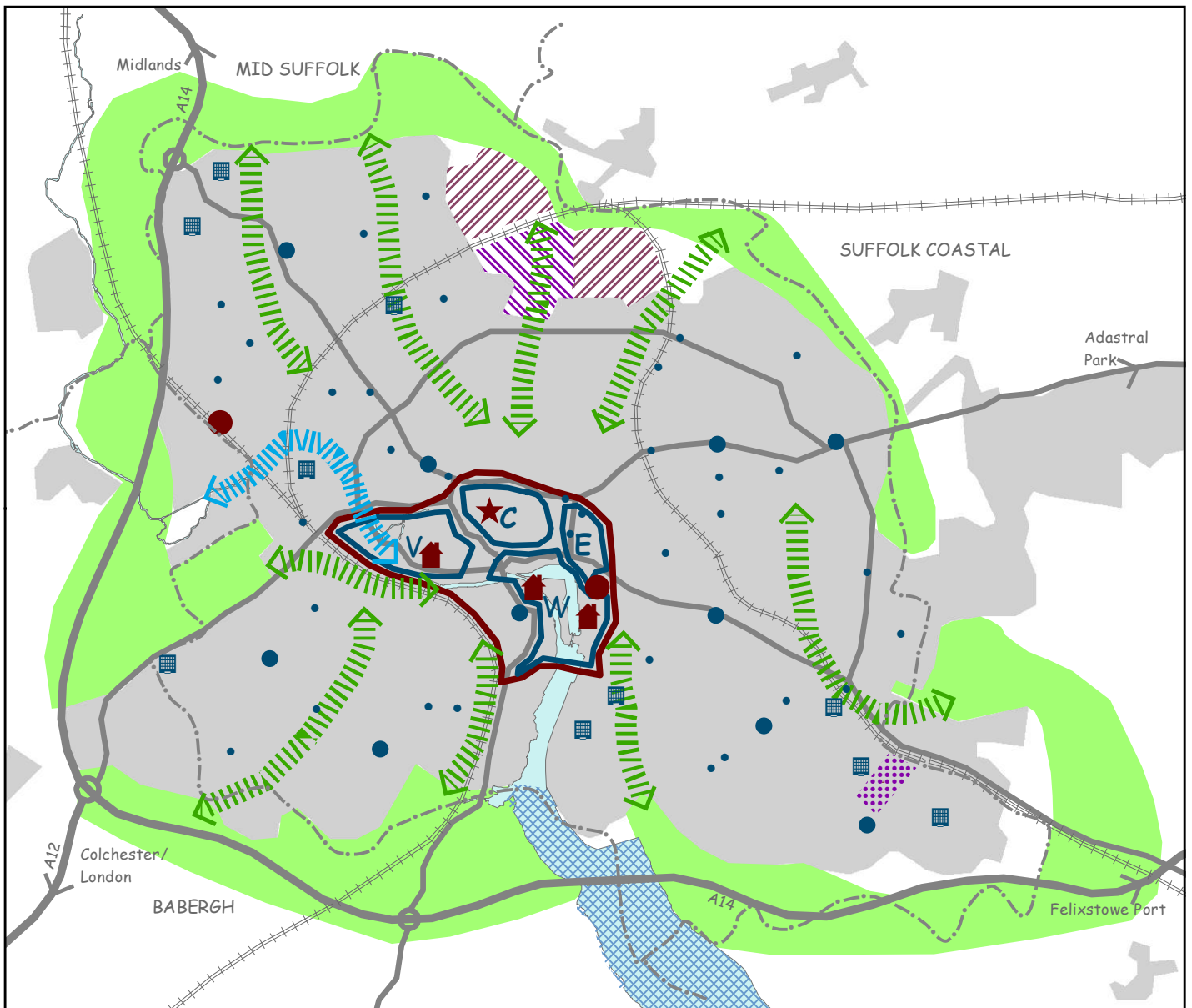


TABLE 68

PC214

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Expected Cost	Funding Sources	Completion Target
Ipswich Flood Defence Management Strategy	Continued regeneration through mixed use developments within the Flood Risk zones in IP-One	Environment Agency	£50m	Defra, Growth Point Funding	2013 2014
Ipswich: Fit for the 21st Century	Accommodating the housing and job growth targets. General levels of growth will increase travel demand which needs to be managed	Highways Authority (+)	£27m	DfT via Local Transport Plan	2013
Wet Deck Crossing	To enable the better linking of the shopping core and the Waterfront across the Star Lane Gyratory by reducing its capacity; partly to deliver the Island Site through improved access; and to enable general growth levels to be accommodated.	Highways Authority (+)	£28m	DfT via Local Transport Plan and developer contributions	2018
Ipswich Northern Bypass (*) (~)	Supporting east-west movement, movements within and around north Ipswich and the capacity of the A14.	Highways Authority (+)	£90m	DfT via Local Transport Plan and developer contributions	2016
Need for new sites for additional Primary (& possibly Secondary) school provision in east, west and possibly north Ipswich - sites to be identified through IP-One or Site Allocations DPDs	The delivery of residential development across east, west and possibly north Ipswich including at the Waterfront	Education Authority (+)	£10m	LA and developer contributions	2012
Green infrastructure: - green 'rim' around Ipswich - country park	Delivering growth, mitigating impacts on the SPA, and enhancing the Borough's green infrastructure network	Haven Gateway Partnership	N/a	Growth Point Funding <u>Developer contributions</u>	2021

Proposal	What aspect of the strategy depends on the proposal	Lead Delivery Body / Bodies	Expected Cost	Funding Sources	Completion Target
A14 Capacity Improvements (~)	Supports jobs growth by ensuring Ipswich remains highly accessible	Highways Agency	N/a	Highways Agency	2016
New primary substation at Turret Lane	Development in the town centre in support of the urban renaissance strategy	EDF Energy UK Power Networks	N/a	EDF energy; UK Power Networks	2021
New sports, leisure and recreation facilities - replacement or refurbishment of swimming pool / leisure complex - possible rationalisation of sports facilities at Gainsborough Sports Centre - Ipswich Definitive Map Project <u>Rights of Way Improvement Plan</u>	Supporting growth, enhancing health and quality of life, and supporting greener lifestyles and green transport	IBC and private sector plus Highways Authority (+) for the Definitive Map <u>Rights of Way Improvement Plan</u>	N/a	Growth Point Funding; Building Schools for the Future;	Need and delivery still under investigation
Additional park and ride	Improving accessibility and allowing potential relocation of central bus depots to release sites.	Highways Authority (+)	N/a	DfT via Local Transport Plan and developer contributions	2025
UCS Phase III	UCS	Various	N/a	HEFCE and others	2016
Community facilities - shared space facilities at: - the Waterfront - Chantry	Supporting growth and sustainable neighbourhoods	LSP	N/a	BSF, Growth Point	2021

NOTES:

~~(+) Suffolk County Council are the high ways authority and the education authority but it should be recognised that by the planned adoption date of this document the situation may have changed as a result of local government reorganisation in Suffolk.~~

~~(*) As set out in Policy CS20, the Council believes the potential for a northern bypass should be properly considered – that does not automatically mean that the Council will end up supporting any proposals for such a bypass. The date given is a target for the issue to be fully considered rather than for any subsequent bypass to be built.~~

~~(=) It should also be noted that any northern bypass and the A14 improvements are likely to be outside the Borough boundary but the Council believes that it would be appropriate to contribute to such improvements as they would be of direct benefit to Ipswich.~~

~~It is possible that only the Wet Dock Crossing or a northern bypass would be needed.~~