



# Phase 2

## Health Impact Assessment

*“Hybrid Application - Full Planning Permission for the means of external access/egress to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works.”*

**Land off Humber Doucy Lane, Ipswich**

**On Behalf of**

**Barratt David Wilson Homes and Hopkins Homes**

**February 2024**

**Our Ref: C23109**

**Phase 2** PLANNING & DEVELOPMENT LIMITED

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## Quality Assurance

**Site Name:** Land off Humber Doucy Lane, Ipswich

**Client Name:** Barratt David Wilson Homes and Hopkins Homes

**Type of Report:** Health Impact Assessment

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# 1 Introduction

1.1 This Health Impact Assessment (HIA) has been prepared by Phase 2 Planning & Development Ltd on behalf of Barratt David Wilson Homes and Hopkins Homes, hereafter referred to as the Applicant, to accompany a hybrid planning application for residential development and associated infrastructure/non-residential floorspace. The application site comprises approximately 31.5 hectares of land and is allocated for residential development Policy ISPA4 the Ipswich Borough Council Local Plan and under Policy SCLP12.24 of the East Suffolk District Local Plan.

1.2 The description of development is as follows:

*“Hybrid Application - Full Planning Permission for the means of external access/egress to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works.”*

1.3 The proposed development the subject of this Outline Planning Application is described in more detail in Section 2 of this assessment.

## Health Impact Assessment

1.4 This Health Impact Assessment (HIA) has been undertaken to meet the requirements of Ipswich Borough Council’s validation checklist and East Suffolk Council’s validation checklist, which both require a Health Impact Assessment to be provided for all developments exceeding 100 dwellings.

1.5 There are three types of health impact assessment:

- Desktop Assessment: This uses existing knowledge and evidence, often using checklists and provides a broad overview of potential impacts;
- A Rapid Assessment: This provides a more focussed assessment of health impacts and identifies mitigation and enhancement measures; and
- A Full Assessment: Involving comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement.

1.6 This report represents the findings of a Rapid Health Impact Assessment. It provides an assessment against the HUDU Planning for Health Rapid Health Impact Assessment Tool<sup>1</sup>.

1.7 Section 2 provides a brief description of the proposed development. Section 3 sets out the proposed methodology. Section 4 sets out the key health issues for the area and Section 5 assesses the proposed development against the HUDU rapid assessment tool. Section 6 provides a summary and recommendations.

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## 2 The Proposed Development

### Existing Site Context

- 2.1 The Site lies to the north-east of Humber Doucy Lane, on the outskirts of Ipswich, approximately 3km north-east of Ipswich Town Centre. It extends across the administrative boundaries of Ipswich Borough Council (IBC) and East Suffolk Council (ESC).
- 2.2 The Site comprises three parcels of land referred totalling 31.52 hectares. These parcels are referred to as the main parcel, southern parcel and western parcel. The main parcel comprises approximately 27.2 hectares of mainly arable land of which 9.74 hectares is located within ESC and the remainder is located within IBC.
- 2.3 The southern parcel comprises approximately 3.97 hectares of land entirely located within Ipswich Borough Council. This parcel is partly in agricultural use, and partly in use as additional playing pitches for the adjoining Ipswich Rugby Club (albeit consent for playing pitch use has actually expired).
- 2.4 The western parcel comprises a small area of 0.35 hectares land largely overgrown with vegetation to the west of Westerfield House, lying between Tuddenham Road and Humber Doucy Lane. This parcel forms part of the application site in case there is any requirement to undertake highway improvements at the Humber Doucy Lane/Tuddenham Road junction.
- 2.5 The site is allocated under both the Ipswich Borough Council Local Plan and the East Suffolk Local Plan. Policy ISPA4 of the Ipswich Borough Council Core Strategy and Policies Development Plan Document Review (which also covers a rectangular parcel to the west of Humber Doucy Lane) is identified for 449 dwellings and associated infrastructure, with 60% allocated for housing and 40% for secondary uses comprising open space and other green and community infrastructure. Policy SCLP12.24 of the East Suffolk (Suffolk Coastal) Local Plan allocates the land for 150 dwellings and associated infrastructure.

### Proposed Land Uses

- 2.6 The planning application proposes up to 660 dwellings. The dwellings will generally be low rise (i.e. between 1 and 2.5 storeys, up to a maximum of 3 storeys where appropriate).
- 2.7 The non-residential built floorspace will comprise uses within Class E and/F2(b) (e.g. potentially a small-scale retail use, café, service use and or community use).
- 2.8 The scheme will make provision for a variety of green infrastructure ‘typologies’, providing a range of spaces for public use, recreation, play, youth and biodiversity. These include amenity green space, parks and gardens, natural and semi-natural space, provision for children’s playspace and provision for young people.

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## 3 Methodology

### Screening

- 3.1 A standalone Health Impact Assessment has been undertaken to meet Ipswich Borough Council and East Suffolk Council's validation requirements, which both require a Health Impact Assessment for all developments exceeding 100 dwellings.

### Scoping

- 3.2 The validation checklists do not stipulate the type of HIA required. As such, in accordance with Diagram 6 of the Town and Country Planning Association Public Health in Planning Good Practice Guide<sup>ii</sup>, it was determined a 'Rapid Health Impact Assessment' should be undertaken given the type and scale of the development.
- 3.3 Ipswich validation checklist states that the HIA should: enable an overall reduction in health inequalities and be based on evidence and align with local health and wellbeing needs and priorities. It also highlights that the assessment should be proportionate to the significance of impact of the local plan or project and highlights opportunities for engagement with public health teams.
- 3.4 The East Suffolk Validations Checklist highlights that the Health Impact assessment should identify ways in which the positive impacts for health can be enhanced, and ways to avoid or minimise (mitigate) negative impacts.
- 3.5 A Health Impact Assessment was prepared for the Local Plan based on the HUDU model. On this basis, the HUDU Planning for Health Rapid Health Impact Assessment Tool<sup>iii</sup> has formed the basis of the assessment.
- 3.6 This assessment has been undertaken under the following themes set out under HUDU:
- Access to healthcare services and other social infrastructure;
  - Access to open space and nature;
  - Air quality, noise and neighbourhood amenity;
  - Accessibility and active travel;
  - Crime reduction and community safety;
  - Access to healthy food;
  - Access to work and training;
  - Social cohesion and lifetime neighbourhoods;
  - Minimising the use of resource; and
  - Climate change.

### Baseline Conditions

- 3.7 A desktop review has been undertaken of baseline information to identify key health issues within the local community. Information has been collated from the following sources:
- Public Health England's Local Authority Profile<sup>iv</sup>;
  - Health Impact Assessment Final Draft Ipswich Local Plan 2018 -2036<sup>v</sup>;
  - Core20PLUS5 in Suffolk, Suffolk Annual Public Health Report 2022<sup>vi</sup>;

- 
- Census 2021<sup>vii</sup>, together with Census 2011<sup>viii</sup> where relevant to determine any trends over time; and
  - Ipswich Place Based Needs Assessment.

### Appraisal

- 3.8 An appraisal has been undertaken to determine the effect of the proposed development on health both during the construction and operation of the Proposed Development specifically with consideration to key issues within Ipswich and East Suffolk.
- 3.9 This appraisal uses information and assessments undertaken by a number of the project's technical consultants, including PRP, the masterplanners and architecture, CSA environmental, the project's landscape and ecologists, RSK, the highway and civil engineers, JS Lewis Ltd, the project's sustainability consultant, 24 Acoustics, and Air Quality Consulting.
- 3.10 It should be noted that this HIA is a qualitative assessment. Due to the nature of the health determinants considered, and the outline nature of the application it is not possible to quantify the significance of the effects. The assessment however seeks to identify whether effects are likely to be positive, neutral, negative or uncertain.
- 3.11 The completed HUDU Rapid Assessment matrix is presented in section 5.

### Identification Mitigation and Enhancements and Requirement for Monitoring

- 3.12 Where the HIA has identified negative impacts on health the appraisal has identified mitigation measures and set out how these would be secured and any requirement for monitoring.

### Summary and Conclusions

- 3.13 A summary has been undertaken of the findings, and any recommended mitigation and enhancement measures.

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## 4 Key Health Issues in Ipswich Borough Council

- 4.1 A review has been undertaken of the key health issues in Ipswich using Census data 2011 and 2021, alongside, Public Health England's Local Authority Profile, Public Health Suffolk's place-based needs assessment for Ipswich and The State of Suffolk Report together with information from Office of National Statistics including Census data from 2011 and 2021.
- 4.2 The area of the Site in Ipswich is within Rushmere Ward, with the majority of the Site covered by Ipswich 004E Lower Super Output Area (LSOA), with the area in East Suffolk within Carlford and Fynn Valley ward (primarily within East Suffolk 024E Lower Super Output Area) within Rushmere St Andrew Parish.

### Demographics

- 4.3 The Census 2021 identifies that the population of Ipswich, has increased by 4.7%, from around 133,400 in 2011 to 139,700 in 2021, more slowly compared to East of England which has seen the largest population growth across the UK and increased by 8.3% or 488,000 more residents. This compares to an overall increase across England of 6.6%, where the population grew by nearly 3.5 million to 56,489,800. In East Suffolk, the population size has increased by 2.6%, from around 239,600 in 2011 to 245,900 in 2021.

### Age

- 4.4 The Census 2021 shown in Table 4.1 highlights that Ipswich has a slightly higher proportion of children and a slightly lower proportion of older people compared to East of England and England as a whole, whilst East Suffolk has a lower proportion of children and a much higher proportion of older people, particularly exaggerated in East Suffolk 024E resulting in a lower working age population than East of England and England as a whole. There is also a lower working age population within Ipswich 004E, as a result of a higher proportion of children and higher proportion of older people compared to regional and national levels.

Age	Ipswich 004E	East Suffolk 024E	Ipswich	East Suffolk	East (%)	England (%)
0-19	25.1	18.7	24.6	19.9	23.0	23.1
20 to 64	52.3	50.0	59.0	52.5	57.4	58.5
>65	23.0	31.4	16.6	27.8	19.6	18.4

Table 4.1: Age Profile (Source: ONS- Census 2021 -Nomis – TS007A<sup>ix</sup>)

- 4.5 Estimated population projections show that there is a growing elderly population across Suffolk. The Suffolk in 20 years – Healthy, Wealthy and Wise report<sup>x</sup> highlights that in Suffolk (and England as a whole) the population aged 65 and over is growing more rapidly than the working age population. It states that *“Suffolk’s total population is projected to increase by nearly 8% over the next 20 years; but the number of older people increases by 38%”*. It also highlights *“The biggest growth will be numbers of people aged 75 and over. The number of people aged 85 and over is expected to be around 50,000 - almost double 2022.”*

- 4.6 It also identifies that *“The working age population is expected to DECLINE slightly – with implications for the local economy...”*.
- 4.7 It does however highlight that Ipswich’s population is younger with a median age of 38 compared to 49 in East Suffolk.

### Ethnic Diversity

- 4.8 The Census data shown in Table 4.2 highlights that Ipswich is slightly less diverse than the national average, with 84.3% of the population in Ipswich being white compared to 81% nationally, but is more diverse than the regional average. East Suffolk, however, is significantly less diverse than regional and national averages.

Ethnicity	Ipswich 004E (%)	East Suffolk 024E (%)	Ipswich (%)	East Suffolk (%)	East (%)	England (%)
Asian	7.1	0.8	5.5	1.4	6.4	9.6
Black	3.1	0.9	3.5	0.6	2.9	4.2
Mixed	2.6	2.7	4.6	1.5	2.8	3.0
White	84.1	95.4	84.3	96.2	86.5	81.0
Other ethnic group	3.0	0.2	2.1	0.4	1.4	2.2

Table 4.2: Ethnicity (Source: ONS- Census 2021 – Nomis – TS021<sup>xi</sup>)

### Life Expectancy

- 4.9 Table 4.3 shows life expectancy at birth for residents in Ipswich between 2018 and 2020 is 79.4 years for males and 83.0 for females which is slightly lower than the regional and national average. Life expectancy within East Suffolk is slightly higher, similar to regional life expectancy and slightly better than national life expectancy.

Life Expectancy (2016-2018)	Ipswich	East Suffolk	East of England	England
Male	79.4	80.4	80.2	79.6
Female	83.0	83.8	83.8	83.2

Table 4.3: Life Expectancy (Source: Ipswich and East Suffolk Health Profile 2019<sup>xii</sup>)

- 4.10 The health profile also highlights that life expectancy is 8.8 years lower for men and 6.5 years lower for women in the most deprived areas of Ipswich compared to the least deprived areas and 7.3 years lower for men and 5.4 years lower for women in the most deprived areas of East Suffolk than in the least deprived areas, whilst this is a significant difference, this is lower than the national average of 9.7 years for men and 7.9 years for women.

## Adult Health

- 4.11 Adult health in Ipswich is generally similar to the national average. However, there was a higher rate of mortality from cancer than the average in 2021, with 132 deaths per 100,000 population compared to 115 regionally and 121.5 nationally. Within East Suffolk, adult health is generally better than average. However, suicide rates are significantly worse in East Suffolk, with 14.3 suicides per 100,000 population, compared to 9.6 in Ipswich, 9.0 regionally and 10.3 nationally.
- 4.12 In addition, emergency hospital admissions for intentional self-harm is higher in both Ipswich and East Suffolk, with 210.1 hospital stays per 100,000 population in Ipswich and 196.4 in East Suffolk compared to 163.9 for England and 145.0 within East of England.
- 4.13 Alcohol-related conditions are also higher in Ipswich with 632 stays per 100,000 population compared to 457 regionally and 494 nationally and 488 within East Suffolk.
- 4.14 Smoking prevalence is slightly higher within both East Suffolk and Ipswich at 15.2% in East Suffolk and 13.7% in Ipswich compared to 13.2% regionally and 12.7% nationally.
- 4.15 Within Ipswich, levels of overweight and obese adults is 68.1%, which is higher than regional and national levels (63.9 % and 63.8% respectively), with physical activity similar to national levels (67.1% compared to 67.3% nationally). Within East Suffolk there are similar rates of adults classified as overweight or obese (63.9%) compared to regional and national, with high rates of physically active adults at 73.2%, compared to 68% regionally and 67.3% nationally.
- 4.16 There are lower rates of dementia diagnosis than national levels.
- 4.17 Hospital admissions for violent crime in East Suffolk and Ipswich was better in 2019-2021 than regional and national levels, with 31.4 admissions per 100,000 population in Ipswich and 11.7 in East Suffolk, compared to 32.7 regionally and 41 nationally.
- 4.18 Table 4.5 sets out the effect of long-term health and disabilities.

	Ipswich 004E (%)	East Suffolk 024E (%)	Ipswich (%)	East Suffolk	East (%)	England (%)
Disabled - Day-to-day activities limited a lot	11.1	7.5	8.5	7.3	6.6	7.3
Disabled - Day-to-day activities limited a little	9.7	10.1	12.2	10.7	10.0	10.0
Not Disabled but has long term health condition	6.4	8.2	8.1	7.2	7.2	6.8
Not Disabled and no long term health condition	72.7	74.2	71.2	74.8	76.1	75.9

Table 4.4: Effect of Long-term health and disability on activity (Source: ONS- Census 2021 - Nomis<sup>xiii</sup>)

- 4.19 Table 4.4 shows that a higher percentage of residents are disabled within Ipswich (almost 21% of residents), compared to 17.3% nationally, particularly exaggerated within Ipswich 004E, where

some 11.1% are limited a lot by disability. This may be attributed to the existing care home within this area. East Suffolk has levels of disability more in line with national levels.

4.20 Table 4.5 sets out the general health indicators based on the 2021 Census.

	Ipswich 004E	East Suffolk 024E	Ipswich	East Suffolk	East (%)	England (%)
Very good health	44.3	47.0	43.3	45.6	48.3	48.5
Good health	33.7	35.0	36.0	35.8	34.6	33.7
Fair health	14.2	12.9	15.0	13.5	12.5	12.7
Bad Health	6.0	3.8	4.5	4.0	3.6	4.0
Very Bad Health	1.8	1.3	1.2	1.1	1.0	1.2

Table 4.5: General Health (Source: ONS- Census 2021 – Nomis – TS037<sup>xiv</sup>)

4.21 Table 4.5 shows that a slightly lower proportion of residents within East Suffolk consider themselves to be in good or very good health and slightly higher proportion consider themselves to be in bad or very bad health compared to regional or national averages. Within Ipswich, the data shows similar proportions to regional and national averages. However, within Ipswich 004E, a lower proportion of residents describe themselves as in good or very good health, and a higher proportion describe themselves as in bad or very bad health. This may be attributed to the existing care home within this area.

## Child Health

4.22 The Local Authority Health profile identifies that approximately 23.8% of children in Ipswich live in relative low-income families, and 15.9% in East Suffolk compared to 14.3% in East of England and 19.9% nationally. Lower levels of low-income families are however located within lower layer super output areas in which the Site is largely located (14.6% for Ipswich 004E and 11.3% for Suffolk Coastal 009 E).

4.23 The Local Authority Health Profile identifies that infant health is generally better in East Suffolk than Ipswich with lower levels of infant mortality in East Suffolk (2.6 per 1,000) and higher levels in Ipswich (4.3 per 1,000), compared to 3.4 within East of England and 3.9 nationally). However, fewer people smoke at time of birth in Ipswich (6.3%) with similar levels in East Suffolk (8.9%) compared to national levels (87.8%). Smoking during pregnancy is however falling.

4.24 Significantly higher rates of under 18 conception have been identified in Ipswich (20.1 per 1,000 females) compared to 11.0 per 1,000 in East of England and 13.1 per 1,000 nationally. East Suffolk however is more in line with average rates at 12.5 per 1,000.

4.25 The National Childhood Measurement Programme (NCMP), 2022/2023 identified that the proportion of Year Six children who are obese is higher in Ipswich (25.2%) compared to 20.6% in

East of England and 22.7% nationally, whilst levels of obesity in East Suffolk are similar to regional and national level at 21.6%.

- 4.26 Compared to national average, GCSE attainment are lower in both Ipswich and East Suffolk than the East of England and England average, with the average attainment 8 score of 45 in Ipswich and 46.4 in East Suffolk compared to 48.9 in East of England and 48.7 in England.

### Deprivation

- 4.27 In 2019, Ipswich ranked 71 out of 317 local authorities and is therefore within the most deprived 25% of local authorities.
- 4.28 In 2019, the Site fell into Ipswich 004E and Suffolk Coastal 009E Lower Layer Super Output Areas (LSOA). Ipswich 004E is ranked 13,941 out of 32,844 LSOA's in England (among the 50% most deprived neighbourhood). Suffolk Coastal 009E is ranked 21,058 out of 32,844 LSOAs in England, making it amongst the 40% least deprived neighbourhoods in the country.

### Housing

- 4.29 The World Health Organisation highlights<sup>xv</sup> that *“the quality of housing has major implications for people’s health. Poor housing is associated with a wide range of health conditions such as respiratory diseases including asthma, cardiovascular diseases, injuries, mental health and infectious diseases”*.
- 4.30 Table 4.6 sets out population and number of households based on Census 2021, to ascertain average household size.

Tenure	Ipswich 004E (%)	East Suffolk LSOA 024E (%)	Ipswich (%)	East Suffolk (%)	East of England (%)	England (%)
Population 2021	1786	1,606	139,642	246,058	6,335,074	56,490,048
No. of Households	720	705	59,507	110,747	2,628,782	23,436,085
Average residents per household	2.48	2.28	2.35	2.22	2.41	2.41

Table 4.6: Average household size (Census 2021 –TS001<sup>xvi</sup> and TS041<sup>xvii</sup>)

- 4.31 The Census 2021 results identified that in 2021, there were approximately 139,632 residents within Ipswich, and 59,507 households, averaging approximately 2.35 residents per household, lower than the average for the East of England and England of approximately 2.41.
- 4.32 However, average population size in LSOA 004E is 2.48, higher than the regional and national average.
- 4.33 The average household size has increased in Ipswich since the Census 2011, when average household size was 2.28.

4.34 Average household size in 2021 in East Suffolk was 2.22 and 2.28 in LSOA East Suffolk 024E, significantly lower than the national average.

Tenure	Ipswich 004E	East Suffolk 024E	Ipswich (%)		East Suffolk (%)	East (%)		England (%)	
	2021	2021	2011	2021	2021	2011	2021	2011	2021
Owned (with and without mortgage)	66.2	83.0	56.7	55.4	68.9	67.6	65.2	63.3	61.3
Shared ownership	0.1	0.1	0.6	0.6	0.4	0.7	1.0	0.8	1.0
Social rented	22.9	7.2	21.6	20.8	13.1	15.7	15.5	17.7	17.1
Private rented	10.1	9.6	19.9	23.0	17.6	14.7	18.2	16.8	20.5
Living rent free	0.7	0.0	1.2	0.2	0.1	1.3	0.1	1.3	0.1

Table 4.7: Tenure (Census 2011 and Census 2021)

- 4.35 Table 4.7 shows that a low proportion of residents within Ipswich 55.4% own their own home, compared to East of England (65.2%) and England (61.3%). However, there is a high proportion of house ownership (68.9%) in East Suffolk, and locally within LSOA's Ipswich 004E (66.2%) and East Suffolk 024E (82.0%). Within Ipswich, and specifically, within LSOA Ipswich 004E, there is a high proportion of households in social housing (20.8% and 22.9% respectively), compared to 15.5% in East of England and 17.1% nationally. However, within East Suffolk there is a lower proportion of social rented housing (13.1% within East Suffolk, and 7.2% within LSOA East Suffolk 024E).
- 4.36 Table 4.7 also shows a general trend towards reduced home ownership and reduced social renting, with an increase in private renting since 2011. No comparable data was available for East Suffolk, due to the change in boundaries since 2011.

#### Housing Waiting List

- 4.37 The Place Needs Assessment shows there are 11,291 households in Suffolk on the waiting list in 2022/2023.<sup>xviii</sup> This compares to 10,435 households on the housing waiting list in Suffolk during 2018, suggesting an increase in housing need.
- 4.38 Of the 11,291 households 2,907 are within Ipswich and 4,501 households are in East Suffolk.
- 4.39 Almost half of the households on the Ipswich and East Suffolk waiting list (44.6%; 3,304 households) required single bedroom accommodation, while 1 in 3 (33.1%; 2,449 households) required two-bedroom accommodation. Almost 1 in 5 (18.7%; 1,388 household) required three or more bedrooms.
- 4.40 Of these households, 2,707 (36%) are in a reasonable preference group, with a high level of housing need. Of those, almost half (48.7%) require to move on medical or welfare grounds, with a further 27.4% occupying insanitary or overcrowded housing, and a further 9.9% are homeless.

## Education and Qualifications

4.41 Table 4.9 shows qualifications of residents in Ipswich, East Suffolk, East of England and England.

Qualifications	LSOA Ipswich 004E	LSOA East Suffolk 024E	Ipswich	East Suffolk	East		England	
	2021	2021	2021	2021	2011	2021	2011	2021
No qualifications	21.7	19.8	21.7	19.4	22.5	18.1	22.5	18.1
Highest level of qualification: Level 1 qualifications	9.5	8.8	12.0	11.3	14.6	10.8	13.3	9.7
Highest level of qualification: Level 2 qualifications	15.8	15.3	14.4	15.0	16.2	14.4	15.2	13.3
Highest level of qualification: Level 3 qualifications	15.4	16.2	16.3	16.9	11.8	16.8	12.4	16.9
Highest level of qualification: Level 4 qualifications and above	28.0	28.1	26.2	27.6	25.7	31.6	27.4	33.9
Highest level of qualification: Apprenticeship	5.3	7.8	6.3	6.9	3.7	5.5	3.6	5.3
Highest level of qualification: Other qualifications	4.4	4.0	3.1	2.9	5.4	2.8	5.7	2.8

Table 4.8: Qualifications (Census 2011 and 2021)

4.42 As shown in Table 4.8, residents in East Suffolk and particularly in Ipswich are less qualified than the regional and national average with 21.7% having no qualifications in Ipswich and 19.4% in East Suffolk, compared to 18.1 regionally and nationally, and fewer having level 4 qualifications (26.2 in Ipswich and 27.6% in East Suffolk, compared to 31.6% in East and 33.9% nationally. The table also shows that there is an upward trend in qualifications since 2011.

4.43 A review has been undertaken of capacity and number of pupils on roll at all primary schools within 2km, together with all secondary schools within 5km as shown in Table 4.9.

	Name of School	Distance	Net Capacity	Current Roll 2020/2021	Existing Surplus / Deficit
<b>Primary</b>	Rushmere Hall Primary School	250m	630	611	19
	Sidegate Primary School	1.18km	655	655	0
	St John's Cof E Primary School	1.18km	210	207	3
	St Mary's Catholic Primary School	1.62 km	210	213	-3

	<b>Total Primary within 2km</b>		<b>1705</b>	<b>1686</b>	<b>19</b>
<b>Secondary</b>	Northgate High School	600m	1777	1732	45
	St Alban's Catholic High School	1.39km	1020	1023	-3
	Copleston High School	2.1km	1780	1887	-107
	Ormiston Endeavour Academy	3.32	900	557	343
	Kesgrave High School	3.85km	1850	1875	-25
	Stoke High School Ormiston Academy	4.3km	860	742	118
	Ipswich Academy	4.8km	1080	1001	79
	<b>Total Secondary within 5km</b>		<b>9267</b>	<b>8817</b>	<b>450</b>

Table 4.9 Capacity of Local Schools (Source – Get Information About Schools<sup>xix</sup>)

- 4.44 The site is in close proximity to local schools, with Rushmere Hall Primary School located less than 250m from the Southern parcel and Northgate High School located 600m from the boundary of the Site. The get-information on schools website<sup>xx</sup>, updated in January 2024 shows these schools are currently (2023-2024 school year) operating with a surplus of 19 places. In addition, the education report prepared has identified that the current forecasts indicate substantial primary education capacity will become available in existing schools over the next few years. Furthermore, the Ipswich Garden Suburb is proposing three new primary schools. One of which, would be located within Red House Park, within 2km of the Site.
- 4.45 Secondary school capacity is considered for a wider area, and existing capacity has been considered for schools within approximately 5km radius of the school. This indicates that there are over 450 surplus spaces within 5km of the site.
- 4.46 It is expected that the proposed development will make appropriate financial contributions towards any additional classroom space required, as primary, secondary and sixth form levels. The planned construction of three new primary schools and a new secondary school within the Ipswich Garden Suburb will make a positive contribution towards school places on the north-eastern side of the town.

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## Primary Healthcare

4.47 The following GP Surgeries are located within 3km of the Application Site boundary and the Application Site is within their catchment areas:

- Two Rivers Medical Practice - accepting new patients – 1.4km from site boundary;
- The Derby Road Practice - accepting new patients – 2.6 km from site boundary;
- Orchard Medical Practice accepting new patients – 2.6 km from site boundary;
- Felixstowe Road Medical practice - accepting new patients – 2.89 km from site boundary;
- and
- Ivory Road Medical Practice - accepting new patients – 2.86km from site boundary.

4.48 In addition, the Fonnereau neighbourhood within Ipswich Garden Suburb includes a district centre with permission for uses including a new health centre.

## Economic Activity

4.49 The most up-to-date source of data in relation to economic activity is the ONS, Annual Population Survey (October 2022 – Sept 2023). Table 4.8 shows economic activity for Ipswich, East Suffolk, the East of England and England.

	Ipswich (%)	East Suffolk (%)	East (%)	Great Britain (%)
Residents aged 16 to 64 years who are economically active *	85.2	83.9	80.8	78.8
Residents aged 16 to 64 years who are economically active and employed	83.7	83.2	77.7	75.8
Residents aged 16 to 64 years who are economically inactive ***	14.8	16.1	19.2	21.2
Residents aged 16 to 64 years who are unemployed	4.1	3.4	3.8	3.7

\*Includes people in part-time and full-time employment and those who are self-employed.

\*\*\*Includes people who are retired, students, looking after home or family, long-term sick or disabled, and other.

**Table 4.8: Economic Activity (% of Residents 16-64) (Source - ONS, Annual Population Survey)**

4.50 Over this period, 83.7% of residents in Ipswich and 83.2% between 16 and 64 were recorded as being economically active and employed, higher than that for the East of England and Great Britain. A lower proportion of residents (14.8% in Ipswich and 16.1% in East Suffolk) were economically inactive than the regional average (19.2%) and national average (21.2%). However, unemployment is higher in Ipswich (4.1%) and lower in East Suffolk (3.4%) than the regional and national averages of 3.8% and 3.7% respectively.

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### Key Issues:

4.51 The local authority health profile, identifies the following key health issues for the Borough:

- Life expectancy is 8.8 years lower for men and 6.5 years lower for women in the most deprived areas of Ipswich compared to the least deprived areas and 7.3 years lower for men and 5.4 years lower for women in the most deprived areas of East Suffolk;
- A higher teenage conception rate in Ipswich compared to East of England and England;
- A high percentage of children in low-income families in Ipswich (23.8%) compared to 14.3 % in East of England and 19.9% in England, although less of a key issue in East Suffolk;
- High rates of childhood obesity in Ipswich;
- A higher hospital admission rate for intentional self-harm in both Ipswich and East Suffolk, and higher suicide rates in East Suffolk than East of England and England average;
- A lower average GCSE attainment in both Ipswich and East Suffolk compared to regional and national average;
- Low levels of home ownership in Ipswich; and
- Increasing elderly population in Suffolk.

## 5 Appraisal

### Theme 1 Housing Quality and Design

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement/ Method of Securing
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	Yes <input checked="" type="checkbox"/> No N/A	The proposals will meet the Councils requirements in terms of M4(2) accessible and adaptable dwellings. The Ipswich Local Plan requirement is for 25% of dwellings and the East Suffolk requirement is for 50% to be to M4(2) standard.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Planning condition securing delivery
Does the proposal address the housing needs of older people, ie extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	Yes <input checked="" type="checkbox"/> No N/A	As set out above, a proportion of homes will be accessible and adaptable in accordance with Building Regulations M4(2). In addition, all key pedestrian routes will be suitable for all users including those in wheelchairs.  Street furniture is planned to be provided within open spaces, enabling less mobile people to rest.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Planning condition securing delivery of M4(2) homes.
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	Yes <input checked="" type="checkbox"/> No N/A	As identified above, the proposal will incorporate M4(2) dwellings, which, by definition, incorporate features that make a dwelling potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users. Features include step-free access and wall-mounted switches, socket outlets and other controls being reasonably accessible to people who have reduced reach.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Planning condition securing delivery
Does the proposal promote good design through layout and orientation, meeting internal space standards?	Yes <input checked="" type="checkbox"/> No N/A	Careful consideration will be given to layout and orientation at the detailed design stage with the following design principles applied: <ul style="list-style-type: none"> <li>• Ensure buildings are arranged to maximise natural surveillance of the public realm;</li> <li>• Inclusion of landscaped buffer to respect local character and adjacent listed buildings;</li> <li>• Retain the majority of trees forming focal features within the development;</li> <li>• Vary density and heights through the site to add character; and</li> </ul>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Good design to be secured at reserved matters stage.

		<ul style="list-style-type: none"> <li>All dwellings to meet the Nationally Described Space Standards (NDSS).</li> </ul>		
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	Yes <input checked="" type="checkbox"/> No N/A	<p>The application is largely submitted in outline and the housing mix is currently unknown. However, the Proposed development will provide up to 660 dwellings comprising a range of housing types and sizes including terraces, semi-detached and detached homes and some low-rise flats/apartments (maximum three storeys). It is envisaged that the dwellings will be predominantly two, three, four bedroom houses, with a much smaller proportion of one and five bedroom properties. It is anticipated that apartments will be provided in the denser parts of the site. Local need will be taken into consideration when establishing housing mix.</p> <p>It is proposed that a policy compliant level of affordable housing will be provided. The housing needs will be reviewed at reserved matters stage to ensure the proposed mix of unit sizes will assist in meeting identified local needs.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Affordable housing to be secured by S106 Legal Agreement.
Does the proposal contain homes that are highly energy efficient (eg a high SAP rating)?	Yes <input checked="" type="checkbox"/> No N/A	Reserved matters applications will address energy efficiency as a key consideration and the development is likely to have to comply with part L of Building Regulations, which is a demanding specification. The SAP rating of the new dwellings will be very much higher than the existing stock.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Detailed Energy Strategy to be prepared at Reserved Matters, secured by condition.

## Theme 2 Access to Healthcare, Education and Other Social Infrastructure

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement/ Method of Securing
Does the proposal retain or re-provide existing social infrastructure?	Yes <input checked="" type="checkbox"/> No N/A	Through the provision of a mix of uses, the development will be more sustainable than a single use development. Community assets including play areas, public open space, enhanced local pedestrian, cycle and bus routes will all add to the local social fabric and are direct social benefits of the scheme itself.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	To be secured by condition.
Does the proposal assess the impact on healthcare services?	Yes <input checked="" type="checkbox"/> No N/A	Based on 2.48 residents per dwelling (average population per dwelling in Ipswich 004E LSOA) and 660 dwellings, the proposed development creates a demand for 0.91 FTE GPs based on an average list size of 1800 patients per GP.	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	Financial contribution towards increasing capacity at offsite health facilities will be secured by condition and legal agreement.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	Yes No N/A <input checked="" type="checkbox"/>	N/A	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	
Does the proposal assess the capacity, location and accessibility of other social infrastructure, eg schools, social care and community facilities?	Yes <input checked="" type="checkbox"/> No N/A	<p>Rushmere Primary School is located less than 250 metres from the southern parcel, within a 10 minute walk from the centre of the site. Northgate High School is located 600 metres from the boundary of the Site within a 15 minute walk of the centre of the site.</p> <p>An education report has been undertaken reviewing the capacity of local schools. This indicates that substantial primary education capacity will become available within existing schools. This together with new primary schools within IGS is expected to meet the demand of the development.</p> <p>A new secondary school is proposed within Red House Park, which, once operational, will increase secondary school capacity in the area.</p> <p>The development will provide an early years centre, meeting the demand for early years education created by the development. In addition, 400 sq</p>	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	Financial contribution towards increasing education capacity will be secured by condition and legal agreement.

		<p>m (net) of non-residential floorspace is proposed falling within Use Class E and/or Use Class F2(b) to support the development.</p> <p>In addition, open space is proposed including a new green trail in line with planning policy, central park and playspace, assisting in meeting the deficit identified in north-west Ipswich.</p>		
Does the proposal explore opportunities for shared community use and co-location of services?	Yes No <input checked="" type="checkbox"/> N/A	The Site is largely residential, with supporting uses comprising early years centre together with 400sqm of non-residential uses. These will be located within the centre of the site fronting the central park, allowing the playspace to be utilised by the early years centre.	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	None required
Does the proposal contribute to meeting primary, secondary and post 19 education needs?	Yes <input checked="" type="checkbox"/> No N/A	An early year's facility is proposed to meet the demand arising from the development. It is expected that a financial contribution will be made to increasing off-site provision to cater for primary and secondary schooling.	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	Financial contribution towards increasing capacity will be secured by condition and legal agreement.

### Theme 3 Access to Open Space and Nature

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement/ Method of Securing
Does the proposal retain and enhance existing open and natural spaces?	Yes No N/A <input checked="" type="checkbox"/>	<p>The existing site is private arable land with limited rights of way. In line with policy, a green trail is proposed along the northeastern boundary of the Site, incorporating existing public rights of way. New housing will be set back from the Site boundary in order to create a transition to the wider rural countryside and respect the local landscape character.</p> <p>The design of the development has sought to retain features of ecological and landscape importance including trees. Tree and hedgerow loss will be minimised.</p> <p>It is proposed that a network of landscaped open spaces are provided as set out below, providing a range of landscape typologies including playspace, sustainable drainage features, amenity space, natural greenspace including a small community orchard.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Secured by planning condition/Section 106 Agreement
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	Yes <input checked="" type="checkbox"/> No N/A	<p>Around a third of the site will comprise open space and non-residential uses.</p> <p>Assessment of the open space in the area has revealed that there are deficiencies in terms of children's play, youth provision and parks and garden, whilst the outdoor sports within the northwest of Ipswich exceeds recommended levels. It is therefore proposed that the open space on this site will contribute to meeting the deficiency of playspace in the area.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Secured by planning condition
Does the proposal provide a range of play spaces for children and young people?	Yes <input checked="" type="checkbox"/> No N/A	The proposals at Humber Doucy Lane will provide playspace for children and young people including three LEAPs, a MUGA as well as informal playspaces for children including 'play on the way' features. This is of particular benefit in this part of Ipswich which has a shortage of existing playspaces.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Secured by planning condition
Does the proposal provide links between open and natural spaces and the	Yes <input checked="" type="checkbox"/> No N/A	The proposals incorporate a publicly accessible green trail which will contribute to the Council's desire to create a green rim around Ipswich in accordance with Policy DM10 and DM11 which will link with the open	Positive <input checked="" type="checkbox"/> Negative Neutral	Parameter plans secured by planning condition

public realm?		<p>countryside. A green trail is created which will link to public rights of way across the railway line towards the Fynn Valley.</p> <p>In addition, green links are provided between the residential parcels, providing habitat corridors as well as amenity spaces and informal playspace.</p>	Uncertain	
Are the open and natural spaces welcoming and safe and accessible for all?	Yes <input checked="" type="checkbox"/> No N/A	<p>The open spaces will be designed to be safe and accessible. The central open space and green links between residential parcels will be overlooked by residential properties and additionally the non-residential uses will overlook the central park.</p> <p>All primary routes, together with the proposed path within the green trail will be surfaced to be accessible to those in wheelchairs.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Further landscaping details at reserved matters stage secured by condition
Does the proposal set out how new open space will be managed and maintained?	Yes No N/A	Some of the formal recreation areas (e.g. LEAPs) may be offered to Parish Council. A management company will be responsible for maintaining remaining areas of the estate including trees and open spaces.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Secured by planning condition/Section 106.

## Theme 4 Air Quality, Noise and Neighbourhood Amenity

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement/ Method of Securing
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes <input checked="" type="checkbox"/> No N/A	<p>Measures such as the following would typically be implemented as part of a Construction Environmental Management Plan:</p> <ul style="list-style-type: none"> <li>• Provision of appropriate hoarding and / or fencing to reduce dust dispersion and restrict public access;</li> <li>• fitting equipment (particularly cutting, grinding or sawing) with dust control measures such as water sprays, wherever possible;</li> <li>• ensuring sand and other aggregates are damped down and covered or seeded;</li> <li>• ensuring that a road sweeper or other suitable provision is available to clean mud and other debris from wheels,</li> <li>• prohibiting fires on the Site;</li> <li>• ensuring vehicles entering and leaving the Site are securely covered; and</li> <li>• using a wheel wash system.</li> </ul>	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	A Construction Management Plan to be implemented and secured by planning condition, setting out measures to minimise noise, vibration and dust.
Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes <input checked="" type="checkbox"/> No N/A	<p>Once operational, no gas boilers are proposed. As such, air quality effects would primarily relate to traffic emissions, which may impact on air quality at existing residential properties along the affected road network.</p> <p>Air quality assessments have been undertaken which confirms that air quality conditions at the site are well below the air quality objectives and therefore acceptable. Furthermore, the assessment has demonstrated that emissions from additional traffic will have a negligible effect at existing receptors, with pollutant concentrations well below the objectives at all existing receptors in 2026.</p>	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	A Travel Plan and Construction Environmental Management Plan will be secured by planning condition.

Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes <input checked="" type="checkbox"/> No N/A	<p>Noise is known to be considered as a nuisance at a particular level and can impact on sleep and concentration with corresponding detrimental impact on health.</p> <p>During construction there is likely to be a short-term increase in noise as a result of construction activities effecting a small number of residents surrounding the Site. These impacts would be mitigated through the CEMP. This would typically include a number of measures including the hours of operation, working practices and construction methods.</p> <p>A buffer zone is proposed along the railway line to mitigate for noise and vibration from trains. Noise surveys undertaken have revealed that other than for a limited number of properties close to the external roads and the rugby club, no noise mitigation would be required. Mitigation required for the affected properties is standard in such situations.</p> <p>A traffic noise assessment has been undertaken to determine the effect arising from traffic noise associated with the development on surrounding receptors. This has highlighted that the effect both alone and cumulatively alongside Ipswich Garden Suburb would be negligible.</p>	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	<p>A CEMP would minimise impacts during the construction phase.</p> <p>A Travel Plan will be implemented to encourage sustainable travel secured by planning condition.</p> <p>Noise attenuation will be secured through appropriate planning conditions.</p>
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## Theme 5 Accessibility and Active Travel

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement/ Method of Securing
Does the proposal prioritise and encourage walking (such as through shared spaces?)	Yes <input checked="" type="checkbox"/> No N/A	The development will prioritise pedestrian and cyclists creating a pleasant, safe environment for all. The main spine road running through the area will accommodate for a bus route and prioritise pedestrians and cycle movements. Green corridors and tree-lined streets will connect the central space to the Green Trail and adjacent residential areas.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	A Travel Plan will be implemented to encourage sustainable travel secured by planning condition.
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes <input checked="" type="checkbox"/> No N/A	All residential properties, as well as the non-residential uses will be provided with appropriate cycle storage, determined at reserved matters stage.  In addition, dedicated cycle lanes are proposed along the spine road, and an additional route from Humber Doucy Lane, as well as along the southern boundary of the Site.  Furthermore, all roads through the development will be designed to encourage low vehicles speeds encouraging active travel, improving fitness, cardiovascular and mental health.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Cycle storage to be secured by condition.  A Travel Plan will be implemented to encourage sustainable travel secured by planning condition.
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes <input checked="" type="checkbox"/> No N/A	The proposal will be well connected, improving connectivity between existing communities and the open countryside, through the creation of the green trail within a landscaped buffer zone around the site, in accordance with the IBC policy as well as the creation of the green corridors and tree lined streets.  It is anticipated that key routes would comprise hard surfacing to ensure accessibility for all. Access to the countryside via green routes is expected to benefit physical and mental health.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Development to be built in accordance with parameter plans.  Landscaping strategy to be secured by condition

Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	Yes <input checked="" type="checkbox"/> No N/A	<p>The Spine comprises a two-way carriageway and caters for vehicles and cyclists. It will accommodate parallel footways, pedestrian crossings and traffic calming measures.</p> <p>Secondary routes and tertiary streets will include less formal traffic calming, with calming achieved through design features such as street trees and shared surfacing to prioritise pedestrians and cyclists.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Parameter plans secured by planning condition.
Is the proposal well connected to public transport, local services and facilities?	Yes <input checked="" type="checkbox"/> No N/A	<p>The site is well connected to public transport. There are bus links with the no. 70 and 70A passing the site, and an extended route for no. 59 proposed through the scheme, resulting in all dwellings being within easy walking distance from the bus route/nearest bus stop. In addition, Westerfield railway station is within 1.5km of the site with routes to Lowestoft, Felixstowe and central Ipswich. Access to this station will be improved through delivery of the Red House Park proposals.</p> <p>The Chartered Institution of Highways and Transportation (CHIT) document 'Providing for Journeys on Foot' recommends suggested acceptable walking distances of between 500m (6 minutes "Desirable") and 2km (25 minutes, "Preferred Maximum) for commuting and journeys to school.</p> <p>The local centre at Selkirk Road, providing convenience retail, is within a 15 minute walk of the site. Rushmere Primary School is located less than 250 metres from the southern parcel, within a 10 minute walk from the centre of the site. Northgate High School is located 600 metres from the boundary of the Site within a 15 minute walk of the centre of the site.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Parameter plans secured by planning condition.
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and	Yes <input checked="" type="checkbox"/> No N/A	<p>Parking provision will be in accordance with local parking standards. The proposals will encourage sustainable travel modes through overall design and travel planning.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	A Travel Plan will be implemented and secured by condition to discourage travel by private car.

travel plans measures?				
Does the proposal allow people with mobility problems or a disability to access buildings and places?	Yes <input checked="" type="checkbox"/> No N/A	<p>The framework plan has been designed to ensure inclusivity and equal access for all individuals, including those with disabilities. A key element is the development will include a comprehensive network of paths and routes throughout the masterplan suitable for the needs of individuals using mobility aids such as wheelchairs and walkers. These routes will be wide, even, and free from obstacles and may include features such as ramped access, tactile paving. Where required, inclusive amenities like accessible seating and signage to enhance usability for individuals with disabilities will be utilised.</p> <p>The non-residential buildings will be designed to ensure access for all. This includes incorporating accessible entrances, parking spaces, restrooms, and other facilities in compliance with relevant building regulations.</p> <p>In addition, as set out above, a proportion of all dwellings will be designed to be accessible and adaptable in accordance with Building Regulations M4(2) requirement and local planning policy.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Further detail at reserved matters stage. To be secured by planning condition.

## Theme 6 Crime Reduction and Community Safety

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement/ Method of Securing
Does the proposal incorporate elements to help design out crime?	Yes <input checked="" type="checkbox"/> No N/A	<p>As set out in the Design and Access Statement, the detailed layout of streets, buildings and landscape will be designed so that it avoids easy opportunities for crime and anti-social behaviour. The design will incorporate principles of secured by design.</p> <p>Key elements will include:</p> <ul style="list-style-type: none"> <li>• Strategically positioning homes to face open spaces, promoting passive surveillance deterring potential criminal activities through increased visibility, and overlooking the main open spaces, streets, and key pedestrian corridors;</li> <li>• Public routes and public spaces to be well defined with clear sightlines;</li> <li>• Appropriate lighting levels, to create a welcoming and secure atmosphere for pedestrians and cyclist, whilst minimising light pollution; and</li> <li>• Buildings to have 'defensible space' with a clearly defined boundary between private and public.</li> </ul> <p>Further detail to be provided at Reserved Matters Stage.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	To be secured by planning condition and addressed at Reserved Matters
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Yes <input checked="" type="checkbox"/> No N/A	<p>The development has been designed to prioritise pedestrian and cyclist movement, creating a pleasant and safe environment, with links to the surrounding community. The high-level concept framework plan focuses on creating outward-looking blocks that overlook greenspace, ensuring a seamless integration between the built environment and the natural surroundings helping to make people feel safe.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Detailed layout to ensure active frontages, ensuring good natural surveillance

Does the proposal include attractive, multi-use public spaces and buildings?	Yes <input checked="" type="checkbox"/> No N/A	The development is residential-led, however non-residential uses are also proposed along with areas of public open space. Open space has been to be multi-functional, providing recreation spaces, playspace as well as opportunities for biodiversity and visual amenity.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Detailed layout to ensure multi-use public spaces
Has engagement and consultation been carried out with the local community?	Yes <input checked="" type="checkbox"/> No N/A	<p>Engagement with the local community and stakeholders has played an important role in the design development. Public consultation was held at Rushmere St Andrew Parish Hall on 30<sup>th</sup> October 2023 and a website was also set up. Comments were sought in relation to the proposals.</p> <p>A second consultation event took place on 15<sup>th</sup> February 2024 to update local residents on the progress and changes to the scheme.</p> <p>The key issues raised and how they have been addressed are set out in the Statement of Community Involvement.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	N/A

## Theme 7 Access to Healthy Food

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement/ Method of Securing
Does the proposal facilitate the supply of local food, ie allotments, community farms and farmers' markets?	Yes <input checked="" type="checkbox"/> No N/A	Allotments are not proposed on site as there is a surplus of provision within the local area, with the nearest site located at Gretna Gardens, approximately 325m west of the boundary of the site.  However, as set out in the Design and Access Statement the extensive open spaces provide opportunity for a small community orchard within the southern parcel.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Landscaping details to be secured by condition
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Yes No N/A <input checked="" type="checkbox"/>	The proposals include up to 400sqm of non-residential floorspace under Class E, which could include retail such as a foodstore.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	None required. Whilst the effect is uncertain, no negative effects are predicted.
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area?	Yes <input checked="" type="checkbox"/> No N/A	The uses proposed do not include hot food takeaways, which are classed as sui generis.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	None required

## Theme 8 Access to Work and Training

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement / Method of Securing
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes <input checked="" type="checkbox"/> No N/A	Based on the house builders federation calculator, the construction of 660 homes is estimated to support the employment of approximately 2046 people during the construction phase including opportunity for training and apprenticeships.  Once completed, The Proposed Development is estimated to provide approximately 18* jobs within the early years centre, together with approximately 21 FTE jobs <sup>xxi</sup> associated with the proposed 400m <sup>2</sup> of non-residential floorspace (assuming an A1 use). In addition, based on a supplier multiplier effect at 1.1 as set out in the Additional Guide <sup>xxii</sup> , a further 4 jobs may be generated in the supply chain.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	None required, however use of apprentices would increase the qualifications people, a key issue locally.
Does the proposal provide childcare facilities?	Yes <input checked="" type="checkbox"/> No N/A	The development is estimated to generate demand for 57 early years places.** It is proposed that an early years facility will be provided on site, meeting the demand generated by the development.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Early years centre secured by condition
Does the proposal include managed and affordable workspace for local businesses?	Yes No <input checked="" type="checkbox"/> N/A	The development is residential led, with only a small amount of commercial/community space proposed.	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	None required
Does the proposal include opportunities for work for local people via local procurement arrangements?	Yes <input checked="" type="checkbox"/> No N/A	Construction procurement could provide additional local employment but the extent is uncertain.  The non-residential uses will also generate employment, which may provide job opportunities for local people. In particular, the early years centre may include a proportion of term-time only jobs benefitting local parents.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	None required

\* Assuming 60 place nursery, ratio of 1:4 for 50% of children and 1:8 for 50% of children, plus 50% for management, admin and kitchen staff and holiday/sick cover.

\*\* Based on the SCC pre-app response which outlined 51 early years pupils in relation to 599 dwellings (uplifted by 10% and rounded up to account for the 10% uplift in number of proposed dwellings)

## Theme 9 Social Cohesion and Lifetime Neighbourhoods

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement / Method of securing
Does the proposal connect with existing communities, ie layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	Yes <input checked="" type="checkbox"/> No N/A	<p>The development has been designed to create a walkable community with linkages to the existing communities and improve links to the open countryside, including a new green trail around the boundary of the site.</p> <p>The public spaces will be designed to encourage, relaxation, and community interaction as well as exercise. A central park within the centre of the site will act as the heart of the community and provide opportunities for recreation and play. This will be supplemented by additional play areas and MUGA to encourage children of all ages to meet and play.</p> <p>Streets will be designed to encourage low vehicle speeds to allow them to function as social spaces, neighbours to mingle and children to play.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Further detail at reserved matters stage.
Does the proposal include a mix of uses and a range of community facilities?	Yes <input checked="" type="checkbox"/> No N/A	Whilst the development is residential-led, it includes an early years facility and other non-residential uses falling within Class E and Class F29b). Class F2(b) covers a hall or meeting place for the principal use of the local community. The actual use will however, depend on market demand.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	None required.
Does the proposal provide opportunities for the voluntary and community sectors?	Yes No N/A	The proposal includes a MUGA providing opportunity for informal community sports groups. In addition, 400sqm is proposed for non-residential uses which could include community uses.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain <input checked="" type="checkbox"/>	None required.
Does the proposal address the six key components of Lifetime Neighbourhoods?	Yes <input checked="" type="checkbox"/> No N/A	<p><b>1. Supporting residents to develop lifetime neighbourhoods</b> - The proposed development will be managed by a management company, with playspace and social spaces for all age groups.</p> <p><b>2. Access</b> - The proposed development has been designed to create an environment that is accessible for people of all ages and abilities with particular emphasis on visually impaired and less mobile people.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Further detail at reserved matters stage.

		<p><b>3. Services and amenities</b> - Good access to public transport will be provided to all residents within desirable walking distance of a bus service into Ipswich Town Centre. In addition, the development will be supported by 400sqm of non-residential uses, such as a convenience store. In addition, the site is in reasonable walking distance of the local centre at Selkirk Road, providing convenience retail, as well as primary and secondary education.</p> <p><b>4. Built and Natural Environments</b> - As set out in the Communities and Local Government Guidance on Lifetime Neighbourhood<sup>xi</sup>, the importance of greenspace for health and well-being cannot be underestimated and is an essential component of lifetime neighbourhoods. The Humber Doucy Lane development comprises at least a third greenspace, including, natural greenspace, playspace and general amenity space as well as street greenery and planting. In addition, it improves connectivity to the open countryside to the north of the railway line.</p> <p><b>5. Social Networks/Well-being</b> - The Humber Doucy Lane development provides external spaces which actively encourage social cohesion as set out above.</p> <p><b>6. Housing</b> - As set out under Theme 1, Humber Doucy Lane will deliver up to 660 new quality homes including a policy compliant level of affordable homes. Of these homes, a policy compliant level will meet the requirements of M4(2).</p>		
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## Theme 10 Minimising the Use of Resources

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement / Method of Securing
Does the proposal make best use of existing land?	Yes <input checked="" type="checkbox"/> No N/A	Whilst there is a loss of greenfield land associated with the development, the scheme retains at least a third of the land as open space and non-residential use with the majority of trees retained within the development. There is a requirement for greenfield development to meet housing need and the site has therefore been allocated as part of the Local Plan process.	Positive Negative <input checked="" type="checkbox"/> Neutral Uncertain	The adverse effects of greenfield development can be minimised through use of natural resources such as reusing topsoil within the scheme, together with retaining features of ecological value.
Does the proposal encourage recycling (including building materials)?	Yes <input checked="" type="checkbox"/> No N/A	<p>The proposed development is largely submitted in outline. However, waste has been considered for both the construction stage and operational phase of the development. A detailed Site Waste Management Plan will be drawn up for each phase.</p> <p>All residents would be provided with sufficient space to segregate waste and recyclables both internally and externally to accord with waste collection procedures.</p>	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	As part of a CEMP a Site Waste Management Plan will be implemented to maximise recycling. Further details of waste storage to be provided at reserved matters.
Does the proposal incorporate Sustainable design and construction techniques?	Yes <input checked="" type="checkbox"/> No N/A	<p>A high priority has been attached to creating a sustainable development.</p> <p>The key sustainable design principles adopted for the development include:</p> <ul style="list-style-type: none"> <li>• Energy efficient building fabric, together with the use of on-site renewable energy to comply with Part L Building Regulations;</li> <li>• Use of air source heat pumps and photovoltaics to deliver renewable ratings very significantly better than the current average in the locality;</li> <li>• Utilise certified timber throughout;</li> <li>• Utilise standard house-types to deliver efficiencies in construction;</li> <li>• All residential units will have water-consuming fittings to achieve 110 litres /day/ person;</li> </ul>	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	Further detail provided at reserved matters stage.

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		<ul style="list-style-type: none"><li>• Sustainable drainage (SUDs) using attenuation basins and swales; and</li><li>• Use of sustainable construction materials, with reference to the green guide- selecting A and A+ ratings wherever possible.</li></ul> <p>The application is largely submitted in outline, and further details on sustainable design will be provided at reserved matters.</p>		
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## Theme 11 Climate Change

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement / Method of Securing
Does the proposal incorporate renewable energy?	Yes <input checked="" type="checkbox"/> No N/A	The development is largely submitted in outline but will comply with latest Part L Building regulations requirements. In addition to energy efficiency fabric, it is envisaged that it will utilise heat pumps, as well as solar PV.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Detailed Energy Strategy to be secured through planning condition.
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, ie ventilation, shading and landscaping?	Yes <input checked="" type="checkbox"/> No N/A	The proposals will maximise natural ventilation through appropriate floorplate depths and cross-ventilation. Cooling requirements will be reduced through use of appropriate orientation and solar shading.  At the detailed design stage, each dwelling will be tested for overheating risk, and mitigation measures incorporated, including shading.  Non-residential uses will address overheating risks through their layout, footplate design, orientation and shading strategy.	Positive Negative Neutral Uncertain <input checked="" type="checkbox"/>	Further details to be determined at reserved matters stage.
Does the proposal maintain or enhance biodiversity?	Yes <input checked="" type="checkbox"/> No N/A	The proposed development will retain key features of ecological importance and introduce measures for creating new habitats and areas of value. In addition to on-site provision, which would deliver a small biodiversity net gain, contributions will be made towards off-site provision.	Positive <input checked="" type="checkbox"/> Negative Neutral Uncertain	Landscape strategy secured by condition. Off-site contributions secured by condition and legal agreement.
Does the proposal incorporate sustainable urban drainage techniques?	Yes <input checked="" type="checkbox"/> No N/A	A sustainable drainage strategy has been incorporated into the design, using the site area for attenuating the site run-off in attenuations ponds and swales.	Positive Negative Neutral <input checked="" type="checkbox"/> Uncertain	Detailed drainage strategy to be secured by planning condition.

## 6 Summary and Conclusions

- 6.1 An assessment has been undertaken of the impacts of the development on health across 11 themes. In summary, the proposed development is expected to give rise to a predominantly positive effect on health.
- 6.2 The assessment against the HUDU criteria presented in shows that the development would have a positive effect in relation to 37 of the 50 criteria. Only one negative effect has been identified, with effects on the remaining criteria being neutral or uncertain. Uncertain effects have been identified due to the outline nature of the application, due to lack of knowledge at this stage on orientation of buildings and landscaping. However, these uncertain effects would be positive or neutral with no further negative effects on health predicted. The only negative effect relates to the use of greenfield land. However, it should be noted that the site is allocated for development, due to the lack of available brownfield land.
- 6.3 A summary of the assessment against the themes set out under HUDU is set out below:

### Housing Quality and Design

- 6.4 The provision of up to 660 high-quality homes including affordable housing would have a positive effect on both physical and mental health of residents including vulnerable groups such as lower income residents having a positive effect in health. Key elements include:
- Provision of 660 high-quality, homes with good linkages to existing community;
  - Inclusion of affordable, energy efficient homes supporting those on lower incomes;
  - Housing mix to include a range of house types predominantly two, three, four and five bedroom houses with a small number of low-rise flats/apartments; and
  - Proportion of homes to be adaptable and accessible dwellings in accordance with Building Regulations Part M4 (Category 2) meeting policy requirement of 25% of in Ipswich and 50% in East Suffolk to be to M4(2) standard.

### Access to Healthcare, Education and Other Social Infrastructure

- 6.5 The proposed development provides a range of education and social infrastructure to support the new population ensuring a neutral to positive effect on residents and wider community. This includes:
- Early years facility meeting the demand generated by the development;
  - Creation of a green trail within a landscaped buffer zone in accordance with IBC planning policy;
  - Provision of open space including a new central park and playspace including LEAP's, and a MUGA assisting in meeting the deficit within north-west Ipswich;
  - Provision of 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b) to support the development;
  - Sufficient capacity predicted within existing and proposed local schools predicted; and
  - Financial contribution towards off-site healthcare provision to meet the primary health needs of residents.

## Access to Open Space and Nature

- 6.5 The proposed development will retain approximately one third of the site for open space and non-residential uses encouraging social cohesion and physical exercise having a positive effect on physical and mental health of future residents and the wider community. Key elements include:
- Existing tree and hedgerows are largely retained and enhanced; maintaining good air quality;
  - Provision of an accessible green trail which will contribute to the Council's desire to create a green rim around Ipswich, together with green corridors improving links from existing communities to open countryside to the north of the railway line, benefiting wellbeing and cardio-vascular health of residents and wider community;
  - Provision of playspace including LEAPS, a MUGA as well as informal playspaces for children including 'play on the way' features encouraging active play; and
  - Inclusion of natural greenspace and green corridors.

## Air Quality, Noise and Neighbourhood Amenity

- 6.6 During construction, it is intended that a Construction Management Plan will be implemented ensuring adverse effects including dust and noise on surrounding residents is minimised.
- 6.7 The layout of the development has been designed with consideration to the local noise environment, with a landscaped buffer proposed along the railway line to the north to protect future residents from potential noise from trains. Noise surveys undertaken have revealed that other than for a limited number of properties close to the external roads and the rugby club, no noise mitigation would be required.
- 6.8 Air quality at the site is well within the air quality objectives. The air quality assessment predicts that emissions from additional traffic will have a negligible effect at existing receptors, with pollutant concentrations well below the objectives at all existing receptors in 2026.
- 6.9 A traffic noise assessment has been undertaken to determine the effect arising from traffic noise associated with the development on surrounding receptors. This has highlighted that the effect both alone and cumulatively alongside Ipswich Garden Suburb would be negligible.

## Accessibility and Active Travel

- 6.10 The development will prioritise pedestrian and cyclists creating a pleasant, safe environment for all, and encouraging active travel, benefiting cardio-vascular health as well as physical and mental wellbeing. Key elements include:
- The site is well-connected and the provision of the green rim, together with secondary pedestrian routes and the new cycle paths will improve connections, between the existing community and the Fynn Valley.
  - All residential properties, as well as the non-residential uses will be provided with appropriate cycle storage to encourage cycling;
  - Formal and informal traffic calming will be used within the site to encourage low traffic speeds and maintain a pedestrian/cycle friendly development;
  - Residential travel plans will be implemented.

- The development will be served by buses with new bus stops proposed along the spine road, ensuring all residents are within 400m of a bus stop; and
- All key routes, together with the non-residential uses will be accessible to wheelchair users.

### Crime Reduction and Community Safety

- 6.11 The detailed layout of streets, buildings and landscape will be designed so that it avoids easy opportunities for crime and anti-social behaviour and fear of crime. Key elements will include:
- Key routes have been designed with active frontages and good levels of natural surveillance providing a safer environment for residents;
  - Buildings will have defensible space' with a clearly defined boundary between private and public; and
  - Pre-application consultation to identify local issues.

### Access to Healthy Food

- 6.12 The development would provide access to healthy food through:
- The proposals include up to 400sqm of non-residential floorspace under Class E, which could include a small foodstore;
  - No hot-food takeaway proposed; and
  - The provision of a small community orchard within open space.

### Access to Work and Training

- 6.13 The Proposed Development will contribute to access to work and training benefiting residents and the wider community;
- Generation of temporary construction employment opportunities. Development of 660 homes estimated to support employment of 2046 people during the construction phase including opportunity for training and apprenticeships;
  - Once operational 39 on-site jobs are estimated to be created, with a further 4 generated in the supply chain.

### Social Cohesion and Lifetime Neighbourhoods

- 6.14 The design will create a pedestrian friendly environment encouraging social interaction with neighbours, reducing loneliness and isolation and encouraging active play. Key elements include:
- Design that prioritises pedestrians and provides connectivity to existing communities as well as open countryside;
  - Central park including playspace, non-residential uses and early years facility within centre of site providing a vibrant heart to the new community;
  - A third of the site comprising open space and non-residential uses including new green trail, playspace for a range of age groups including MUGA, to encourage relaxation, and community interaction as well as exercise; and
  - Key spaces and routes will be designed to be accessible to all residents, including less mobile and visually impaired supporting inclusivity.

## Minimising the Use of Resource

- 6.15 Whilst the Site is on greenfield land, it should be noted that the site is allocated due to the lack of suitable brownfield land. The following sustainable design principles will be undertaken:
- Majority of trees and hedgerows retained within the site, with extensive tree planting proposed;
  - Implementation of Site Waste Management Plan encouraging reuse and recycling and space will be designed in to segregate waste and recyclables both internally and externally to accord with waste collection procedures;
  - All dwellings will be built according to the latest building regulations requirements. It is envisaged that in addition to energy efficient fabric, it will utilise heat pumps, as well as solar PV;
  - Utilise certified timber throughout;
  - Utilise standard house-types to deliver efficiencies in construction;
  - All residential units will have water-consuming fittings to achieve 110 litres /day/ person;
  - Sustainable drainage (SUDs) using attenuation basins and swales; and
  - Use of sustainable construction materials, with reference to the green guide-selecting A and A+ ratings wherever possible.
- 6.16 The application is largely submitted in outline, and further details on sustainable design will be provided at reserved matters.

## Climate Change

- 6.17 The development is proposed to be highly sustainable and mitigate adverse environmental effects through the following measures:
- All dwellings will be built according to the latest Part L Building Regulations;
  - New tree planting and retention of existing trees will help to reduce the heat island effect;
  - Sustainable drainage will ensure no adverse health impacts as a result of flooding; and
  - The proposed development will retain key features of ecological importance and introduce measures for creating new habitats and areas of value.
- 6.18 In addition to on-site provision, which would deliver a small biodiversity net gain, contributions will be made towards off-site provision.

## References

- <sup>i</sup> London, Healthy Urban Development Unit (HUDU) Planning for Health Rapid Health Impact Assessment Tool, Fourth Edition October 2019
- <sup>ii</sup> Town and Country Planning Association (2015) Public Health in Planning Good Practice Guide
- <sup>iii</sup> London, Healthy Urban Development Unit (HUDU) Planning for Health Rapid Health Impact Assessment Tool, Fourth Edition October 2019
- <sup>iv</sup> Public Health England, Ipswich Public Health England's Local Authority Profile 2018,
- <sup>v</sup> Arcadis, Health Impact Assessment, 2019, Final Draft Ipswich Local Plan 2018-2036
- <sup>vi</sup> Suffolk County Council and Public Health and Communities, 2022, Suffolk Annual Public Health Report 2022
- <sup>vii</sup> [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>viii</sup> [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>ix</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>x</sup> [suffolk-in-20-years-2023.pdf \(healthysuffolk.org.uk\)](#)
- <sup>xi</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>xii</sup> [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](#)
- <sup>xiii</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>xiv</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>xv</sup> World Health organisation, 2018, WHO Housing and Health Guidelines
- <sup>xvi</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>xvii</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)
- <sup>xviii</sup> <https://app.powerbi.com/view?r=eyJrljoiYWE2YjliMTktYzg0Yi00MmQzLTk3YjMtNDc1NmEzNTcxMWYyYliwidCI6IjEwOWM2YWVjLTUwNDYtNGE5NS04ZjNjLTg0ZjYzYmExOGFmNCJ9>
- <sup>xix</sup> [Search results for " - GOV.UK \(get-information-schools.service.gov.uk\)](#)
- <sup>xx</sup> <https://get-information-schools.service.gov.uk/>
- <sup>xxi</sup> Homes and Communities Agency, Employment Density Guide, 2010 [employ-den.pdf \(publishing.service.gov.uk\)](#)
- <sup>xxii</sup> Homes and Communities Agency, 2014, Additionality Guide, 4th Edition
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# Phase 2

PLANNING &  
DEVELOPMENT  
LIMITED