

Appendix 1

Land at Humber Doucy Lane, Ipswich (Planning App Refs. 24/00172/OUTFL and DC/24/0771/OUT) Appeal

Background to the Humber Doucy Lane Framework Plan

1. Framework Plan – Process

- 1.1 PRP acted as urban designers and masterplanners in the preparation of the hybrid planning application for Land at Humber Doucy Lane, combining strategic vision with design to produce a robust, contextually informed proposal. The development of the Framework Plan commenced with a comprehensive site analysis, assessing physical characteristics, constraints, opportunities, and the surrounding context to shape a masterplan that aligns with planning policies and addresses community needs. Collaborating with the wider Design Team, a vision for the site was established, rooted in Local Plan objectives and focusing on land use, connectivity, spatial arrangements, placemaking, and aesthetic quality. The design process was shaped by regular project team meetings, consultation events, pre-application discussions, and workshops involving a broad range of consultants. Key deliverables included the illustrative masterplan, parameter plans, and the Design and Access Statement (DAS). Engagement with stakeholders—such as local authorities, consultants, and the community—was pivotal in addressing concerns and garnering support. The Design Team prioritised compliance with local planning policies while integrating design principles and green infrastructure to create a sustainable and cohesive proposal.
- 1.2 The proposed Framework Plan has been shaped in accordance with the existing site allocation and the aspirations of IBC and ESC as outlined in local policy documents. It has been informed by a comprehensive body of evidence gathered by the Design Team, which considered the site context and constraints, including arboriculture, archaeology, heritage features both on-site and in the surrounding area, transport modelling, flood risks and SuDS, Ecology and acoustics.
- 1.3 The context and urban design analysis, as presented in Chapter 2 of the DAS (pages 21-55), acknowledges the cross-authority location of the site and its sensitive positioning between the built-up suburban environment of ISBC and the rural green character of ESC, with its proximity to listed buildings. These considerations have shaped the proposed height and density strategies, ensuring they respond appropriately to the surrounding context. The allocation parcels have been approached as a cohesive development, where administrative boundaries within the allocation site are treated as guidelines rather than strict divisions, enabling a balanced, efficient, and sustainable layout. The access and movement strategy aim to maximise connectivity for pedestrians, cyclists, and vehicles, while remaining within existing ownership boundaries and the site allocation limits defined by IBC and ESC local policy documents.
- 1.4 The overarching approach to the Framework Plan is landscape-led, as described in the Masterplan Vision chapter within the DAS (pages 60-73), with a strong emphasis on protecting and enhancing existing landscape features and the rural character. The submitted framework builds upon the wider landscape strategy aspirations of IBC and ESC, such as a section of the Green Trail along the north-eastern edge of the allocation boundary. It integrates and connects with the well-established network of public rights of way and quiet routes.
- 1.5 The new neighbourhood is organised into compact parcels linked by green corridors and trails, with open spaces located at key intersections. This layout ensures residents have excellent access to nature, while active frontages along the green corridors enhance security and contribute to a vibrant streetscape.
- 1.6 The central open space is framed by surrounding parcels, activated by residential and community-use frontages, and includes a play area at its heart. The development is screened from Humber Doucy Lane by stretches of retained hedgerows. The Green Trail, with its denser vegetation, acts as a natural corridor

and leisure route, shielding the development from the sensitive rural areas of ESC, which feature long vistas, listed farm buildings, and the Rugby Club. The SuDS strategy is also landscape-led, with attenuation basins placed within green corridors. One of these corridors creates a gateway near the main site access, and green verges along the spine road further reinforce the overall green character of the new neighbourhood.

1.7 The Design Team carefully considered feedback from public consultations and engagement with IBC and ESC, as summarised in Chapter 3 of the DAS (pages 56-57) and the detailed Statement of Community involvement submitted alongside the planning application. Discussions with officers highlighted several key matters, including the importance of retaining hedgerows along Humber Doucy Lane, the positioning of the central open space, and the arrangement of the spine road around it. The design also prioritised providing separate access points for the northern parcel on Tuddenham Road and the main development, avoiding vehicular connectivity between them. Other sensitivities addressed include the low-rise Tarran bungalows on the urbanised western side of the development and the long vistas and open spaces on the rural eastern side.

1.8 The process, findings from urban design analysis, surveys, key consultation feedback, and the development of the Vision are all detailed comprehensively in the Design and Access Statement (DAS).

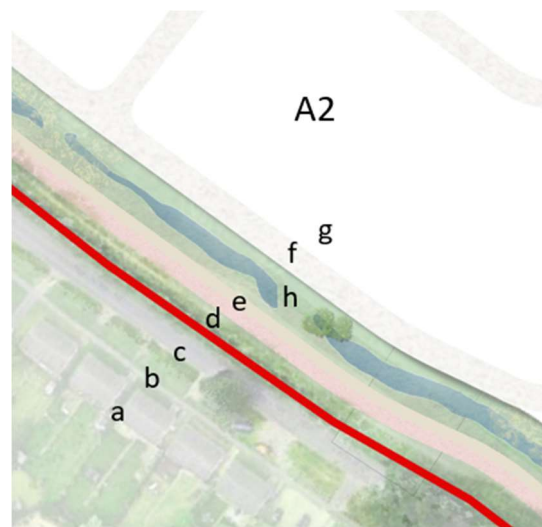
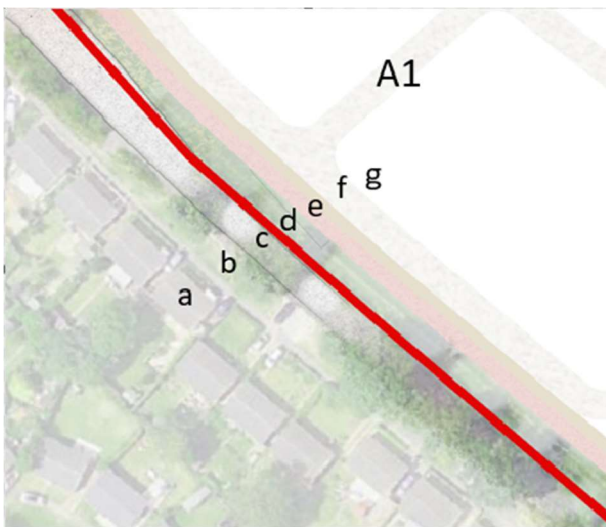
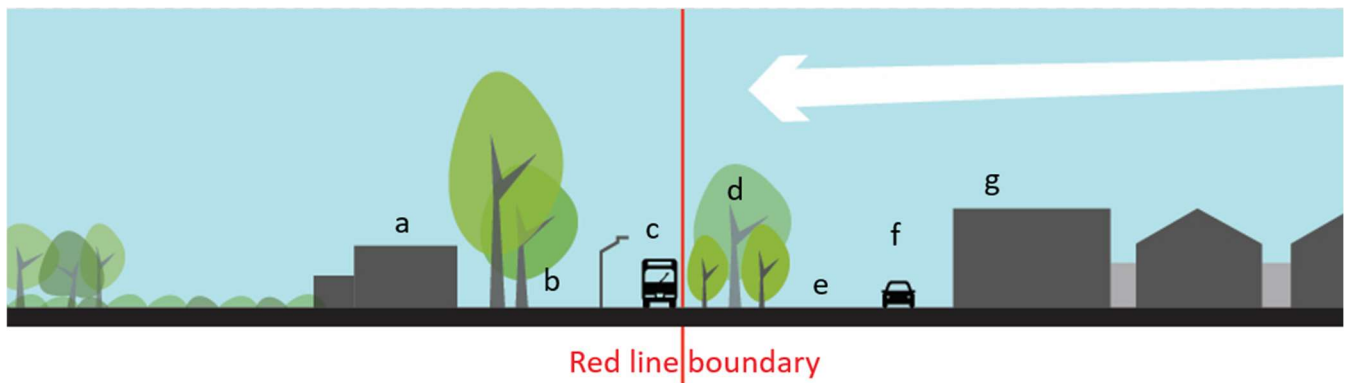
2. Approach to site buffers, (DAS, pages 88 -89 for summary approach)

2.1 **Buffer approach with Humber Doucy Lane:** The sensitivity of Humber Doucy Lane has been carefully considered, in relation to the existing hedgerows and mature trees, as well as the low-rise, low-density development present along the lane. The proposed access strategy has been developed with these challenges in mind and is based on rigorous testing of potential access locations and configurations. This analysis determined that all options other than the proposed one were not feasible. The approach to setbacks from existing developments addressed these considerations, aiming to achieve the following objectives:

- **Provide effective screening:** To sensibly screen the sensitive low-rise, low-density development across Humber Doucy Lane, particularly the Tarran bungalows (a), and to respect their character by incorporating lower building heights towards the edge of the new development.
- **Ensure integration:** To integrate the new development into the existing urban fabric by enhancing connectivity and avoiding unnecessary spatial separation.
- **Create active movement infrastructure:** To establish a cycle lane and pedestrian path (e) serving both existing and new communities. This movement corridor is designed to accommodate existing mature vegetation (d), including root protection areas along Humber Doucy Lane, while being positioned close enough to the lane to encourage use by pedestrians and cyclists.
- **Provide active frontage:** To ensure the new development faces the active movement corridor and Humber Doucy Lane, promoting good visibility and a sense of safety for users.

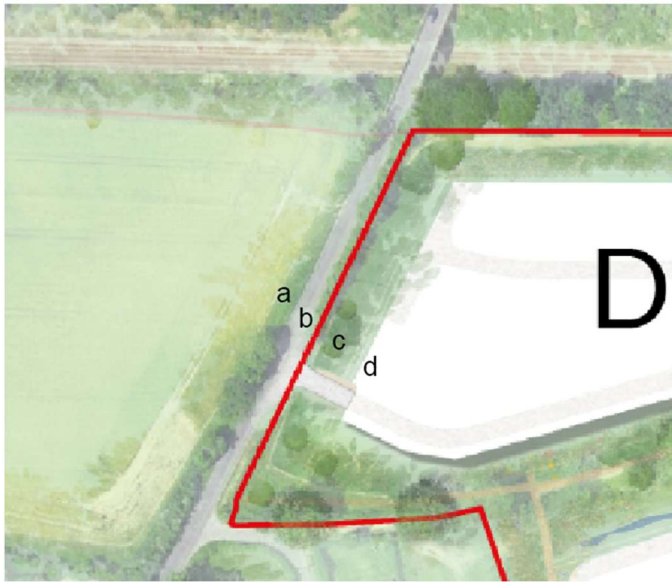
A natural corridor incorporating SuDS features has been included to provide an additional buffer between the existing community and Parcel A2. However, this buffer has been kept relatively narrow to maintain strong oversight of the pedestrian and cycle routes.

The overall distance between the Tarran bungalows (a) and the new development (g) (measured frontage to frontage) will range approximately from 37 metres to 50 metres. For a detailed understanding, please refer to the illustrative cross-section with key annotations, below:



- a – Tarran bungalows;
- b – Green verge, footway and driveways;
- c – Humber Doucy Lane;
- d – existing mature hedgerow along Humber Doucy Lane;
- e – Proposed cycle lane and footway;
- f – Proposed access road to new development (indicative);
- g – residential properties (indicative);
- h – natural/SuDS corridor

2.2 Buffer approach with Tuddenham Road: Parcel D is located within the Tuddenham Green character area, as outlined in the Design and Access Statement (DAS). This character area is positioned at the northern edge of the site, it is bordered by railway lines, Tuddenham Road, and a public right of way (PRoW) that traverses the area. The northern boundary offers an opportunity to create a tranquil green space that integrates the existing mature verges and landscaping. The development sets back from Tuddenham Road, creating a strong vegetation buffer that not only enhances the visual appeal of the edge but also protects the existing hedgerows. It ensures smooth integration with the character areas located further south, fostering a cohesive and natural transition throughout the site. The average width of the green buffer between Tuddenham Road (b) and the new development (g) (measured frontage to frontage) will be approximately 17 metres. For a detailed understanding, please refer to the illustrative plan with key annotations, below:



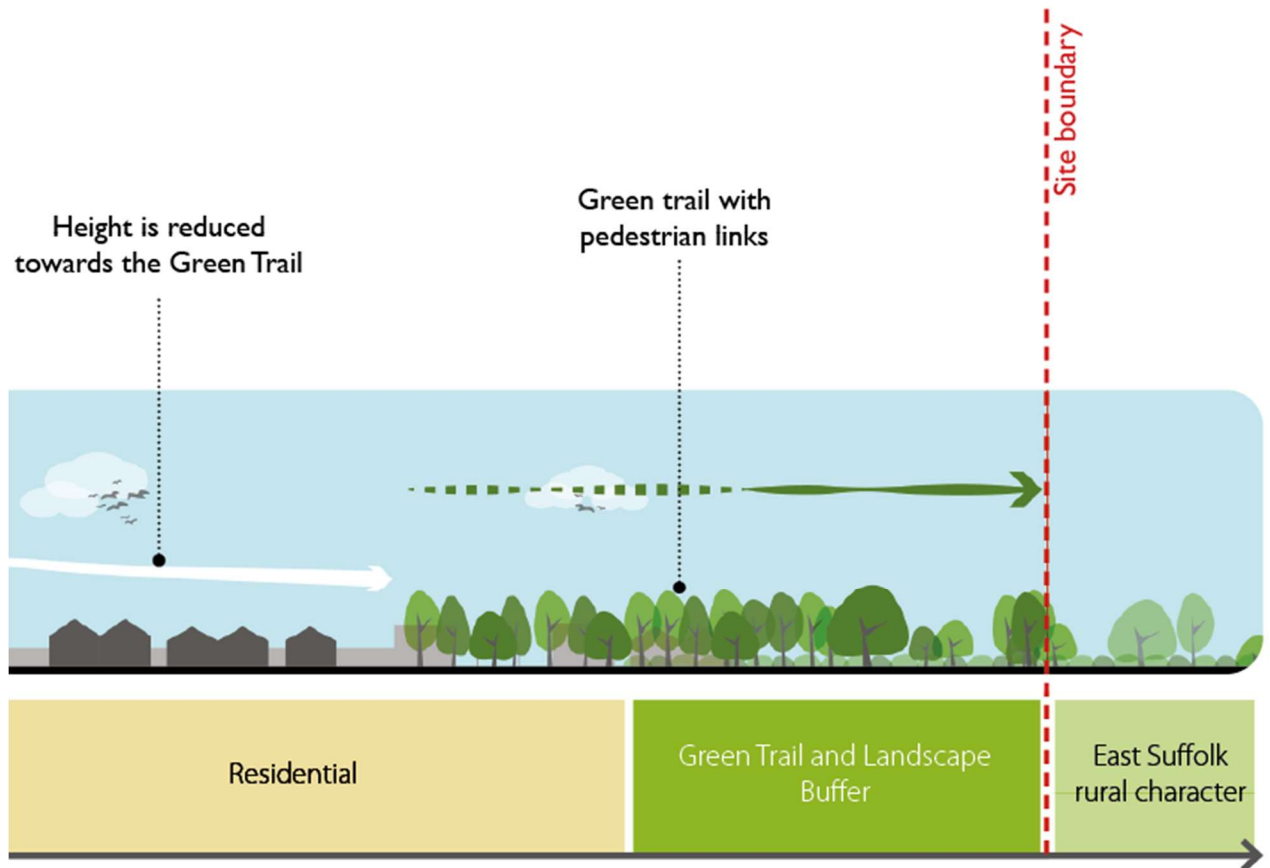
- a – Farmland;
- b – Tuddenham Road;
- c – buffer zone between Tuddenham Road including hedgerow;
- d – residential properties (indicative).

2.3 The Green trail: The Green Trail is a key feature of the site's boundary and, as identified in the Local Plan, is far more than a pedestrian route. It serves as a vital green corridor that supports biodiversity, encourages healthy lifestyles, and provides a strategic connection to Ipswich. While its physical connectivity is crucial, the trail's role in fostering diverse landscaping is equally significant, particularly in mitigating the environmental impact of the housing development. The Green Trail reflects a thoughtful, sensitive approach to its surroundings, focusing on reducing ecological disruption and enhancing community interaction.

The use of lower house heights along the trail's edge helps preserve its natural character, inviting greater engagement with nature. This edge condition approach ensures the trail maintains its ecological integrity while creating opportunities for active use, making it a dynamic space that contributes to the quality of life for residents and visitors alike.

To ensure this edge provides a seamless transition between the development and the surrounding landscape, its design has been meticulously tailored within each character area. The Green Trail buffer zone varies in width, ranging approximately from 25 metres to 100 metres. For a detailed overview,

please refer to the illustrative cross-section with key annotations below:



3. Approach to access points & movement

- 3.1 The access and movement strategy outlines the principles guiding vehicular access to the site and internal circulation arrangements. This strategy is substantiated by a transport assessment and traffic modelling, both of which were integral to the application, as described in the DAS, pages 76-77.
- 3.2 Spine Road: The spine road serves as the primary access route to the site from Humber Doucy Lane, providing connectivity to most development parcels, except parcel D in the northern section and parcel E in the south-west. The road connects to the site opposite Inverness Road, loops around the central open space, extends through the middle of the site, continues to the northern boundary, and terminates at parcel B1. In addition to vehicular traffic, the spine road fulfils multiple functions. It also acts as a primary pedestrian and cycle route, incorporates Sustainable Urban Drainage Systems (SUDS), and supports bus transit for most of its length.
- 3.3 Potential Access Points: The principal site access will be via a signalised junction at the intersection of the Spine Road, Humber Doucy Lane, and Inverness Road. Two supplementary access points will provide entry to parcel E in the south-west and parcel D in the north. Parcel D in the north will be accessed from Tuddenham Road, while the south-western parcels will utilise a junction situated at a bend in Humber Doucy Lane.
- 3.4 The proposed approach to site access junctions, as outlined in the DAS (pages 78-79), includes a signalised ghost island junction designed to accommodate anticipated traffic flows. This compact design was chosen over non-signalised alternatives to reduce its overall impact on the area. The junction's location was carefully selected based on several key factors: retaining the northern hedgerow along Humber Doucy Lane to maintain the site's natural character, minimising disruption to existing driveways and properties, preserving trees on the southern side, and enhancing road safety by lowering vehicle speeds. Additional considerations included ensuring safe turning movements for both existing and development-related traffic, providing secure access for pedestrians and cyclists, and enabling convenient bus access to and from the site. To avoid greater environmental and residential disruption, the design makes use of an existing junction rather than creating a new mid-road access point.

- 3.5 Alternative access from the Sidegate Lane junction was evaluated but rejected due to safety concerns stemming from its proximity to the Rugby Club entrance. Instead, a bus gate access with pedestrian and cycling infrastructure, including a Tiger crossing, was adopted. The signalised junction on Inverness Road addresses multiple objectives: offering a secure crossing for non-vehicular traffic, enabling adaptive four-way vehicle control for optimal traffic flow, and integrating speed control measures along Humber Doucy Lane. This solution strikes a balance between safety, accessibility, and environmental preservation while minimising disruption to nearby residents.
- 3.6 The access points have been thoughtfully chosen to address feedback received during the pre-application process, respond to key site constraints where feasible, and comply with visibility and speed safety standards. This approach also ensures minimal disruption to the existing driveways situated to the south of Humber Doucy Lane.

4. Framework Plan / Masterplan definition

- 4.1 The *NPPF* and *National Design Guide* don't provide a fixed definition for the term "masterplan", however, the *Design: Process and tools* (Gov.uk) suggests that "Masterplans set the vision and implementation strategy for a development. They are distinct from local design guides by focusing on site specific proposals such as the scale and layout of development, mix of uses, transport and green infrastructure" ([Design: process and tools - GOV.UK](#), Paragraph: 006 Reference ID: 26-006-20191001, Revision date: 01 10 2019). It also implies that masterplans can vary in terms of the level of details, and "may indicate the intended arrangement of buildings, streets and the public realm".
- 4.2 In preparation for the submission of the application, the Design Team carefully considered the level of details to be submitted. The proposed approach is intended to set the most important parameters for the development, but at the same time providing appropriate flexibility for the further Reserved Matters stage. The Framework Plan offers a visual and descriptive summary of the key spatial features of the proposed development. It depicts the arrangement of development parcels, scale, green spaces, major transport infrastructure, access points, and the development's relationship with its immediate context. Accompanying the Framework Plan is a set of parameter plans, which establish the core parameters for these elements, aligning with the definition of a Masterplan as outlined above. DAS, pages 70-71
- 4.3 Although the Framework Plan does not detail the arrangement of buildings and smaller roads, the principal areas of public realm are addressed comprehensively within the Landscape Strategy, DAS, pages 114-119. This ensures a cohesive approach to the design of shared spaces across the development.
- 4.4 As described in the Design and Access Statement, the main design intentions for the parcel are clearly articulated. These include a commitment to outward-facing perimeter blocks, which promote active frontages and enhance natural surveillance. The layout is further informed by principles of connectivity, ensuring that the parcels integrate seamlessly with the wider masterplan, both functionally and aesthetically. Other key elements include well-considered interfaces between private and public spaces, prioritisation of pedestrian and cycle routes, and the provision of green spaces that serve both recreational and ecological purposes. All of the above are described in detail within Chapter 05 of the DAS, Design Strategies, on pages 74–102.
- 4.5 In addition to the Framework Plan, a series of supplementary studies have been carried out and are included in the DAS, Chapter 6, pages 106 –111, describing various aspects of the character areas and relationship with the surrounding context. They outline illustratively the design intent of the proposals and precedent images, focusing on streetscape character, open spaces, the public realm, movement strategies, access arrangements, and connections to the wider area. This ensures that the development is thoughtfully integrated into its context and surroundings.

Appendix 2

Kevin Coleman

From: James Mann <james.mann@ipswich.gov.uk>
Sent: 31 May 2024 10:42
To: Kevin Coleman
Cc: Rosalynn Claxton; Ben Woolnough
Subject: Humber Doucy Lane - EOT and further pre-app engagement

Good morning Kevin,

Hope you are well. Just a couple of follow ups from the meeting last Friday and our conversation on Tuesday of this week. The response below is from the perspective of both ESDC and IBC.

In response to your question about the access and further pre-application engagement

At present we have insufficient evidence to demonstrate that the proposed access arrangements are acceptable and in particular we are concerned by the harm caused by the signalised junction to the character and amenity of this part of HDL which we are unable to conclude is justifiable and acceptable, this is supported by the lengthy SCC Highway Authority objection. From both an IBC and ESDC perspective we would welcome further pre-application discussions on the scheme and this would, of course, need to include further pre-application discussions with the local highway authority.

EOT

You have had sight of all comments that have been made. Highways comments were sent as soon as they were received, last Friday (24/05/2024). On that basis we are still seeking to issue a decision on the 4th June in line with the 13 week timescale.

Should you wish to withdraw the application prior to the determination please let us know by 3rd June. We would welcome the opportunity to enter pre-application discussions to work toward a scheme that officers can support.

Kind regards,

James



James Mann MRTPI

Ipswich Borough Council | **Head of Planning and Development**

Tel: 077217 36912 / 01473 432926

www.ipswich.gov.uk

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No ID, apply for a free Voter Authority Certificate by 5pm on 25 June:

www.ipswich.gov.uk/pollingstationID

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Appendix 3

Felicia Blake

From: Mike Hancock
Sent: 26 February 2020 11:31
To: Michael Hammond
Cc: PlanningPolicy
Subject: Re: Ipswich RFC - Land At Humber Doucy Lane, Ipswich IP4 3PZ

Dear Sir

PROPOSED LOCAL PLAN SITE ALLOCATION

1P184b - Land at Ipswich RFC HUMBER DOUCY LANE IP43PZ

In light of the recent notice regarding land allocation adjacent to Ipswich RFC, Humber Doucy Lane IP43PZ

I would like formally register comments of behalf of Ipswich Rugby Football Club and to request a meeting to discuss 2 specific points.

1 The absence of land 1P184b in any allocation. This land is a driveway and a grassed playing area for youth and junior rugby. It also serves as overspill car parking on busy senior match days. It is not large enough for a full size pitch and is therefore only generally used by Under 11 & Under 12 years age groups).

2 Replacement facilities for any loss of land currently used for playing and training by Ipswich RFC that abuts IP184b (part of land identified as ISPA4.1 in your most recent PROPOSED LOCAL PLAN SITE ALLOCATION

Please note that Ipswich RFC is now in its 150th year. It continues to serve the local rugby playing community including making provision for a growing interest in girls and women's rugby. It runs rugby for 11 age groups from under 6 through to under 18's. It runs 3 men's senior teams, a women's team and 2 fledgling girls age group teams. All sections of our club are growing.

The club already has a requirement for extra land to meet the demands being made upon it.

We currently lease land adjacent to IP184b to meet demand (as well as hiring an all weather floodlit facility nearby on a weekday evening as we do not have sufficient floodlit space at Humber Doucy Lane).

Ipswich RFC requires at least one more full size rugby pitch and an all weather floodlit facility plus 100-150 more hard standing car parking spaces to better meet the demands being made upon it.

Our clubhouse facilities are not at the required standard. We require additional changing room facilities and well as improved gender separation for changing rooms and disabled toilets.

In short we are bursting at the seams and struggling to meet the demands made upon us by the local rugby community due to the successful endeavours of dozens of volunteers.

We do not wish to be omitted from any land allocation with the view that any subsequent funds realised by land sale could greatly assist the club in better meeting the demands currently being placed on it. Moreover we are seeking to expand our offering to the local rugby community

should larger replacement playing facilities adjacent to our current pitches be made available or a new site identified.

We recognise that the majority of our land ownership falls within East Suffolk Council but we primarily serve the needs of Ipswich Borough Council residents.

We have had plans drawn up for a new clubhouse under guidance from the Rugby Football Union. We are also looking at a separate project with a phased extension/refurbishment of the existing clubhouse. However we seem to be in a permanent CATCH 22 situation of not knowing what may happen with land allocation for planning and find it difficult to make progress with any development plans.

Your acknowledgement of receipt of this e-mail would be welcome ahead of the consultation period end (1145 March 2nd 2020).

I would be obliged if a meeting could be arranged to discuss the contents of this letter and any broader issues that could help enhance Ipswich RFC's offering to the local community.

With kind regards

Mike Hancock
Chairman
Ipswich RFC

On Tue, 12 Mar 2019 at 10:15, Michael Hammond <Michael.Hammond@ipswich.gov.uk> wrote:

Dear Mr Hancock,

Thank you for your email regarding Ipswich RFC's land at Humber Doucy Lane. Apologies for taking so long to formally respond.

On behalf of the RFC you helpfully completed and returned the form we sent you regarding the RFC's land and confirmed that the draft site sheet assessment (January 2017) was accurate. This response was used to help inform our draft Strategic Housing and Employment Land Availability Assessment (SHELAA). A copy of your response is attached for ease of reference. A link to the draft SHELAA as published is available to view on the link below. The RFC land is identified under site reference IP184b (pages 166 – 167):

https://www.ipswich.gov.uk/sites/default/files/draft_strategic_housing_economic_land_availability_assessment_-_jan_2019.pdf

As you may be aware, Ipswich Borough Council is currently undertaking a review of its Local Plan to help guide development of the Borough to 2036. A consultation on the Preferred Options of the Local Plan commenced on 16th January and will end on 13th March.

As part of this process, the Council is required to identify potential sites that may be suitable for residential development over the Local Plan period. This is informed by evidence gathered as part of the SHELAA exercise. It is important to note that the identification of potential sites do not act as planning applications nor do they constitute planning permissions.

Under the preferred options Local Plan we are identifying a broad location at the northern end of Humber Doucy Lane that may potentially deliver appropriate residential development and associated infrastructure after 2031. Further information regarding this broad location for development can be found in the Core Strategy and Policies Development Plan Document under Policy ISPA4 (page 30). A link to this document and a link to the accompanying policies map can be found below.

https://www.ipswich.gov.uk/sites/default/files/combined_core_strategy_with_a3_sheet_review_preferred_options_-_clean_030119.pdf

https://www.ipswich.gov.uk/sites/default/files/local_plan_policies_map_ipswich_-_preferred_options_draft_nov_2018.pdf

This broad location covers the Ipswich RFC's land along with the adjoining land owned by Kesgrave Covenant and WO & PO Jolly (Ipswich) Ltd. At this stage, this broad location does not specify precisely which sites covered by this broad location may or may not be required to deliver development in this area.

It should be made clear that the proposals map and identification of the RFC's land as part of this broad location does not represent the land ownership status of this land nor any other parcel of land in the Borough. We fully acknowledge and are aware that part of the land within the broad location is within the ownership of the RFC.

The ISPA4 Policy states at criterion b that replacement sports facilities, if needed, will need to be included as part of the infrastructure requirements to deliver development in this location. Therefore, any development on the broad location that would affect the RFC facility would either need to retain the existing sports facility, provide a replacement facility or demonstrate that equal or greater provision is delivered at an alternative site.

In terms of notification as part of the Local Plan process we have now added you to our mailing list so you will receive notifications of all future documents which get published. If you wish to comment on the ISPA4 Policy please follow the instructions on the "How to Comment" section of the website below:

<https://www.ipswich.gov.uk/ipswichfuture>

In addition to the above, officers would welcome the opportunity to discuss the Local Plan process and understand your position if you would be open to this? Please let me know if so and we can arrange an appropriate date to meet.

Please let me know if you require any clarification on any of the above.

Yours sincerely,

Michael Hammond

Michael Hammond

Senior Planning Policy Officer

Planning and Development

01473 432905

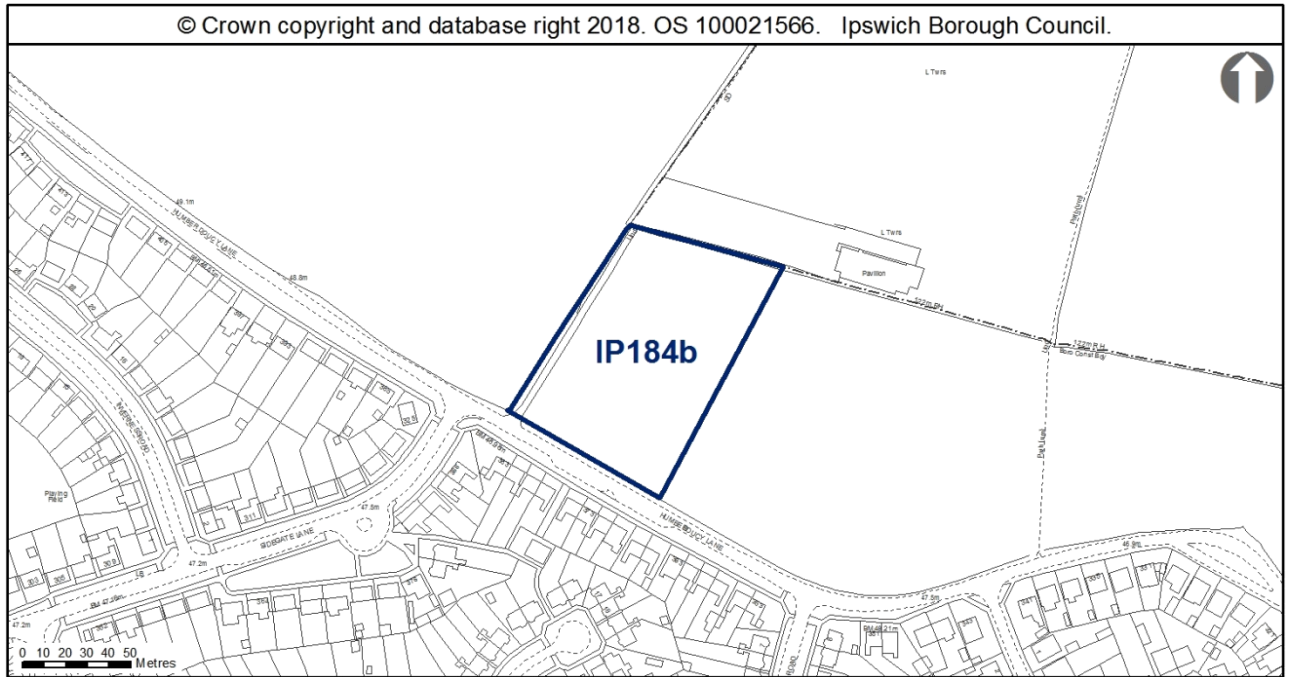
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District:	Ipswich Borough Council		
Site Reference:	IP184b		
Site Location:	Humber Doucy Lane		
Approx site area (ha):	0.86	Brownfield / greenfield / mixed use land:	Greenfield
Existing land use:	Sports Pitch		
Neighbouring land use:	Residential, agricultural land		

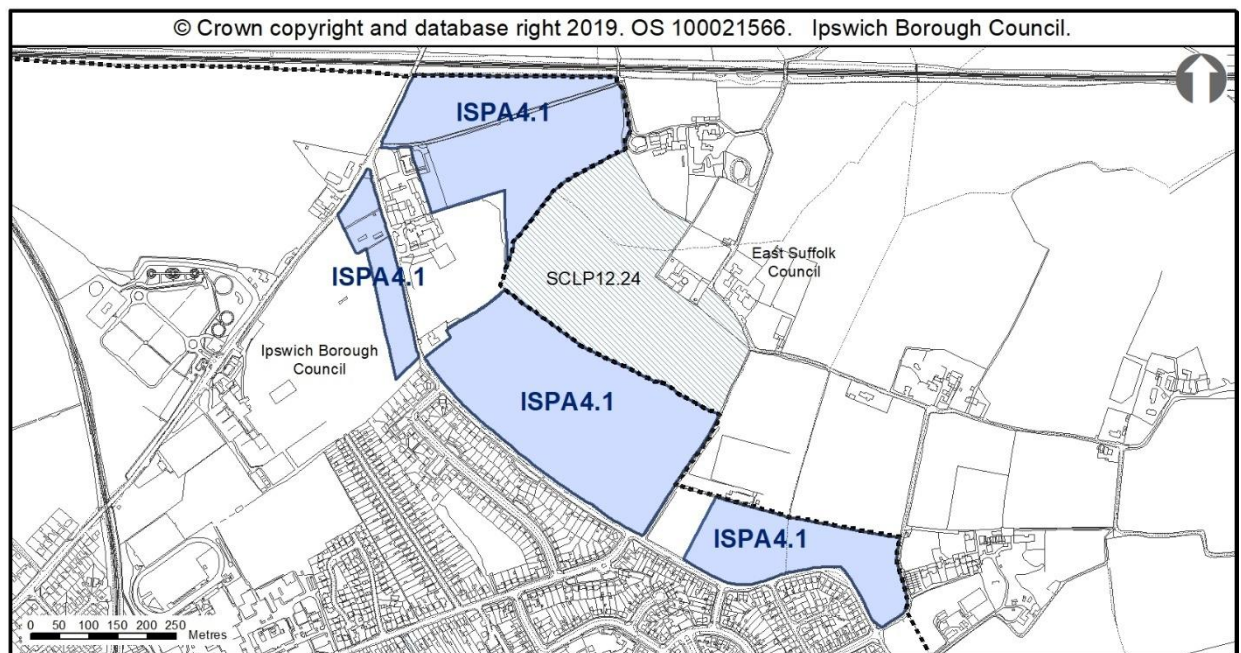
CONSTRAINTS		IMPACTS	
Access to site	Amber	Landscape/townscape	Amber
Access to wider transport networks	Amber	Biodiversity and geodiversity	Amber
Access to local services & facilities	Amber	Historic environment	Green
Utilities capacity	Amber	Open space	Amber
Utilities infrastructure	Amber	Transport and roads	Amber
Contamination	Amber	Compatibility with neighbouring uses	Green
Flood risk	Green		
Market attractiveness	Green		

Proposed land use description:	Residential
SHELAA site assessment	
Suitability	Yes, subject to infrastructure and access provision
Availability	Not currently available, but site could be available for redevelopment subject to provision of replacement facilities
Achievability	The site could come forward in the long-term, but as the rugby facilities span the Borough boundary, a joint approach would be

	needed with East Suffolk Council. The site is located in the higher value zone in the Whole Plan Viability Assessment. The Assessment also demonstrates that housing-led greenfield developments are viable.
Site conclusion - Housing:	May be suitable for housing development subject to transport and other infrastructure provision, as part of a wider, comprehensive master plan (potentially with the neighbouring local authority), but currently in use by Ipswich Rugby Club and therefore not available. As with IP184a, traffic and other infrastructure would need to be considered and the wider context of the site. Indicative capacity at 35dph with a net site area of 60% (0.516ha) is 18 dwellings.
Estimated dwellings yield:	0
Estimated delivery timetable:	11 – 15 years
Site conclusion - Employment:	Not suitable for employment due to neighbouring uses

Appendix 4

Site Ref: ISPA 4.1 – Northern End of Humber Doucy Lane
Site Area: 23.62ha (within IBC Land)



Allocation Policy SP2 & ISPA4

Use(s)		Indicative capacity
Primary	Residential	496 (35dph on circa 60% of site)
Secondary	Green Rim Trail Highways Improvements Early Years Setting Sports Pitches Suitable Accessible Natural Green Space (SANGS) Associated Infrastructure	Approximately 40% of site

Adopted Plan 2017

N/A – New Site. Previously allocated as Countryside.

Current use

Predominantly greenfield arable land.

Development constraints / issues

The principles and requirements set out in policy ISPA4 of the Core Strategy and Development Management Policies DPD must be followed.

The development of this land will need to be masterplanned along with the adjacent land allocated under the Suffolk Coastal Local Plan Review Policy SCLP12.24.

Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure that there is sufficient infrastructure capacity to meet demand.

An Early Years setting and replacement sports facilities, if needed, will need to be incorporated into any future development. Development will need to make appropriate provision towards primary school places which are likely to be accommodated within the three new primary schools planned through the Ipswich Garden Suburb.

The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to help deliver the wider Green Trail around Ipswich. The provision of Suitable Accessible Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD.

Highways and junction improvement works along Humber Doucy Lane are likely to be required. A transport assessment and travel plan will be required to ensure that development contributes towards delivering a significant modal shift to sustainable transport modes.

A high-quality of design will be required which also respects the countryside setting around the site. Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019⁸ provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable.

⁸ See Wildlife Audit Site Sheets for IP184a, IP184c, IP303, IP309, IP344 and IP350

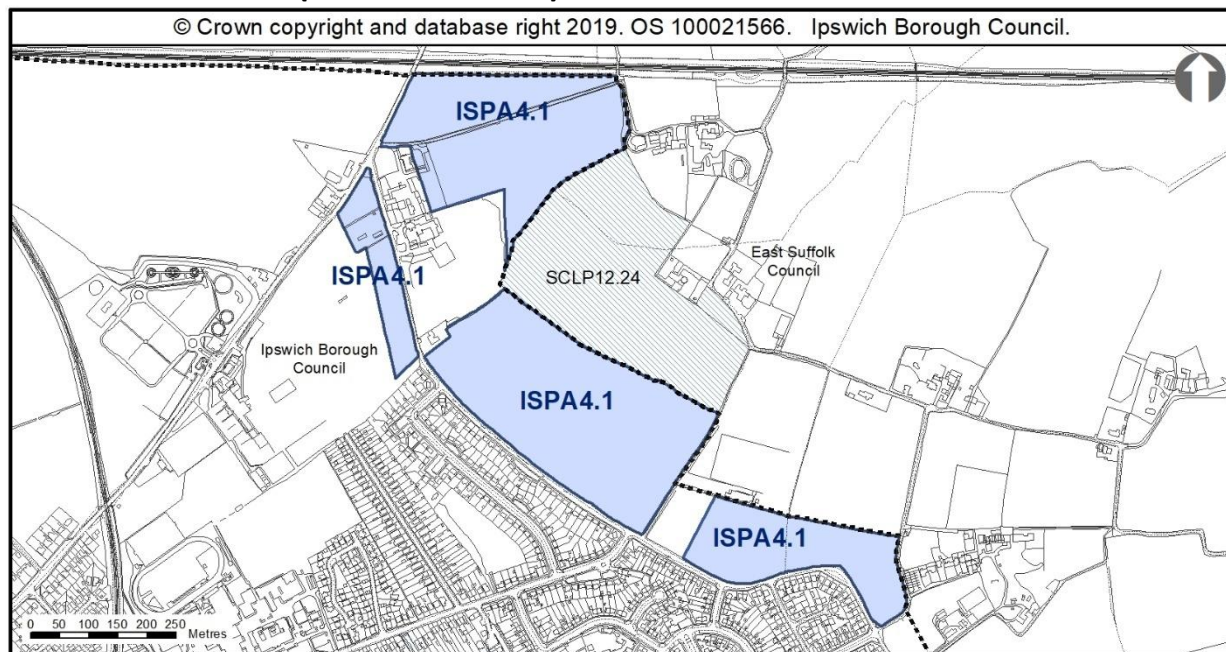
The setting of the grade II Listed Westerfield House Hotel must be preserved and enhanced as part of any future development of the site. The development should also seek to preserve the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse.

Appendix 5

Appendix 10

Site Ref: ISPA 4.1 – Northern End of Humber Doucy Lane

Site Area: 23.62ha (within IBC Land)



Allocation Policy SP2 & ISPA4

Use(s)		Indicative capacity
Primary	Residential	<u>449</u> 496 (35dph on circa 60% of site)
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Adopted Plan 2017

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Current use

Predominantly greenfield arable land.

Development constraints / issues

The principles and requirements set out in policy ISPA4 of the Core Strategy and Development Management Policies DPD must be followed.

The development of this land will need to be masterplanned along with the adjacent land allocated under the Suffolk Coastal Local Plan Review Policy SCLP12.24. Any masterplan work should take forward the recommendations set out in the Heritage Impact Assessment commissioned by Ipswich Borough Council September 2020, which forms part of the evidence base of the local plan. The HIA discusses the sensitivity of the area and makes recommendations about how to bring forward development with regard to the sensitivities of the historic landscape. Any subsequent planning application will require a full heritage statement.

The setting of the grade II listed Westerfield House, Allens House, Laceys Farmhouse, the Garden Store North of Villa Farmhouse, must be preserved and enhanced as part of the future development of the site. The HIA also identifies a number of non-designated heritage assets which development must also have regard to in terms of impact on significance.

Secondary uses such as the SANGs, green rim trail and sports pitches would help to retain the open character of the landscape and preserve the rural edge of the town and will be most appropriate in the northern portion of the site allocation where the setting of listed buildings is most sensitive. A similar approach should be adopted on the opposite side of the road from Westerfield House. This area should not be developed with built form but would lend itself to an area of open space perhaps taking the form of allotment facilities. The core of the residential allocation should come forward at the northern side of Humber Doucy Lane which is less sensitive to development with regard to impact on the historic environment.

Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure that there is sufficient infrastructure capacity to meet demand.

An Early Years setting and replacement sports facilities, if needed, will need to be incorporated into any future development. Development will need to make appropriate provision towards primary school places which are likely to be accommodated within the three new primary schools planned through the Ipswich Garden Suburb.

The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to help deliver the wider Green Trail around Ipswich. The provision of Suitable Accessible Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD.

Highways and junction improvement works along Humber Doucy Lane are likely to be required. A transport assessment and travel plan will be required to ensure that development contributes towards delivering a significant modal shift to sustainable transport modes.

A high-quality of design will be required which also respects the countryside setting around the site. The HIA recommends that the area of open land in front of Seven Cottages is sensitive to development owing to the transitional nature of the site on the rural edge of the Ipswich, East Suffolk boundary. This area should not be developed with built form but would lend itself to an area of open space perhaps taking the form of a village green.

Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019¹ provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable. Reinstatement of the 'ombre douce' tree line along this section of Humber Doucy Lane represents an opportunity for enhancement of the historic landscape character.

~~The setting of the grade II Listed Westerfield House Hotel must be preserved and enhanced as part of any future development of the site. The development should also seek to preserve the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse.~~

¹ See Wildlife Audit Site Sheets for IP184a, IP184c, IP303, IP309, IP344 and IP350

Appendix 6

Site Details

Parish / Town	Rushmere St Andrew
Site reference	1083 Land opposite 309-405 Humber Doucy Lane, Rushmere St Andrew
Site Area (hectares)	5.90
Proposed use	Housing
Existing land use	Agricultural land
Neighbouring land uses	Water tower adjoins the site.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Existing vehicle access via narrow Stiles Lane.
Utilities capacity	Green	No issues identified.
Utilities Infrastructure	Green	Water Tower adjoining the site.
Contamination	Green	No issues identified.
Flood Risk	Green	No issues identified.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Amber	The site is separated from the nearest built up area by sports pitches and its impact on the urban – rural fringe of the Ipswich urban rea would need to be considered alongside larger adjacent site 1087.
Biodiversity	Green	No issues identified.
Historic Environment	Green	No issues identified.
Open Space	Green	No issues identified.
Transport and Roads	Amber	Significant improvement to Tuddenham Lane required to accommodate traffic and ped use. Suitability of site may be influenced by Ipswich northern bypass. Assess in conjunction with adjacent sites.
Compatibility with neighbouring uses	Amber	A prominent water tower adjoins the site. The site is separated from the nearest built up area by sports pitches and its impact on the urban – rural fringe of the Ipswich urban rea would need to be considered alongside larger adjacent site 1087.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable. Issues to be addressed include; access, landscape / townscape, highways impacts, and compatibility with neighbouring uses.
------------------------	--

Availability

Is the site available?	Yes
Evidence of availability / comments	Submission on behalf of all landowners

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Estimated dwellings yield	148
Estimated employment land yield (hectares)	
Estimated retail floorspace (sqm)	
Estimated commencement date	2023/24

Site Details

Parish / Town	Rushmere St Andrew
Site reference	1083 Land opposite 309-405 Humber Doucy Lane, Rushmere St Andrew
Site Area (hectares)	9.9
Proposed use	Housing
Existing land use	Agricultural land
Neighbouring land uses	Water tower adjoins the site.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Vehicle access would be provided through land in Ipswich Borough. Improvements to Tuddenham Lane junction would be required.
Utilities capacity	Green	No issues identified.
Utilities infrastructure	Green	Water Tower adjoining the site.
Contamination	Green	No issues identified.
Flood Risk	Green	No issues identified.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Amber	Potential for landscape impact on urban edge, and for coalescence if considered with other sites in the vicinity.
Biodiversity	Green	No issues identified.
Historic Environment	Green	No issues identified.
Open Space	Green	No issues identified. Note that site is submitted with site 805 which is put forward for open space / sports pitch uses.
Transport and Roads	Amber	Significant improvement to Tuddenham Lane required to accommodate traffic and pedestrian use. Suitability of site may be influenced by Ipswich northern bypass. Assess in conjunction with adjacent sites.
Compatibility with neighbouring uses	Amber	A prominent water tower adjoins the site. A number of sports pitches in vicinity.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable. Issues to be addressed include; access, landscape / townscape, highways impacts, and compatibility with neighbouring uses.
------------------------	--

Availability

Is the site available?	Yes
Evidence of availability / comments	Submission on behalf of all landowners

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Estimated dwellings yield	247
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2023/24

Appendix 7

The economic benefits of the proposed development at Land at Humber Doucy Lane, Ipswich

The proposed development at Doucy Lane will provide up to 660 new homes. This will stimulate economic growth and assist with local housing requirements, whilst also adding to local authority revenues.

The proposal



660 New homes **200+** Affordable homes

Other details: The proposed development will also deliver an early years nursery and 400 sq.m of flexible (Use Class E) floorspace, in addition to amenity and open space.

Construction benefits



£100m
Assumed construction value
(total construction cost)



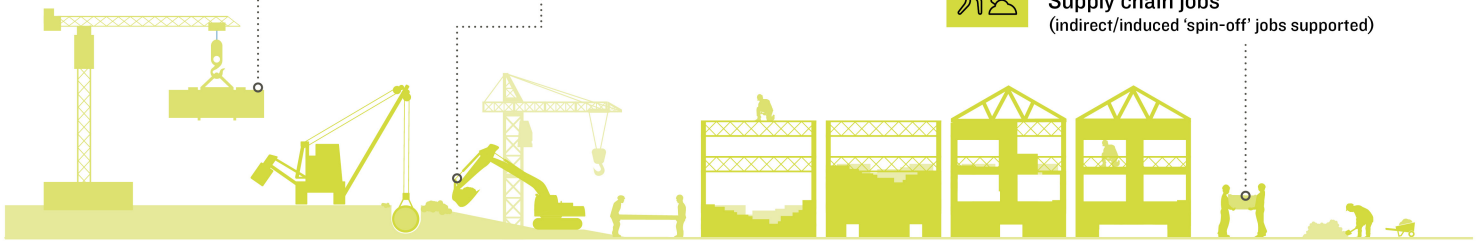
£37.0m GVA
Economic output
(additional GVA p.a.)



150 Jobs
Construction jobs
(temporary jobs over the 10 year build period)



200 Jobs
Supply chain jobs
(indirect/induced 'spin-off' jobs supported)



Operational and expenditure benefits



£1.5m
First occupation expenditure
(spending to make a house 'feel like a home')



28 Direct jobs
(additional jobs from new
commercial/community uses)



7 Supply chain jobs
(indirect/induced jobs supported)



£4.6m
Resident expenditure
(within local shops and services p.a.)



45 Supported jobs
(from increased expenditure in local area)



£1.5m
Economic output
(additional GVA p.a.)

Local Authority revenue benefits



£1.2m
Council Tax revenues
(p.a.) Shared between East Suffolk and
Ipswich Councils



£283,000
Business rate revenues
(p.a.) Shared between East Suffolk and
Ipswich Councils



Appendix 8



IPSWICH
BOROUGH COUNCIL

Ipswich Borough Council Housing Delivery Action Plan 2022

Foreword

The Council's Corporate Plan identifies *"building quality and affordable homes for Ipswich people"* as one of three top priorities for the Borough.

The Council has a target of delivering 8,280 new homes by 2036 and is keen to widen the range of homes, in order to improve the prosperity of the town.

The town planning function is a key driver for improving housing delivery, along with the property, housing, and environmental health functions, which together, can bring about a significant positive change to housing delivery in Ipswich.

This Housing Delivery Action Plan describes the challenges facing the Council in terms of housing delivery and sets out a clear path to address them.

We look forward to working with partners in implementing this plan and delivering new homes for the people of Ipswich.



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Ipswich the Place

Ipswich is the county town of Suffolk and performs a regional role in terms of its population, in delivering growth and how it functions as a major employment, shopping and service centre, and hub for transportation. Ipswich was recently named by TripAdvisor as one of the “*up and coming*” urban areas to live.

The town has a well-connected transport network. Train services provide good and regular access to London (in around 60 minutes) and direct links to Norwich, Cambridge and Peterborough. Ipswich is also closely connected to the trunk road network with the A12 providing access to London, the M25 and Stansted Airport and the A14, linking Ipswich to the Midlands and the Port of Felixstowe.

The population of Ipswich is younger than the county, regional and national averages. The largest age group in Ipswich is the 25–34-year-olds (15.9%). In addition, 23.8% are aged 14 or under. Conversely, only 13.3% of the Ipswich population is aged over 65 years. Ipswich’s history is rich as a port and, in recent years, its Waterfront has been transformed to include hotels, the University campus, the Jerwood Dance House, a range of bars and

cafés and high-quality residential apartments.

Ipswich is a compact town. Nowhere is further than 4 miles from the town centre. It is also a town on a human scale, which lends itself to walking and cycling.

Ipswich is developing dynamically and prosperously and has strong prospects for growth. This growth is supported at a central, sub-regional and local government level, enabling Ipswich to develop while acknowledging the sense of place established by many historic buildings and its large landscaped parks.

Christchurch Park provides one of the largest green spaces in any UK urban centre, and together with the numerous other beautiful parks and open spaces, contributes significantly to the setting of the town. Other attractions include the many historic buildings and numerous theatres, with Ipswich enjoying more National Portfolio Organisations (NPOs) than any other location outside of London.

Beyond, Suffolk boasts a splendid rural backdrop, including a renowned coastal region, Dedham Vale and the mid-Suffolk area, with strong links to Gainsborough and Constable Country.

Local Planning in Ipswich

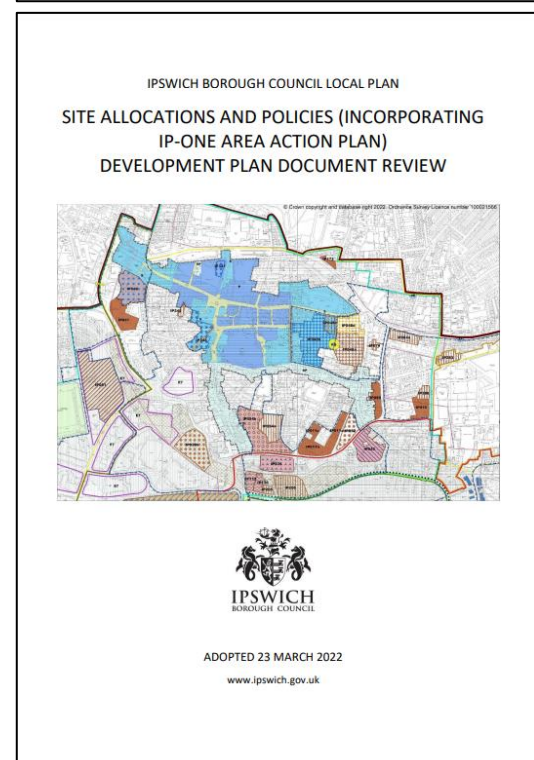
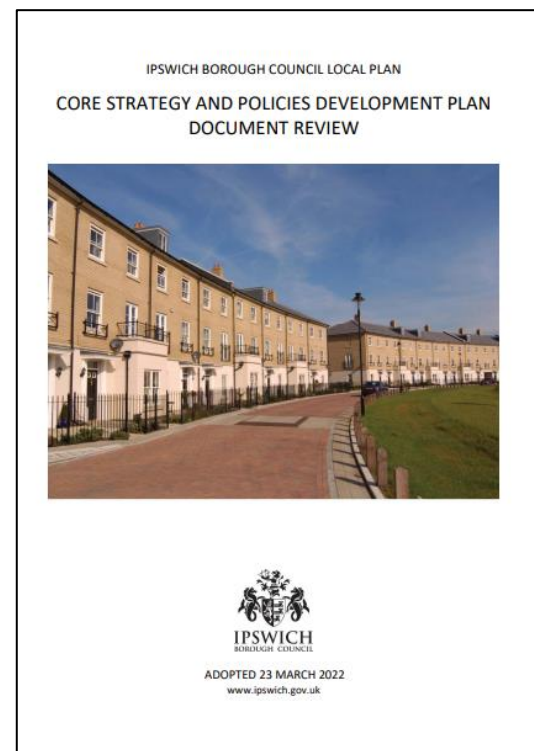
On the 23 March 2022 Ipswich Borough Council adopted its third Local Plan in under ten years. The Local Plan looks forward fifteen years and allocates land for future housing and employment growth, along with planning for infrastructure to support it. The Local Plan also has a function to provide the spatial delivery of all corporate plans and strategies.

With the publication and adoption of the 2022 Ipswich Local Plan on the 23 March 2022 by Full Council, the Borough has a five-year land supply. This is the first time that Borough has had a five-year land supply in twelve years. The newly adopted Ipswich Local Plan also means that the Council has an up-to-date local plan and can meet the Government's requirement for local authorities to have an up-to-date local plan by December 2023.

The Ipswich Local Plan plans the delivery of 8,280 new homes by 2036. This includes around 3,500 new homes at Ipswich Garden Suburb and includes associated infrastructure,

such as a new 24.5ha country park on the northern edge of Ipswich.

Outside of the Ipswich Garden Suburb the focus of new housing is within the central area of the town (IP-One Area).



Housing Delivery in Ipswich

Much of the recent development in the town has been focused around the central area of Ipswich (IP-One Area). Ipswich Waterfront is the location for the largest single regeneration project in the East of England and the focus of significant commercial, cultural and institutional investment.

Whilst Ipswich has seen quality housing delivered across the Borough, the housing market has not delivered the scale of housing needed.

The purpose of this document is to identify what steps the Council needs to take in order to assist with delivering sufficient number and quality of new homes for all. This report examines the current state of play; exploring the challenges and opportunities to build the scale of housing needed in Ipswich.

The Council recognises that it plays a significant role in driving the delivery of new homes. It is committed to making a significant contribution itself both to housing delivery and to the public realm.

The Council has an excellent record of making timely and good decisions. For December 2020 to December 2021, 95% of all planning applications were determined within time. For July 2018 to June 2020 100% of all planning appeals were dismissed. This illustrates the pro-active and positive attitude of the Council.

There are however some things that are beyond the control of the Local Planning Authority, for example the lack of power to properly incentivise the implementation of planning permissions when they are granted. For example, on the 1 April 2022 there were approximately 2,709 dwellings in Ipswich with permission which had not commenced.

The Borough is now entered a delivery phase, prioritising housing delivery over launching straight into the preparation of another Local Plan. This is being assisted through a partnership with Homes England.

Housing Delivery Test

The Housing Delivery Test measures net additional dwellings provided in a local authority area against the homes required to meet local need. The current Housing Delivery Test covers the period between 2018 and 2021.

Where delivery falls below the homes required, policies set out in the National Planning Policy Framework (NPPF) will apply.

The consequences apply concurrently, for example, those who fall below 85% should produce an Action Plan as well as the 20% buffer. The consequences will continue to apply until the subsequent housing delivery test measurement is published the following year.

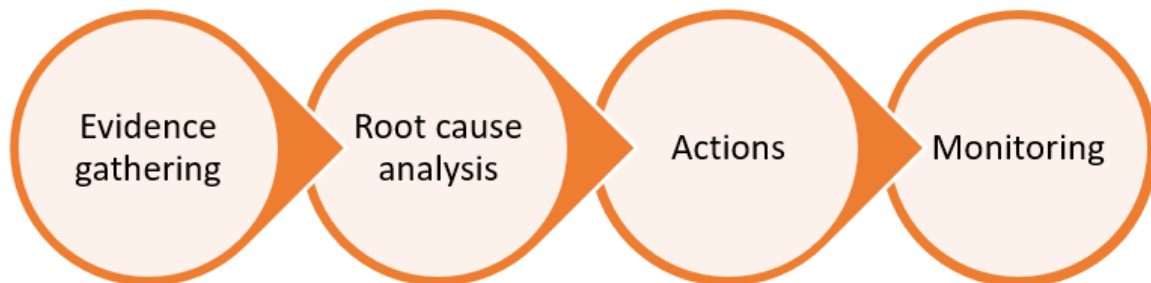
All local planning authorities with less than 95% of the delivery target must prepare an Action Plan.

An Action Plan is intended to be a practical document focussed on effective measures aimed at improving housing delivery in an area and needs to be underpinned by evidence and research.

The 2021 Housing Delivery Test published on 14 January 2022, showed housing delivery at 82% of the requirement in Ipswich between 2018 and 2021 (compared to 64% for the previous three-year period).

This changes the Government's sanction from the 'presumption in favour' to requiring the Council add a 20% buffer to the five-year housing land supply and have an Action Plan in place. The 2022 Ipswich Local Plan has a 20% buffer already incorporated in its supply figures. This means that for the present, the Council is no longer a 'presumption' authority. However, it needs to be remembered that this position is not static and will be reviewed.

Evidence and Root Cause Analysis



The Action Plan process is shown in the diagram above and requires local authorities to understand why delivery in their area is below government expectations.

A range of data sources have been analysed to identify the main local issues and challenges influencing delivery rates. The Action Plan is supported by a background technical paper which collates the relevant data.

Based on the data collected and analysed the Council considers that the main barriers to delivery continue to be:

- The tight, compact urban nature of the borough;
- Higher cost of development and lower land values;

- Low private sector delivery levels of affordable housing;
- The inability of the local planning authority to incentivise delivery of housing, or sanction non-delivery;
- Reliance on brownfield sites; and
- Greenfield sites, which offer fewer constraints, sit outside of Borough boundary.

Key Actions

Through a 'root cause analysis' the Council has identified the main local issues and challenges influencing housing delivery rates. These issues have been used as the basis to evolve actions to boost delivery.

The actions have been devised as part of a collaborative process between key stakeholders including senior staff from the Planning, Property, Private Sector Housing, Tenancy Services and Environmental Health service areas.

The actions comprise a range of short, medium and long-term actions, to help provide immediate improvements to delivery, but also help with long-term planning for growth.



1

Support Private Sector Affordable Housing Provision

1. Support Private Affordable Housing Provision

The Council is committed to increasing the delivery of affordable homes in the Borough. It is keen to see the private sector play its parts in meeting affordable housing need.

The Council is progressing a programme of affordable housing and has plans to build 1,000 new homes in a decade. Furthermore, the Council has invested £11 million in improving its existing housing stock. All of the Ipswich Borough Council homes meet the Decent Homes Standard and enhanced Ipswich Standard.

Working with the private sector is key to accelerating the supply of affordable housing in Ipswich. The Council can outline the necessary housing mix and bedroom numbers required for a particular site to best meet local waiting list demand.

Planning officers can highlight sites to housing service colleagues so they can work in partnership with private developers to help better deliver affordable housing. This work is supported through the Ipswich Housing Strategy 2019-2024.

Finally, the Council is committed to ensuring it has the resources in place to deliver affordable homes. The Council will therefore explore the capacity and resource to strengthening its partnership role.

Actions

- **Improve partnership working to ensure better private sector delivery of affordable housing (medium-term).**
 - **Explore capacity and resource to strengthen the enabling role within the Council (ongoing - short to medium-term).**
-

2

Work with Neighbouring Authorities to Deliver New Homes

2. Work with Neighbouring Authorities to Deliver New Homes

The Council recognises that Ipswich is tightly bounded and by working in partnership with its neighbouring authorities (Babergh & Mid Suffolk Councils, East Suffolk Council and Suffolk County Council), it can, in the future, identify land strategically to deliver housing.

The four authorities have a demonstrable history of working together on strategic planning issues through the Ipswich Strategic Planning Area Board (ISPA Board).

Ipswich Borough Council is working collaboratively with East Suffolk Council to masterplan and deliver residential development and associated infrastructure on land at the North of Humber Doucy Lane, on the eastern side of Ipswich. The development will deliver 449 new homes in Ipswich and a further 150 in East Suffolk, with cross boundary infrastructure provision.

The Council is committed to continuing this work with adjoining authorities through the ISPA Board, in order to develop a sustainable approach to housing delivery beyond the Borough boundary.

The Council will continue to work closely with ISPA authorities to deliver housing jointly for the Ipswich Housing Market Area and progress all opportunities collaboratively as necessary.

Action

- **Work with neighbouring authorities to identify strategic sites to bring forward new housing development and associated infrastructure (ongoing).**
-

3

Monitor and Bid for Infrastructure and Housing Funding

3. Monitor and Bid for Infrastructure and Housing Funding

The Council will take advantage of all relevant funding opportunities to support the delivery of new housing and infrastructure to support housing delivery.

The Council recognises that parts of Ipswich have viability issues arising from high and abnormal development costs and may benefit from upfront funding, and/or other funded support to accelerate the release of land for housing. The Council will seek to bid for funding opportunities which provide upfront capital to facilitate the delivery of new homes.

The Council already has a proven track record of securing appropriate investment. In February 2018, Ipswich Borough Council successfully bid for £9.8 million from the Housing Infrastructure Fund (HIF) from Homes England to facilitate the delivery of 3,500 homes at Ipswich Garden Suburb (IGS). IGS is a strategically important site and will contribute significantly (36%) in meeting the Borough's housing need up to 2036.

The HIF funding is being used to deliver new infrastructure at the site, including a 24.5-hectare country park and two bridges across a main railway line.

The Council has a good record with Homes England. Ipswich Borough Council and Homes England are in regular and structured dialogue in relation to a number of stalled and proposed development sites. Currently Ipswich Borough Council and Homes England are jointly identifying where there is alignment between the Borough Council's priorities and Homes England's strategic priorities, framed by a shared aim to increase housing supply going forward. Discussion will include specific funding streams where applicable and available.

In March 2021 Ipswich was successful in its bid for £25 million from the government's Towns Fund. This fund will assist with the delivery of 11 projects planned for Ipswich town centre, including a new pedestrian and cycle bridge at the Waterfront and the restoration of various buildings, including the Old Post Office on the Cornhill. The Strategy will kick start regeneration of key development sites and encourage inward investment.

An indicative programme is set out within paragraph 29 of the Ipswich Town Investment Plan, which can be viewed on the Council's website. The 10 submitted summary business cases have not yet been approved by HM Government. More work to demonstrate value for money is underway. The Borough Council, as accountable body, is in regular contact with civil servants on this matter.

Action

- **Continue to bid for infrastructure funding to facilitate the delivery of new homes, with a particular focus on securing funding which provides upfront capital (ongoing).**
-

4

Bringing Empty Homes Back into Use.

4. Bringing Empty Homes Back into Use.

An important part of the Council's wider housing strategy is to tackle long term empty homes.

Increasing the number of empty homes bought back into use increases the overall supply of new housing and reduces blight on neighbourhoods. The Council's empty homes policy aims to reduce the number of long-term empty homes in Ipswich returning homes back into use and discouraging owners from leaving properties empty. The objectives of the policy are to provide advice and assistance to those wishing to bring empty homes back into use and where necessary, use appropriate enforcement action to return the property to use.

The Council has an excellent track record of bringing empty homes back into use and has a dedicated officer responsible for working with the owners of properties left unoccupied for extended periods. Through the Council's empty homes policy, the number of long-term empty homes has fallen from 941 in 2008 to 368 in 2018.

In 2021/22 Ipswich's Private Sector Housing Team assisted in bringing 21 long term empty properties back into use.

The Council's annual target for restoring empty homes back into use is 50. This is 10% of the estimated number of long-term empty properties in Ipswich. Based on previous results, it is expected that the majority (80%) of empty homes will be brought back to use as a result of encouragement letters sent to owners. It is expected that 10% will be brought back into use via grants and 10% via enforcement action.

In previous years the Council has exceed its target for restoring the number of empty homes back into use, increasing the overall supply of new sustainable homes. However, during 2020/21 and 2021/22 there was a decline in the number of empty homes brought back into use due to the Coronavirus pandemic. Officers were unable to visit, and property owners were unable to engage building contractors.

The Borough's performance on empty homes remains exemplar.

Action

- **Continue to work with the owners of homes left vacant for extended period in order to meet the Council's annual target of restoring 50 empty homes back into use (ongoing).**
-

5

Work with Small and Medium Sized Builders to Facilitate the Delivery of New Homes

5. Work with Small and Medium-Sized Builders (SMEs) to Facilitate the Delivery of New Homes

Approximately one third of all new homes in Ipswich are delivered on smaller sites of between one and ten dwellings. The majority of these sites are developed by small and medium sized developers who play a critical role in helping to meet our housing need.

Small sites are important to the Council's overall housing supply as they typically build out more quickly and provide additional choice in the type and design of housing.

The Council aims to boost opportunities for small and medium sized house builders by providing a dedicated list of small sites (suitable for ten units or less). The small sites register will include details of the site constraints to help reduce the development risks.

The Council's own housing sites will look to make use of small and medium sized local businesses as appropriate, to build out their own smaller development sites.

Action

- **Create small sites register (10 units or less) to promote development opportunities for small and medium sized housebuilders (ongoing - short to medium-term).**
 - **Support our Housebuilding Company, Handford Homes, to develop the local construction market to enable local small and medium sized construction firms to bid for the construction of new council housing (ongoing - short to medium-term).**
 - **Engage with developers to progress those sites which have consent but have not commenced on site (ongoing – short to medium-term).**
-

6

Review S106 Procedures for Housing Applications

6. Review Section 106 Procedures for Housing Applications

Section 106 of the Town and Country Planning Act is the Council's preferred approach to securing high-quality mitigation to make proposals acceptable.

The Council recognises the importance of timely negotiation and agreement of developer contributions and is working to reduce the time taken to complete Section 106 Agreements by carrying out preparation of draft agreements alongside planning application processing, thus accelerating the decision making process.

Going forward, the Council will continue to encourage engagement at the pre-application stage (see Action 7) of the planning process so that issues are resolved, and a package of obligations are agreed in principle with the applicant before the planning application is considered. This will provide greater certainty for developers and greater transparency to the local community.

The Council will work to ensure that affordable housing is provided through S106 Agreements to reflect the Council's corporate housing priority.

The Council has prepared a standardised template Section 106 Agreement. The template will be published online so applicants are clear about the documentation they are required to provide as part of the planning application process.

The Council is actively engaging with Suffolk County Council (SCC) on updated an SCC Developers Guide to Infrastructure Contributions in Suffolk. The guide is intended to improve transparency and consistency in planning obligation requirements by providing guidance to developers and all stakeholders involved in the development process.

Finally, the Council is committed to ensuring it has the resources in place to agree, process and monitor planning obligations under (Section 106 Agreements). To this end the Council has recruited a dedicated officer to support the delivery of planning services.

Actions

- **Promote early S106 negotiations with the aim of agreeing a package of obligations in principle with the applicant as part of the pre-application discussions (ongoing – short-term).**
 - **Prepare and publish a standardised template Section 106 Agreement (ongoing - short-term).**
 - **Recruit a dedicated officer to support Section 106 Agreement progression and monitoring (complete - short-term).**
 - **Work collaboratively with SCC regarding S106s to progress agreements more quickly and clearly, and to ensure that requested contributions are fully justified and viable (ongoing – short-term).**
-

7

Promote Use of the Pre-applications Service

7. Promote Use of the Pre-applications Service

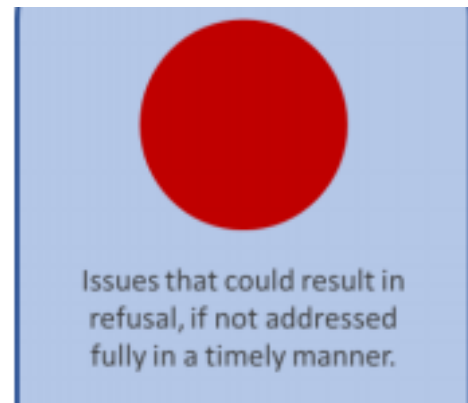
Ipswich Borough Council is committed to improving its pre-application advice process. The main aim is to simplify the process and focus on issues essential to securing planning permission.

The Council is reviewing its pre-application procedures and introducing a traffic light assessment format for pre-application feedback. Issues discussed at pre-application will be rated as red (issues that could result in refusal), amber (issues that require further information or clarification) and green (issues that are resolved or agreed). This enables the main messages to be communicated clearly. The Council will also look to clarify the next stages, creating a clearer route map for applicants.

The greater focus on resolving issues from the beginning will improve the quality of applications. This will also lead to a more efficient and timely application process.

Actions

- Review our pre-application advice process by introducing a traffic light assessment format and creating a clear route map for applicants (complete - short-term).
-



8

Review Application Procedures

8. Review Application Procedures

The Council is committed to delivering efficient and high-quality development management services.

The Council has recently acquired work flow software. This technology has helped to increase business efficiency and productivity.

The greater focus on identifying and resolving issues will lead to a more efficient and a timely planning application process.

The Council is currently undertaking a full review of its Local Validation List. In order for applications to be assessed effectively and expeditiously, it is important that local validation requirements are met. Updating the Local Validation List will provide applicants with greater certainty about the application process. Consultation on the draft Local Validation List will take place in September 2022.

It will also improve the quality and detail of application submissions, allowing applications to be assessed effectively, expeditiously and with full transparency.

Actions

- **Review the Local Validation List to enable applications to be assessed effectively and expeditiously (ongoing - short-term).**
 - **Use Enterprise software to increase business efficiency and productivity (complete - short-term).**
-

9

Place Marketing and Promotion to
Stimulate and Grow Market Interest

9. Place Marketing and Promotion to Stimulate and Grow Market Interest

There is a need to encourage developers and investors into Ipswich to increase the quantity of housing being delivered.

The Council will undertake a more coordinated and corporate approach to place marketing. Place marketing and promotion will be used to actively promote Ipswich and its key development locations to stimulate market interest and consumer demand.

Place marketing will stress that there has never been a better time to invest in Ipswich. It will set out the unique selling points of the town, including its heritage assets, the Waterfront, the fact that it has a well-connected transport network with train services providing access into London in just over an hour and links to Norwich, Cambridge and Peterborough.

It will emphasise that Ipswich Borough Council is keen to work with housebuilders and developers to deliver the homes required.

Place marketing and promotion will be backed up with continued efforts to de-risk development in less viable locations, through the provision of gap funding and infrastructure investment to remove as many abnormal costs as possible.

Actions

- **Investigate opportunities to work with partners to market the town (short-term to medium-term).**
 - **Provide an ‘opportunities map’ of key development sites in priority areas for growth (linked to the Local Plan) (short to medium-term).**
-

Implementation

The actions comprise a range of short, medium and long-term actions to help provide immediate improvements to delivery, but also help with long-term planning for growth.

Theme	Actions	Timeframe for Implementation
<ul style="list-style-type: none"> ▪ Support Private Sector Affordable Housing Provision 	<ul style="list-style-type: none"> ▪ Improve partnership working to ensure better private sector delivery of affordable housing. 	To be commenced
	<ul style="list-style-type: none"> ▪ Explore capacity and resource to strengthen the enabling role within the Council. 	HE capacity pilot seeks to address this – Ongoing Jan - Dec 2022
<ul style="list-style-type: none"> ▪ Work with Neighbouring Authorities to Deliver New Homes 	<ul style="list-style-type: none"> ▪ Work with neighbouring authorities to identify strategic sites to bring forward new housing development and associated infrastructure. 	Ongoing – supported through ISPA Board
<ul style="list-style-type: none"> ▪ Monitor and Bid for Infrastructure and Housing Funding 	<ul style="list-style-type: none"> ▪ Continue to bid for infrastructure funding to facilitate the delivery of new homes, with a particular focus on securing funding which provides upfront capital. 	Ongoing – supported by HE
<ul style="list-style-type: none"> ▪ Bringing Empty Homes Back into Use. 	<ul style="list-style-type: none"> ▪ Continue to work with the owners of homes left vacant for extended period in order to meet the Council's annual target of restoring 50 	Ongoing – progress slowed due to pandemic

	empty homes back into use.	
<ul style="list-style-type: none"> ▪ Work with Small and Medium-Sized Builders (SMEs) to Facilitate the Delivery of New Homes 	<ul style="list-style-type: none"> ▪ Create small sites register (10 units or less) to promote development opportunities for small and medium sized housebuilders. 	Ongoing – work commenced but yet to completed
	<ul style="list-style-type: none"> ▪ Support our Housebuilding Company Handford Homes to develop the local construction market to enable local small and medium sized construction firms to bid for the construction of new council housing. 	Ongoing
	<ul style="list-style-type: none"> ▪ Engage with developers to progress those sites which have consent but have not commenced on site. 	Ongoing – proforma for 5 year land supply delivered and focussed work with HE on market failed sites
<ul style="list-style-type: none"> ▪ Review Section 106 Procedures for Housing Applications 	<ul style="list-style-type: none"> ▪ Promote early S106 negotiations with the aim of agreeing a package of obligations in principle with the applicant as part of the pre-application discussions. 	Complete
	<ul style="list-style-type: none"> ▪ Prepare and publish a standardised template Section 106 Agreement. 	Produced but not yet published

	<ul style="list-style-type: none"> Recruit a dedicated officer to support Section 106 Agreement progression and monitoring. 	Action complete – monitoring officer in post
	<ul style="list-style-type: none"> Work with SCC regarding S106s to make them quicker and clearer, and that specific contributions are justified. 	Consultation completed – action due to completed by end of summer 2022
<ul style="list-style-type: none"> Promote Use of the Pre-applications Service 	<ul style="list-style-type: none"> Review our pre-application advice process by introducing a traffic light assessment format and creating a clear route map for applicants. 	Completed
<ul style="list-style-type: none"> Review Application Procedures 	<ul style="list-style-type: none"> Review the Local Validation List to enable applications to be assessed effectively and expeditiously. 	Ongoing – consultation due to commence in September 2022
	<ul style="list-style-type: none"> Use Enterprise software to increase business efficiency and productivity. 	Complete – Enterprise software updated, operational from 11 July 2022
<ul style="list-style-type: none"> Place Marketing and Promotion to Stimulate and Grow Market 	<ul style="list-style-type: none"> Investigate opportunities to work with partners to market the town. 	Yet to commence
	<ul style="list-style-type: none"> Provide an ‘opportunities map’ of key development sites in priority areas for growth (linked to the Local Plan). 	Yet to commence

The Council is committed to delivering and monitoring the progress on these actions.

Key to implementation table

Ongoing	=	Work has commenced
Short-term	=	12 - 18 months
Medium-term	=	19 - 36 months
Long term	=	36 months or more

Monitoring

Council has adopted and embedded a corporate approach to publishing an annual Housing Delivery Action Plan which is designed to drive housing delivery forward and is a material consideration in decision-making.

The actions will continue be implemented and monitored regularly by an officer steering group, comprising staff from the Planning, Property Services, Private Sector Housing, Tenancy Services, Economic Development and Environmental Health teams.

The group meet quarterly to ensure actions are being taken forward in a timely manner. Implementation requires collaboration across the departments, corporate management team and in association with the private sector developers and affordable housing.

The plan and actions will be reviewed and updated annually.



Useful Links

Ipswich Housing Strategy 2019-2024 -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/finalhousing_strategy_-_2019_-_2024.pdf

Adopted 2022 Ipswich Borough Council Local Plan

Core Strategy and Policies Development Plan Document Review -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/core_strategy_and_policies_development_plan_document_7_maps.pdf

Adopted 2022 Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/site_allocation_s_and_policies_dpd_0.pdf

Strategic Housing and Employment Land Availability Assessment -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/shelaa_january_2020_final.pdf

Appendix 9



PROOF OF EVIDENCE

LAND NORTH-EAST OF HUMBER DOUCY LANE, IPSWICH

Prepared by: Matthew Kennington BSc (Hons) MSc

Date: December 2024

Doc Ref: 378_PoE_01_V4

Appeal Ref: APP/X3540/W/3350673

I. SUMMARY

DOCUMENT REVISION:	V2 – December 2024
DOCUMENT REFERENCE:	378_PoE_01_V2
CLIENT:	Barret David Wilson Homes Ltd / Hopkins Homes Ltd
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1.0 EXPERIENCE AND QUALIFICATIONS

- 1.1 I hold a post graduate Masters with Distinction in Building Conservation from Anglia Ruskin University, Chelmsford (2014); a First Class Bachelor of Science with Honours in Architectural Technology from Anglia Ruskin University, Chelmsford (2011), and an HNC in Construction from Colchester Institute (2007).
- 1.2 I have 20 years of experience in practising Architecture, 15 of which are directly related to projects within the historic environment. I have worked as a Conservation Specialist within the private sector for much of that time, specialising in heritage structures, the historic environment and planning policy/ legislation. My project portfolio spread across residential, renovation, commercial, healthcare and education sectors, ranging from brief and concept through to completion. This involves grade II and II* listed buildings, scheduled ancient monuments and locally listed buildings, as well as designated Conservation Areas.
- 1.3 In 2015, I was appointed by Historic England as an Inspector for Historic Buildings and Areas, dealing with the government organisations remit relating to the historic environment. Specifically, I dealt with grade I and II* listed buildings and conservation areas. This role allowed me to further expand my knowledge of highly designated listed buildings and fully facilitate the implementation of skills learnt within the MSc in Building Conservation.
- 1.4 I have undertaken a number of additional training courses, including the highly rated SPAB Spring Repair Course in 2012. From 2012 to 2016, I was involved within the local Suffolk SPAB Group, as an active member and regional Secretary.
- 1.5 I have presented a number of technical courses, including 'The Use of Lime', Sustainability & Heritage Buildings' and 'Energy & Heritage Buildings', to a variety of groups.
- 1.6 During my career, I have been involved in a wide variety of projects relating to changes to the historic environment, and been a key decision maker in highly sensitive and significant schemes and developments.
- 1.7 I was approached in July 2023, asking to be involved within the design team for the Appeal site, owing to my familiarity to the adjacent Westerfield House where I undertook the Heritage advice for a significant development, as well as previous experience of working with Hopkins Homes Ltd.
- 1.8 In August 2023, I undertook the initial site visit and began assessment work in anticipation of the developing scheme. Given that there had been significant work already undertaken as part of the site allocation, much of the initial investigations were assessing previous findings and applying my own analysis to the emerging parameter plans, and ultimately the developing scheme. I was part of the team for the majority of the Design Team Meetings, as well as included in pre-application discussions with the LPA, and further assisted in influencing the layout viewed from a heritage perspective.
- 1.9 I wrote the Heritage Impact Assessment (HIA) and applied my knowledge of the National Planning Policy Framework to the scheme. The evidence which is provided for the Appeal within this Statement is given as an addition to the original HIA and I confirm the opinions expressed are my true and professional opinions.

2.0 INTRODUCTION AND SCOPE OF EVIDENCE

The Scope of my Evidence

- 2.1 The original HIA addressed all heritage assets, designated or otherwise, in the vicinity. The common ground as part of decision making and follow up narrative confirms:
1. That the principle areas of concern at the two grade II listed buildings to the north of the site, Lacey's Farmhouse and Allens House.
 2. The impact on these two properties in heritage policy terms, is defined as less than substantial harm, on the lower end.
- 2.2 Therefore, my evidence will be targeted solely at these two properties, and ascertain the following:
1. Clarify the nature of the harm in drawn form.

The Site

- 2.4 The application site is situated to the north-east of Ipswich and bridges two local authorities, Ipswich Borough Council and East Suffolk Council. It lies north of Humber Doucy Lane, and is bounded to the west by Tuddenham Road, on the north by the Greater Anglia Railway line and to the east with Seven Cottages Lane. The site wraps around Ipswich Rugby Club and Westerfield House as key markers near the site. The total site area of 31.52 ha covers more than one parcel of land and is being considered as a single scheme as part of this assessment.



Fig: Application site (PRP), shown edged in red

- 2.5 The site itself is largely arable farm fields, fairly level with a 4m height differential west to east. There are a nearby of Heritage Assets nearby, with designated assets located as per the below image, References are included for this section only to provide locators for the subsequent section.
- 2.6 The heritage assets referred to within this proof are annotated B and C.

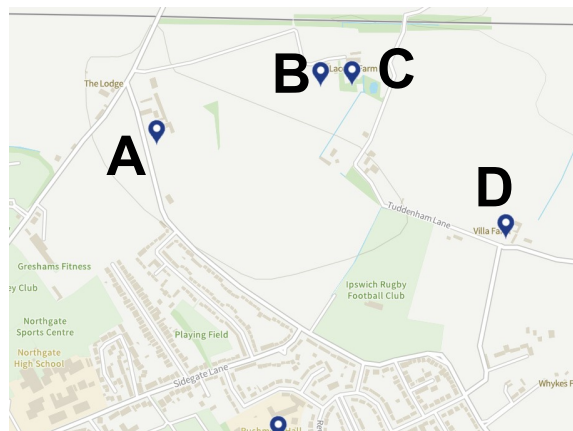


Fig: HIA's site (www.historicengland.gov.uk)

3.0 BACKGROUND, POLICY & IMPACT

- 3.1 My HIA assessed the significant of the assets and the impact of changes on the two relevant designated heritage assets:

The views into and away from the Heritage Asset are important and, where appropriate, would contribute to the appreciation of the building and therefore to the qualities that make its significance. These views are not limited to areas of public access. Long range views into and out of the site have been considered and in this instance the views of the Heritage Assets nearby are more limited than one might expect on plan, due to the rural nature of the area and heavy surrounding planting, ground contours and large area which is being considered.

The character of this setting is rural. The Heritage Asset itself is prominent, although in context within the conservation area is minor. The site clearly visible from the road and the frontage contributes positively to the character of the area to a degree which exceeds any other view. The lack of major change to any immediate or wider settings of the heritage assets means that the impact is minimal in terms of the NPPF.

The changes described within the previous sections occur as a result of the development principle, and no degree of design development will completely alleviate change in fields nearby heritage assets. Therefore, the actions and devices used as part of the layout has best protected the areas of the site which have most potential to create change in setting. These changes, as defined in policy terms, are considered less than substantial, being on the lower side, but certainly a bit more than none.

- 3.5 Within the Statement of Common Ground, it is agreed:

6. *The parties agree that the proposed development will harm the significance of Allens House and Lacey's Farmhouse. There will be a "low level" of less than substantial harm.*

4.0 REASON FOR REFUSAL #4

4.1 Whilst the level of harm is agreed within the decision making process and following Statement of Common Ground, the following items are also agreed.

8. *The parties also agree that, despite the policy requirement, the allocation site could not be developed for the amount of houses provided for in the allocation (599) in a manner which would avoid, or materially reduces, the level of harm to the significance of Allens House and Lacey's Farmhouse.*

9. *The relevant national planning policy test for the decision maker is as set out in Paragraph 215 (previously stated as 208 in the SoCG as per current policy) of the NPPF, as follows:*

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal ..."

5.0 CONCLUSIONS ON REASON FOR REFUSAL

- 5.1 Therefore, it is concluded that there is no heritage dispute between parties.
- 5.2 In heritage terms, the weighted balance to be determined should be referred to the planning evidence of Mr Coleman within his proof, in accordance with Paragraph 215 (formerly para 208) of the NPPF, *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal'*.

Appendix 10

Technical Note:

Air Quality

**Land Northeast of Humber Doucy
Lane, Ipswich, IP4 3QA**

For Barratt David Wilson Homes & Hopkins Homes

20 December 2024

Document Control

Project Title:	Air Quality
Project Number:	J10-14994B-10
Client:	Barratt David Wilson Homes & Hopkins Homes
Principal Contact:	Kevin Coleman (Phase2Planning)
Document Title:	Land Northeast of Humber Doucy Lane, Ipswich, IP4 3QA
Document Number:	J10-14994B-10-2
Prepared By:	Dr Denise Evans

Revision History

01 20/12/2024



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1 Introduction

- 1.1 This note considers the findings of the Air Quality Assessment (hereafter referred to as the 'AQA') prepared in February 2024¹ in light of the reasons for refusal of planning permission for the proposed residential development on land northeast of Humber Doucy Lane in Ipswich. The proposals are for the construction of up to 660 dwellings, up to 400 m² floorspace of Class E and/or Class F2(b), and an Early Years facility (hereafter referred to as the 'Proposed Development').
- 1.2 The reason for refusal relating to air quality set out by Ipswich Borough Council (IBC) states:
- "A suite of potential Type 3 measures is outlined in the Damage Costs Note, including low emission transport, cycling facilities, air quality monitoring programs, and information services. The measures proposed by the applicant in their damage cost calculations are judged to be insufficient to mitigate the harm arising through this development, and it therefore cannot be concluded that the proposed development would accord with the NPPF (paragraph 192) and Local Plan Policy DM3."*
- 1.3 Whilst that set out by East Suffolk Council (ESC) states:
- "A suite of potential Type 3 measures is outlined in the Damage Costs Note, including low emission transport, cycling facilities, air quality monitoring programs, and information services. The measures proposed by the applicant in their damage cost calculations are judged to be insufficient to mitigate the harm arising through this development, and it therefore cannot be concluded that the proposed development would accord with the NPPF (paragraph 192) and Local Plan Policies SCLP10.3 (Environmental Quality) and SCLP11.2 (Residential Amenity)."*
- 1.4 This note will:
- describe the baseline air quality conditions;
 - summarise the policy context for the assessment; and
 - provide a brief overview of the findings of the AQA.

¹ AQC (2024), Air Quality Assessment: Land Northeast of Humber Doucy Lane, Ipswich (Report Reference: J10/14994A/10/F2)

2 Baseline Air Quality Conditions

- 2.1 The Proposed Development is located to the northeast of Ipswich, approximately 3.2 km from Air Quality Management Area (AQMA) No. 1, which is within the study area of the assessment. The most recent Ipswich Air Quality Annual Status Report (ASR)² recommended revocation of this AQMA, in agreement with Defra. The recommendation is based on the objective having been met within the AQMA for five years.
- 2.2 IBC carries out monitoring of nitrogen dioxide concentrations at a number of sites across the Borough. Data presented in the AQA for monitoring sites within the study area confirmed that there were no measured exceedances of the annual mean objective in 2022; more recent monitoring data, taken from IBC's latest ASR², confirm that at all monitoring sites within the study area, concentrations in 2023 were lower than the 2022 values, with the exception of IPS3 where the concentration was the same. The highest measured concentration within the study area in 2023 was 33.6 µg/m³, recorded at monitoring site 18.

Table 2-1: Summary of Annual Mean Nitrogen Dioxide Monitoring (µg/m³)

Site ID	Site Type	Location	2019	2020	2021	2022	2023
IPS3	Roadside	Chevallier Street	26.0	20.7	23.0	20.0	20.0
2	Roadside	Chevallier Street	38.0	30.1	30.9	33.7	31.0
7	Roadside	Bramford Road	30.0	23.4	25.4	26.2	23.4
8, 9	Roadside	Bramford Road	32.0	25.4	29.1	28.4	26.6
13	Roadside	Bramford Lane	23.0	18.3	20.4	19.8	18.0
14	Roadside	Chevallier Street	41.0	32.1	34.2	33.1	32.2
16	Roadside	Valley Road / Westwood Ct	33.0	25.6	27.3	28.3	26.9
18	Roadside	Yarmouth Road	41.0	33.4	36.3	37.4	33.6
28	Roadside	Chevallier Street	35.0	26.4	29.6	29.7	27.0
36	Roadside	Valley Road	31.0	22.8	22.6	24.6	22.8
43	Roadside	Bramford Rd / Yarmouth Rd	36.0	28.8	30.9	32.4	28.7
44	Roadside	Bramford Road	34.0	26.1	30.4	30.4	26.5
48	Roadside	Valley Road	25.0	19.0	20.7	21.6	21.0
60	Roadside	Colchester Road	28.0	20.5	21.8	22.5	20.0
61	Roadside	Valley Road	38.0	28.3	30.2	31.2	29.4
Objective			40				

° Exceedances of the objective are shown in bold.

- 2.3 Current and future concentrations at representative receptors within the study area were predicted using a dispersion model (ADMS-Roads), taking account of future traffic growth and projected vehicle emissions reductions. The results, which are consistent with the measured data, confirmed that in both

² IBC (2024), 2024 Air Quality Annual Status Report (ASR)

the current and future baseline scenarios, concentrations remain below the objective, with concentrations in the future year scenario being lower at all receptors than currently.

3 Air Quality Policy and Guidance

- 3.1 This section provides a summary of the local and national air quality policy and guidance relevant to the reasons for refusal.

National Planning Policy Framework

- 3.2 The National Planning Policy Framework (NPPF)³ sets out planning policy for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives, one of which (Paragraph 8c) is an environmental objective:

"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".

- 3.3 To prevent unacceptable risks from air pollution, the NPPF states in relation to the achievement of a Local Plan's environmental objectives (Paragraph 33) that:

"Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."

- 3.4 The NPPF makes clear in Paragraph 199 (formerly Paragraph 192⁴) that:

"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan".

- 3.5 The NPPF is supported by Planning Practice Guidance (PPG)⁵ (Ministry of Housing, Communities & Local Government, 2019), which provides guidance on options for mitigating air quality impacts, as well as examples of the types of measures to be considered. It makes clear that:

"Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact".

³ Ministry of Housing, Communities & Local Government (2024), National Planning Policy Framework <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

⁴ The paragraph number referenced within the reasons for refusal relates to the December 2023 version of the NPPF.

⁵ Ministry of Housing, Communities & Local Government (2019), Planning Practice Guidance <https://www.gov.uk/government/collections/planning-practice-guidance>

Ipswich Local Plan

- 3.6 The Ipswich Local Plan, which comprises the Core Strategy and Policies Development Plan document and Development Management Policies document, was reviewed in 2022. The Adopted Ipswich Local Plan Review 2018 - 2036⁶ includes Policy DM3 'Air Quality', which states:

"The Council will ensure that the impact of development on air quality is mitigated and ensure that proposals do not negatively impact on existing air quality levels in the Borough.

The Council will take into account the impact of air quality when assessing development proposals, through consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.

Development proposals should not:

a) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;

b) reduce air quality benefits that result from the Borough Council's activities to improve air quality; and

c) create unacceptable risk of exposure to high levels of poor air quality, for example, through having a negative impact on an existing AQMA.

An Air Quality Assessment (AQA) will be required where development proposals are likely to expose residents to unacceptable levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.

Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

Development should be consistent with the actions identified in the Council's Air Quality Action Plan, where appropriate."

- 3.7 IBC has also adopted a Low Emissions Supplementary Planning Document (SPD)⁷. The main aim of the SPD is to "improve air quality across Ipswich through new development", either by "preventing new emission sources or encouraging emission reductions, physical activity and healthy lifestyle choices". The SPD outlines what should be included in an air quality assessment depending on the scale of development, and for large developments provides a protocol for calculating the damage costs, along with guidance on the measures which should be incorporated within the development, as appropriate and deliverable, based on the value of the calculated damage cost.

- 3.8 The guidance in the IBC SPD assumes that "if the appropriate mitigation measures are incorporated into development proposals, small and medium schemes should not have a significant impact on air quality. In addition to Type 1 and Type 2 mitigation, the largest schemes **may** require additional Type 3 mitigation which is determined in scale by the calculation of emission damage costs associated with the scheme" (emphasis added). The SPD sets out examples of Type 3 mitigation, and states "The lists of potential mitigation measures are not exhaustive and further options may be suggested where

⁶ IBC (2022), Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review

⁷ IBC (2021), Low Emissions Supplementary Planning Document

the Council consider it appropriate, depending on the scale of development and air quality issues within an area.... The Council welcomes the opportunity to work with developers to devise innovative measures that will lead to improving local air quality."

East Suffolk Council

- 3.9 The East Suffolk Council Suffolk Coastal Local Plan⁸, adopted in 2020 covers the former Suffolk Coastal District. This includes policy SCLP10.3 (Environmental Quality), which states:

"Development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination:

Development proposals will be considered in relation to impacts on;

- a) Air quality, and the impact on receptors in Air Quality Management Areas;...*

Proposals should seek to secure improvements in relation to the above where possible.

The cumulative effect of development, in this regard, will be considered."

- 3.10 The Local Plan also includes policy SCLP11.2 (Residential Amenity), which states:

"When considering the impact of development on residential amenity, the Council will have regard to the following:...

- g) Air quality and other forms of pollution....*

Development will provide for adequate living conditions for future occupiers and will not cause an unacceptable loss of amenity for existing or future occupiers of development in the vicinity."

Land-Use Planning and Development Control: Planning for Air Quality

- 3.11 Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) have jointly developed guidance on Land-Use Planning and Development Control: Planning for Air Quality⁹. The guidance sets out an approach to determining the significance of air quality impacts of a development. It defines descriptors of the impacts at individual receptors, which take account of the percentage change in concentrations relative to the relevant air quality objective, rounded to the nearest whole number, and the absolute concentration relative to the objective.
- 3.12 The guidance states that, *"it is likely that a 'moderate' or 'substantial' impact will give rise to a significant effect and a 'negligible' or 'slight' impact will not have a significant effect, but such judgements are always more likely to be valid at the two extremes of impact severity."*
- 3.13 The guidance identifies any change in concentrations that is 0% of the air quality objective level, when rounded, (i.e. <0.5%), and changes of 1% (when rounded) where the predicted concentrations is less than 94% of the objective, as 'negligible' and thus 'not significant'. With regard to the annual mean objective for nitrogen dioxide (40 µg/m³) this equates to an incremental change of less than 0.2 µg/m³ always being classified as 'negligible', and changes of less than 0.6 µg/m³ being classified as 'negligible' where the predicted concentration is less than 37.8 µg/m³.

⁸ ESC (2020), East Suffolk Coastal Local Plan

⁹ Moorcroft and Barrowcliffe et al (2017), Land-Use Planning and Development Control: Planning for Air Quality v1.2

- 3.14 The approach set out in this guidance is widely adopted by consultants carrying out air quality assessments, and accepted by local authorities, across the UK.

4 Findings of the AQA

- 4.1 The AQA presented a qualitative assessment of air quality impacts associated with the construction phase, as well as a quantitative assessment of the traffic generated by the proposed development once operational using dispersion modelling. The modelling assumed that the entire development would be operational in 2026, when in reality it is unlikely to be fully occupied before 2030; this provided a conservative assessment of impacts and concentrations, as vehicle exhaust emissions will reduce in future due to the increase in low and zero emission vehicles within the fleet. The assessment also considered the suitability of the site for future occupants. A damage cost calculation was presented along with a discussion of the measures incorporated within the scheme which benefit air quality.
- 4.2 A package of mitigation measures was proposed based on the risk of impacts during construction to minimise dust emissions; with these measures in place, the effects were found to be 'not significant'.
- 4.3 The proposed development has a range of Type 1, 2 and 3 measures included within the design, in line with the IBC Low Emissions SPD. The dispersion modelling assessment found that the additional traffic emissions generated by the proposed development would have a 'negligible' impact on existing air quality conditions, including within AQMA No. 1, based on the EPUK/IAQM guidance.
- 4.4 Air quality conditions for future occupants of the proposed development were shown to be acceptable, with concentrations well below the air quality objectives.
- 4.5 The overall operational air quality effects were therefore found to be '*not significant*', without the need for additional mitigation.
- 4.6 The proposed development was found to be consistent with Policy DM3 of the Ipswich Local Plan, and not to conflict with any of the measures outlined in IBC's Air Quality Action Plan.
- 4.7 The calculated Damage Cost value was £118,375, compared to the cost of design features which minimise emissions associated with the development of over £6,000,000.
- 4.8 Since the assessment was completed, outputs from the Suffolk County Transport Model (SCTM) have become available. A review of the SCTM outputs indicates that the changes in traffic flows brought about by the proposed development on roads within the vicinity of the proposed development site are either not materially different to those assessed in the modelling undertaken for the AQA, or the flows are lower. It is therefore judged that the predicted impact of the proposed development would not be materially different to that presented within the AQA, and the overall operational effect would remain 'not significant'.

5 Summary

- 5.1 IBC and ESC have agreed, via a Statement of Common Ground, the approach to and findings of the AQA, including that the overall operational air quality effects of the development are '*not significant*'.
- 5.2 It is therefore judged that the measures incorporated into the design are appropriate and proportionate (in line with the NPPF and associated PPG).
- 5.3 Additionally, the measures incorporated into the proposed development are consistent with the IBC Low Emissions SPD as they prevent new sources or encourage "*emission reductions, physical activity and healthy lifestyle choices*". As appropriate measures have been designed into the proposed development, the AQA has confirmed that the scheme, as designed, will not result in significant harm to local air quality.

6 Glossary

AQC	Air Quality Consultants
AQMA	Air Quality Management Area
Defra	Department for Environment, Food and Rural Affairs
EPUK	Environmental Protection UK
ESC	East Suffolk Council
Exceedance	A period of time when the concentration of a pollutant is greater than the appropriate air quality objective. This applies to specified locations with relevant exposure
IAQM	Institute of Air Quality Management
IBC	Ipswich Borough Council
$\mu\text{g}/\text{m}^3$	Microgrammes per cubic metre
NPPF	National Planning Policy Framework
Objectives	A nationally defined set of health-based concentrations for nine pollutants, seven of which are incorporated in Regulations, setting out the extent to which the standards should be achieved by a defined date. There are also vegetation-based objectives for sulphur dioxide and nitrogen oxides
PPG	Planning Practice Guidance
SPD	Supplementary Planning Document
Standards	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal

A1 Professional Experience

Dr Denise Evans, BSc (Hons) PhD MEnvSc MIAQM

I hold a Bachelor of Science degree in Environmental Sciences (First Class Honours) and a Doctor of Philosophy in air pollution, obtained from the University of Nottingham in 1999 and 2003, respectively.

I am a member of the Institution of Environmental Sciences and a member of the Institute of Air Quality Management. I have over twenty-five years' experience in air pollution, and have been involved in air quality management and assessment, and input to planning applications for a wide range of schemes, for almost twenty years. I currently hold the position of Technical Director with Air Quality Consultants Ltd (AQC). Prior to re-joining Air Quality Consultants in 2018, I was the Air Quality Technical Lead at SRL Technical Services Ltd, before which I was an Associate at WSP with responsibility for the North & Midlands air quality team.

I have carried out hundreds of assessments for new residential developments, including the identification of mitigation measures where relevant. I have prepared numerous air quality Review and Assessment reports for local authorities. I have also appraised local authority air quality Review and Assessment reports on behalf of the UK governments, and provided support to Defra's Review and Assessment helpdesk. In addition, I have appraised air quality assessments submitted in support of planning applications on behalf of a number of local authorities, and on behalf of the Mayor of London.



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Appendix 11

Ipswich Borough Council Local Plan

Background to the Revised Public Open Space Standards and Surplus and Deficiency Maps

January 2016



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Appendix B Revised Open Space Standards

Category	Populations 2011-2021	Parks and Gardens (in hectares) 2014	Natural & Semi-Natural Space (in hectares) 2014	Amenity Green Spaces (in hectares) 2014	Children's Provision (in hectares) 2014	Young People's Provision (in hectares) 2014	Allotments (in hectares) 2014	Outdoor Sports Facilities (in hectares)	
Total Provision - Existing Open Space (ha)								without Golf	
CENTRAL	27,514	35.10	11.62	6.86	1.16	0.66	3.81	16.55	16.50
NORTH EAST	24,513	0.00	16.47	10.12	1.33	0.43	13.90	78.00	54.70
SOUTH EAST	25,582	24.10	134.12	11.76	2.60	1.77	5.97	24.91	24.91
SOUTH WEST	31,394	89.90	30.81	9.23	2.36	0.68	19.14	41.33	41.33
NORTH WEST	24,381	4.40	9.14	24.22	1.21	0.81	16.62	26.82	26.82
OVERALL	133,384	153.5	202.2	62.2	8.7	4.4	59.4	187.61	164.26
Existing Open Space (ha per 1,000 population)									
CENTRAL	27,514	1.28	0.42	0.25	0.04	0.02	0.14	0.60	0.60
NORTH EAST	24,513	0.00	0.67	0.41	0.05	0.02	0.57	3.18	2.23
SOUTH EAST	25,582	0.94	5.24	0.46	0.10	0.07	0.23	0.97	0.97
SOUTH WEST	31,394	2.86	0.98	0.29	0.08	0.02	0.61	1.32	1.32
NORTH WEST	24,381	0.18	0.37	0.99	0.05	0.03	0.68	1.10	1.10
OVERALL	133,384	1.15	1.52	0.47	0.06	0.03	0.45	1.41	1.23
Consultation Responses %									
More Than Enough		6	3	4	6	2	5	3	3
About Right		68	40	38	40	10	40	35	35
Nearly Enough		13	18	17	18	9	13	20	20
Not Enough		11	33	28	26	65	16	29	29
No Opinion		2	6	13	10	14	26	13	13
RECOMMENDED PROVISION per 1000		1.16	1.53	0.48	0.08	0.04	0.41	1.42	1.24
Balance									
CENTRAL	27,514	3.18	-30.48	-6.35	-1.04	-0.44	-7.47	-22.52	-17.62
NORTH EAST	24,513	-28.44	-21.03	-1.65	-0.63	-0.55	3.85	43.19	24.31
SOUTH EAST	25,582	-5.58	94.98	-0.52	0.55	0.75	-4.52	-11.42	-6.81
SOUTH WEST	31,394	53.48	-17.22	-5.84	-0.16	-0.57	6.27	-3.25	2.40
NORTH WEST	24,381	-23.88	-28.16	12.52	-0.74	-0.17	6.62	-7.80	-3.41
OVERALL	133,384	-1.23	-1.92	-1.83	-2	-0.98	4.75	-1.80	-1.13
Future Balance 2021									
CENTRAL	29,962	0.34	-34.22	-7.52	-1.24	-0.54	-8.47	-26.00	-20.65
NORTH EAST	26,694	-30.97	-24.37	-2.69	-0.81	-0.64	2.96	40.09	21.60
SOUTH EAST	27,858	-8.22	91.50	-1.61	0.37	0.66	-5.45	-14.65	-9.63
SOUTH WEST	34,187	50.24	-21.50	-7.18	-0.38	-0.69	5.12	-7.22	-1.06
NORTH WEST	26,550	-26.40	-31.48	11.48	-0.91	-0.25	5.73	-10.88	-6.10
OVERALL	145,250	-14.99	-20.07	-7.53	-2.97	-1.45	-0.11	-18.65	-15.85
NB 2021 Total based on PMP method									