

Report to Ipswich Borough Council

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Inspectors appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Ipswich Borough Council Local Plan Review 2018-2036

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Abbreviations used in this report

AA	Appropriate Assessment
AAP	IP-One Area Action Plan
AMR	Authority Monitoring Report
ANA	Accommodation Needs Assessment
AONB	Area of Outstanding Natural Beauty
AQA	Air Quality Assessment
AQMA	Air Quality Management Area
AQMR	Air Quality Monitoring Report
CSH	Code for Sustainable Homes
CSP	Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document (DPD) Review – Final Draft
dpa/dph	Dwellings per annum/dwellings per hectare
DtC	Duty to Co-operate
ELSA	Employment Land Supply Assessment
ESNA	Economic Area Sector Needs Assessment
ES	Environmental Statement
FEA	Functional Economic Area
FRA	Flood Risk Assessment
ha	Hectares
HDL	Humber Doucy Lane
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IGS	Ipswich Garden Suburb
ILPR	Ipswich Borough Council Local Plan Review 2018-2036 (comprising the CSP and SAP)
ISPA	Ipswich Strategic Planning Area
LDS	Local Development Scheme
LEA	Local Education Authority
LEP	New Anglia Local Enterprise Partnership
LHN	Local Housing Need
LPA	Local Planning Authority
MMs	Main Modifications
MoU	Memorandum of Understanding
NPPF	National Planning Policy Framework, July 2021
OAEN	Objectively Assessed Employment Need
OAHN	Objectively Assessed Housing Need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RAMS	Recreational Disturbance Avoidance Mitigation Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SANG	Suitable Alternative Natural Greenspace

SAP	Ipswich Borough Council Local Plan Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review – Final Draft
SCC	Suffolk County Council
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHELAA	Strategic Housing and Employment Land Availability Assessment
SHMA	Strategic Housing Market Assessment Update 2019
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TMS	Transport Mitigation Strategy
UCO	The Town and Country Planning (Use Classes) Order 1987
WMS	Written Ministerial Statement
WPVA	Whole Plan Viability Assessment
WRC	Water Recycling Centre

Non-Technical Summary

This Report concludes that the Ipswich Local Plan Review (the Plan), which comprises the Core Strategy and Policies Development Plan Document (DPD) Review (the CSP) and the Site Allocations and Policies (Incorporating IP-One Area Action Plan (AAP)) DPD Review (the SAP), provides an appropriate basis for the planning of the Borough, provided that a number of Main Modifications (MMs) are made to it. Ipswich Borough Council (the Council) has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the Hearing, the Council prepared schedules of the proposed MMs and, where necessary, carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of them. The MMs were subject to public consultation over an eight-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the SA and HRA and all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- Amendments to strategic policies and supporting text in chapter 8 of the CSP, to ensure the spatial strategy is effective and consistent with national policy in delivering sustainable development by not increasing the risk of flooding, enabling delivery of the infrastructure necessary to support growth, supporting a 15% shift in journeys away from the car to sustainable modes of transport, and contributing towards achieving compliance with air quality limit values;
- Increasing the housing requirement to 8,280 dwellings to ensure it is justified and consistent with the standard method for Local Housing Need;
- Alterations to the housing land supply to include a housing trajectory in line with national policy and to up-date the 5 year supply position to reflect the deliverability of site allocations;
- Changes to Policy ISPA4 for the cross-boundary housing allocation at Humber Doucy Lane (HDL), to ensure it is consistent with the adopted policy in the Suffolk Coastal Local Plan, contains the measures necessary to mitigate its impacts, and its delivery is phased to co-ordinate with the provision of additional school places;
- Alterations to Policy CS10 for the strategic site at Ipswich Garden Suburb (IGS), to ensure it is effective in guiding the masterplanning and delivery of the remaining phases of the development;
- Modifications to Policy CS11 for Gypsy and Traveller Accommodation to require the allocation of land at West Meadows and changes to the criteria for determining applications for windfall sites, to ensure the Plan is positively prepared and consistent with national policy in meeting accommodation needs over the plan period;

- Amendments to Policy CS12 on Affordable Housing, including exempting flat-led development from the requirement to provide affordable housing on the grounds of viability;
- Changes to Policies CS8 and DM23 to ensure for they are effective and consistent with national policy in guiding housing mix and densities;
- Alterations to ensure that the provision for employment and business needs in Policy CS13 is justified and that the protection of employment land is consistent with national policy and changes to the Use Classes Order (UCO);
- Modifications to Policies DM27, DM30 and DM32 to ensure they are consistent with national policy in supporting the retail function of existing centres; supporting a diversity of uses to maintain the vitality and viability of the high street; and applying the sequential and impact tests to proposals for retail development outside of existing centres;
- Changes to the structure of the SAP and the site allocations policies, so they are effective and consistent with national policy in making the site-specific requirements for development clear and unambiguous;
- The introduction of a series of New Policies to consolidate allocations for mixed use developments into single policies for each site and ensure clear and unambiguous criteria to guide decision making;
- Restructuring of the policies and proposals for the IP-One area in the IP-One Area Action Plan (AAP), including bringing them together into a single chapter for the AAP, to ensure the Plan is effective in guiding development and regeneration of the area;
- A number of modifications are required to ensure that the allocations for open space, leisure uses, community facilities and transport infrastructure are justified and effective;
- Modifications to the development management policies within the CSP to ensure they are clear, unambiguous, effective and consistent with national policy in guiding decision-making on planning applications;
- Additional and amended targets and indicators within the strategy for implementation, monitoring and review of the Plan, to ensure it is appropriate and robust; and
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This Report contains our assessment of the Ipswich Borough Council Local Plan Review 2018-2036 (the Plan) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (DtC). It then considers whether the Plan is compliant with the legal requirements and whether or not it is sound. Paragraph 35 of the National Planning Policy Framework 2021 (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The NPPF was updated in July 2021, which included changes to its policies on sustainable development, the tests of soundness for local plans, design, flood risk and biodiversity. These changes to national policy applied with immediate effect for the purposes of examining the Plan and, accordingly, we have taken them into account in preparing this Report. Unless stated otherwise, references in this Report are to the 2021 revised version of the NPPF.
3. The starting point for the Examination is the assumption that the local planning authority (LPA) has submitted what it considers to be a sound and legally compliant plan. The Plan comprises two parts – the Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document (DPD) Review – Final Draft (the CSP) and the Ipswich Borough Council Local Plan Site Allocations and Policies (Incorporating IP-One Area Action Plan (AAP)) DPD Review – Final Draft (the SAP). These two DPDs, submitted in June 2020, are the basis for our Examination. They are the same documents as were published for consultation in January-March 2020.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any Main Modifications (MMs) necessary to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. Our Report explains why the recommended MMs are necessary. The MMs are referenced in bold in the Report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
5. Following the Examination Hearing sessions, the Council prepared schedules of proposed MMs to the CSP and SAP and, where necessary, carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of them. The MMs schedules were subject to public consultation for eight weeks. We have taken account of the

consultation responses in coming to our conclusions in this Report. We have made some amendments to the detailed wording of the MMs and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the MMs as published for consultation or undermines the participatory processes nor the SA and HRA that have been undertaken. Where necessary we have highlighted these amendments in the Report.

Policies Map

6. The Council must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for Examination, the Council is required to provide a submission Policies Map showing the changes to the adopted Policies Map that would result from the proposals in the submitted local plan. In this case, the submission Policies Map comprises the set of plans identified as Ipswich Local Plan Review (ILPR) Policies Map, Final Draft, January 2020 and ILPR Policies Map IP-One Area Inset, Final Draft, January 2020¹.
7. The Policies Map is not defined in statute as a development plan document and so we do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map. In addition, there are some instances where the geographic illustration of policies on the submission Policies Map is not justified and changes to the Policies Map are needed to ensure that the relevant policies are effective.
8. These further changes to the Policies Map were published for consultation alongside the MMs in the Schedule of Proposed Changes to the Final Draft ILPR – Policies Map and IP-One Area Inset Map, July 2021. In this Report we identify any amendments that are needed to those further changes in the light of the consultation responses.
9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted Policies Map to include all the changes proposed in the ILPR Policies Map, Final Draft, January 2020 and ILPR Policies Map IP-One Area Inset, Final Draft, January 2020 and the further changes published alongside the MMs, incorporating any necessary amendments identified in this Report.

¹ Core Documents A3 and A3.1

Context of the Plan

10. The Plan is a full review of the 2017 Ipswich Local Plan Review (the 2017 Plan), which it is proposed to replace entirely. On adoption, it will form the development plan for the Borough of Ipswich, together with the Suffolk County Council Waste and Minerals Local Plan.
11. The Plan area encompasses the Borough and urban area of Ipswich, which is the county town of Suffolk and a regional centre of population, services and employment for East Anglia. The Borough forms part of the Ipswich Strategic Planning Area (ISPA), along with the adjoining Districts of Babergh and Mid Suffolk, and the former Suffolk Coastal part of East Suffolk District. Ipswich performs a key role in the economic growth and development of this area.
12. The history, location and geography of Ipswich presents both opportunities and constraints for its future planning and development. It is an historic port town, located on the Rivers Orwell and Gipping, approximately 19 kilometres (km) from the North Sea. As such, the town has been subject to both tidal and fluvial flooding in the past, with areas of the town centre remaining at flood risk. But recent improvements have been made to its flood defences, including a tidal surge barrier on the Orwell, creating opportunities for development along its waterfront.
13. Much of the town centre is also subject to Conservation Area designations, including its historic Wet Dock. Nevertheless, the Waterfront, focused around Wet Dock and the Orwell, is undergoing regeneration with the development of a marina, new apartments, hotels, cultural and commercial buildings, including a new campus for the University of Suffolk and the regional home for Dance East.
14. The port at the head of the Orwell remains active, as the UK's leading port for grain export, alongside other agricultural products and minerals, making an important contribution to the local and regional economy. However, the Orwell Estuary downstream of the port is designated a Special Protection Area (SPA), Ramsar Site and Site of Special Scientific Interest (SSSI) for protected bird species and other marine and riparian habitats. These, and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), lie partly within Ipswich Borough and act to constrain growth in the south-eastern part of the town.
15. A new Garden Suburb, allocated in the 2017 Plan, is being planned to provide 3,500 dwellings on 195 hectares (ha) of greenfield land, around Westerfield station on the northern periphery of the town. However, the Borough boundary is otherwise tightly drawn around the urban area, with few other opportunities for further major expansion within the administrative area.

Public Sector Equality Duty

16. Throughout the Examination, we have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. This, amongst other matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.
17. The Plan contains specific policies to provide for accommodation for Gypsies and Travellers, accessible environments for people with disabilities, and accessible and adaptable dwellings for older people, which should directly benefit people with these protected characteristics. MMs are recommended to Policy CS11 below, to ensure the accommodation needs of Gypsies and Travellers will be met within the Plan period.
18. Subject to the recommended MMs, there is no compelling evidence that the Plan as a whole would bear disproportionately or negatively on people who share protected characteristics. Indeed, the Council submitted an Equalities Impact Assessment and an Addendum to it², which demonstrate that the policies of the Plan would not have a negative impact on people with protected characteristics.

Assessment of Duty to Co-operate (DtC)

19. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by Section 33A in respect of the Plan's preparation.
20. There has clearly been close co-operation over an extended period between the Council and its neighbouring authorities, along with Suffolk County Council, on a number of strategic matters. This is confirmed by the Council's Statement of Compliance with the DtC³. It states that the Borough is part of the ISPA, which brings together the adjoining LPAs of East Suffolk District Council (including the former Suffolk Coastal District), Mid Suffolk District Council and Babergh District Council, along with Suffolk County Council (SCC). It operates through the ISPA Board, with a Councillor from each LPA and SCC. A Memorandum of Understanding (MoU) (March 2016) commits members to joint action on Objectively Assessed Housing Need (OAHN), Objectively Assessed Employment Need (OAEN), broad locations for growth, mitigation of impacts identified by the HRA, and infrastructure delivery for growth. The ISPA is a Housing Market Area (HMA) and a Functional Economic Area (FEA) centred around Ipswich.

² Core Documents A12 and Core Document L17

³ Core Document A13

21. The strategic matters have been identified as housing growth and distribution, Gypsy and Traveller accommodation, employment needs, transport infrastructure and connectivity, flood risk and water infrastructure, protection of heritage assets, and protection and enhancement of the natural environment. Table 1 in the Council's Statement of Compliance with the DtC⁴ sets out how each of these strategic matters has been addressed through the DtC and a Statement of Common Ground (SoCG)⁵ with the other Councils within the ISPA. It provides the background, evidence and process for reaching outcomes and agreements on each strategic matter, along with the arrangements for any necessary ongoing co-operation.
22. The Council is a member of the New Anglia Local Enterprise Partnership (LEP), which covers Norfolk and Suffolk. The Growth Programme Board for Suffolk seeks to secure investment to deliver infrastructure, homes and business growth. The Council has also been engaged with other prescribed bodies on cross-boundary matters and issues throughout the preparation of the Plan and prepared a SoCG with each of the main prescribed bodies, in accordance with paragraph 27 of the NPPF.
23. The approach to the delivery of the housing requirement is a strategic matter, which is agreed in the SoCG with the ISPA Councils and confirms that each LPA will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. That is the case here. The SoCG goes on to say that throughout the Plan-making process, where comprehensive deliverability assessments demonstrate that the housing need cannot be met within a local authority's boundary, the ISPA Board will provide the forum to collectively consider how the unmet need should be met. Whether any of Ipswich's housing needs should be met through greenfield releases within adjoining Districts, but adjacent to the Borough boundary, is therefore likely to be an option to be considered if there is evidence of unmet need within the Borough in the future. However, given that the Plan seeks to meet the needs of Ipswich within the Borough boundary within the Plan period, this approach is not currently necessary. The issue of whether or not the Council has allocated sufficient land to meet its housing needs is a soundness issue, which is considered later in the Report.
24. The provision of sites to meet the accommodation needs of Gypsies and Travellers for permanent pitches is also a soundness issue, given that the ISPA authorities have each agreed to meet their own needs in this respect, and is considered later in this Report.

⁴ Core Document A13

⁵ Core Document A21

25. The lack of a joint Plan with East Suffolk does not provide evidence of a failure of the DtC, as joint plans are not a prescribed approach to co-operation on strategic, cross-boundary matters. From the evidence before us, it is apparent that, where necessary, the Council has engaged constructively, actively and on an on-going basis with neighbouring authorities, SCC and the various bodies prescribed in the Regulations, in the preparation of the Plan.
26. Overall, therefore, we are satisfied that the DtC has been met, and the relevant policy requirements in the NPPF⁶ complied with.

Assessment of Other Aspects of Legal Compliance

Local Development Scheme

27. Section 19(1) of the 2004 Act requires development plan documents to be prepared in accordance with the Local Development Scheme (LDS). The scope and content of the Plan is consistent with the Ipswich LDS published in February 2019⁷. The timetable for the later stages of the plan preparation process as set out in the LDS, including the publication and submission of the Plan, were affected by the general election in December 2019 and the start of the Coronavirus pandemic in March 2020. However, the Council remedied this by submitting a revised LDS to reflect the amended timetable for the publication, submission and Examination of the Plan⁸. Therefore, the Council has satisfied the legal requirement to prepare the Plan in accordance with the LDS.
28. The LDS makes it clear that there are currently no proposals by communities for the preparation of Neighbourhood Plans in Ipswich. In order for the Plan to be effective a change is required to paragraph 2.5 to make this clear and unambiguous **[MM2]**.

Consultation

29. Development plans must be prepared in accordance with the statutory requirements for consultation, which are set out in the 2004 Act and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the 2012 Regulations).
30. The Council's Regulation 22 Consultation Statement for the Plan⁹ provides a comprehensive record of the consultation undertaken at the various stages of plan making. It shows the Council has engaged with bodies and persons specified in Regulation 18(2). Section 4 and

⁶ Paragraphs 24 to 27 in particular

⁷ Core Document A15

⁸ Core Document I40

⁹ Core Document A11

Appendices A and B of the Statement provide a summary of how the representations made at the Issues and Options and Preferred Options (Regulation 18) stages on the Plan process were taken into account in preparing the Plan. Whilst we recognise that the Plan as submitted may not satisfy the objections of some interested parties raised in representations at the Regulation 18 stages, it is clear from the evidence provided that the Council took those representations into account, in accordance with Regulation 18(3).

31. The Council's SCI, dated March 2018, explains how it will consult on planning policy documents¹⁰. The evidence in the Consultation Statement demonstrates that the Council complied with this in preparing the Plan. Concerns were raised at the Hearing that site notices displayed during consultation on the Plan, for proposed allocations at Ravenswood (IP 150a-e) and Humber Doucy Lane (HDL) (ISPA4), were either misleading or erected in the wrong place. However, the Council's evidence confirms that site notices were displayed in the vicinity of these sites. Whilst notices showing all of the Ravenswood allocations together may have been helpful in showing the extent of the proposals, the erection of individual site notices complied with the SCI by identifying proposals relating to specific areas of land. We deal with the comprehensiveness of the proposals for Ravenswood as part of the assessment of soundness below.
32. With regard to the site notices for HDL, the Council has confirmed that multiple site notices were displayed around the perimeter of the site for the duration of the Preferred Options consultation. In addition, a range of other methods of consultation were used to publicise the proposals of the Plan to local communities, including local newspapers and social media. The level of public involvement and engagement in the various stages of the Plan process, indicates that the consultation methods employed by the Council were effective.
33. The legal requirement in Regulation 35, to make hard copies of consultation documents available for public inspection at LPA offices and other buildings, was suspended during the pandemic by legislation which came into effect in August 2020¹¹. Accordingly, the Council submitted an addendum to the SCI¹² in November 2020 to reflect this. Nevertheless, the Council took additional steps at the submission stage to ensure that people without access to the internet or otherwise unable to view documents on-line could continue to be engaged in the Examination

¹⁰ Core Document A14, pages 4-5

¹¹ The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020

¹² Core Document I41

process. The Notice of Submission provided for people to make an appointment to view documents at the Council's offices, or if unable to visit the offices or view the documents on-line, to request copies of documents in accordance with Regulation 36. Hard copies of documents were placed in the library and customer services centre when they reopened at the end of July 2020.

34. Overall, therefore, we conclude that the consultation on the Plan was carried out in accordance with the Council's adopted SCI and met the consultation requirements of the Regulations.

Sustainability Appraisal (SA)

35. The 2004 Act and 2012 Regulations¹³ require LPAs to carry out an appraisal of the sustainability of a local plan, prepare a report of its findings, consult on it alongside the publication plan and submit this with the Plan for Examination. The Council submitted a report on the SA of the Plan¹⁴, from which it is evident these legal requirements have been met.
36. Paragraph 32 of the NPPF requires that plans should be informed throughout their preparation by an SA that meets the relevant legal requirements, including the Strategic Environmental Assessment (SEA) Regulations.¹⁵
37. The SA report submitted with the Plan is comprehensive and details the SA work undertaken on the preparation of the Plan. It was carried out by independent consultants on behalf of the Council, providing an objective assessment of the effects of the Plan and its alternatives. The SA was started in 2017, with a Scoping Report published for consultation alongside the Issues and Options document. An interim SA report was prepared and consulted on alongside the Preferred Options document in January 2019, and the final SA report with the Publication version of the Plan. The SA was also updated to assess the MMs.
38. The SA report contains appropriate baseline information and identifies the key sustainability issues for the Borough from which objectives were evolved. It uses a framework of nineteen SA objectives, which cover the topics set out in the SEA Regulations and have been subject to consultation with the relevant statutory bodies. These objectives have been used at each stage of the Plan preparation process to assess the likely effects of alternative growth scenarios and spatial options, and the policies and site allocations in the CSP and the SAP, both

¹³ Sections 19(5) and 20(3) of the 2004 Act and Regulations 17, 19 & 22 of 2012 Regulations

¹⁴ Core Document A4

¹⁵ The Environmental Assessment of Plans and Programmes Regulations 2004

individually and in terms of their cumulative effects. Where adverse effects are identified, recommendations for measures to avoid or mitigate these effects were made, which the Council considered in a response to the SA¹⁶. The report also includes a monitoring framework for incorporation into the Council's Authority Monitoring Report (AMR).

39. Eight strategic growth options were appraised for different levels of housing and jobs, ranging from figures based on the standard method Local Housing Need (LHN) to high growth policy and infrastructure-led options. The SA report explains the basis for the Council's preferred strategy of housing growth in line with LHN and ambitious but deliverable jobs growth, and the reasons for not selecting higher growth options. The effects of an increased LHN figure of 8,280 dwellings resulting from new affordability ratios, which were published by the Government in March 2020 after consultation on the Publication Plan had started, were assessed through an Addendum to the SA¹⁷ prepared alongside the submission version of the Plan.
40. Six strategic spatial options were appraised in the SA, including higher-density urban regeneration (Option 1), increased development beyond the boundary (Option 2) and changing the use of existing land in the Borough to housing (Option 3), as well as other options for meeting higher levels of growth within East Suffolk. Ultimately, the preferred spatial strategy of the Plan, set out in Policy CS2, is a hybrid of Options 1 and 3, with more than 50% of new homes proposed in the Plan on agricultural or greenfield land within two sustainable urban extensions at Ipswich Garden Suburb (IGS) and HDL, and the remainder to be delivered largely through brownfield site regeneration.
41. The preferred spatial strategy was not appraised as one of the spatial options, but Policy CS2, which sets out the spatial strategy of the Plan, was subject to SA, both at the preferred options and publication stages. Therefore, we are satisfied that the SA process, including the appraisals of the six spatial options, informed and influenced the spatial strategy chosen and set out in Policy CS2. Nevertheless, for completeness and in response to our initial question on this point¹⁸, the Council provided an appraisal of the preferred spatial strategy via a further Addendum to the SA¹⁹, which was submitted in October 2020. This gives a direct comparison of the likely effects of the preferred spatial strategy against the alternative spatial options, and a clear explanation of the reasons for its selection.

¹⁶ Core Document A4.1

¹⁷ Core Document A5

¹⁸ Question 7 of Core Document I10

¹⁹ Core Document I28

42. The Addendum was prepared by the same independent consultants, providing an objective SA of the effects of the preferred spatial strategy. It was available to all interested parties to comment on in advance of the Hearing, and was subject to discussion at the Hearing, which met the requirements of the SEA Regulations for consultation. Although the Addendum was published after the submission of the Plan, SA is an iterative process, which carries on throughout the Plan preparation and Examination process. From the evidence above, it is clear the Addendum to the SA was not undertaken as an exercise to justify a pre-determined strategy. Rather it built on, and was consistent with, the approach and findings of the SA work undertaken throughout the Plan preparation process.
43. It was argued in representations that the SA failed to adequately consider certain issues, such as air quality and traffic impacts, and to recommend specific mitigations, such as a 15% modal shift and the potential for land allocated for retail and car parking to be used for more town centre homes. However, both air quality and transport are identified as key issues for the SA in the initial Scoping report. Objectives to improve air quality and promote sustainable modes of transport were part of the SA Framework against which all options were appraised. Air quality and transport modelling²⁰ informed the final publication draft of the Plan, including the preferred spatial strategy. The SA was also updated in the June 2020 Addendum, undertaken prior to submission, to take account of the Air Quality Assessment (AQA) of the aligned ISPA local plans²¹, which assessed their cumulative effects on air quality in the light of the impacts of those plans on traffic movements in the area.
44. The SA is one part of the evidence base informing the preparation of the Plan. Mitigation measures, such as the need for a 15% modal shift to support the spatial strategy, emerged from work undertaken on the modelling of traffic movements arising from the preferred spatial strategy. As such, we are satisfied that the SA was robust and legally compliant in respect of its consideration of the air quality and transport effects of the Plan.
45. With regard to the suggestions of inaccuracy and a lack of consistency in the scoring of some options, policies and site allocations in the SA, it is important to recognise that the appraisal process is not a precise science. Rather it is a judgement based process, which encompasses differences of professional opinion. Such differences do not mean that the appraisal is flawed. At each stage the SA has applied the same

²⁰ Core Documents D33, D34 and D35

²¹ Core Document D33

methodology to the appraisal of the Plan. There is no compelling reason to find that the SA does not provide a comparative and equal assessment of the policies and alternatives.

46. The SA was updated to take into account the changes to the Plan introduced by the MMs. The results of the assessment are clearly and comprehensively set out in an SA Addendum²², which was published for consultation alongside the MMs. Further appraisal work was carried out, where the MMs were considered to potentially alter the SA effects of the Plan. This included the further appraisal of a number of the new site allocation policies in the MMs, which bring together related sites, such as at Ravenswood. The Addendum also revisited the SA assessment of the likely cumulative effects of all proposals in the Plan in combination, taking account of the MMs, and together with the effects of transboundary proposals in adjoining districts.
47. On this basis, we find that a robust and proportionate SA of the Plan has been carried out, which has assessed the likely environmental, social and economic effects of the Plan and incorporates the requirements for SEA. It is evident that the SA has influenced the spatial strategy, policies and mitigation measures proposed. Accordingly, we conclude that the SA work undertaken on the Plan is adequate.

Habitats Regulations Assessment (HRA)

48. An HRA of the submitted Plan was undertaken²³, including an Appropriate Assessment (AA), in line with the Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations). The need for an AA was due in particular to the proximity of proposed development sites to the Stour and Orwell Estuary SPA and Ramsar Site, and the Suffolk Coast and Heaths AONB, parts of which lay within the Borough boundary. The HRA concludes that, subject to the inclusion of recommendations for amended policy wording and site mitigations, the Plan will not lead to likely significant effects on any national network site (formerly European site). Natural England, as the statutory consultee, agrees with this conclusion.
49. The recommendations of the HRA have been incorporated into the Plan, including an ISPA-wide Recreational Avoidance Mitigation Strategy (RAMS) set out in Policy ISPA3. Whilst representations argue that the HRA did not consider the combined effects of the site allocations at Ravenswood, it is clear from the HRA report that the assessment has

²² Core Documents L10, L11 and L12

²³ Core Document A6

considered the in-combination effects of the Plan as a whole, as well as individual site allocations.

50. An HRA was undertaken of the MMs, by the same independent consultants who prepared the submission HRA, the results of which were set out in two HRA Addendums²⁴ published for consultation alongside the MMs. These reviewed the findings of the previous HRA in the light of the MMs and concluded that none alters the conclusions of the original HRA of the final draft plan. Natural England were consulted on the HRA update and confirmed their agreement with its conclusions, that adverse effects on integrity, alone or in-combination are ruled out for all European sites as a result of the Plan with MMs.
51. Accordingly, we find that the Plan is legally compliant with respect to the Habitats Regulations.

Other Legal Requirements

52. Sections 19(1B) and 19(1C) of the 2004 Act require development plans, taken as a whole, to include policies to address the strategic priorities for the development and use of land in the plan area. Part B of the CSP identifies 12 strategic objectives to address the key issues and challenges for Ipswich over the Plan period and to guide the Plan. Chapter 8 sets out the spatial strategy and strategic policies to meet those objectives, which include Policies ISPA 1-4, CS 1-8 and CS10-20. Taken as a whole, these and the supporting site allocations policies of the SAP, meet the statutory requirement above.
53. Section 19(1A) of the 2004 Act requires that development plan documents must, taken as a whole, include policies designed to ensure that the development and use of land in the LPA's area contribute to the mitigation of, and adaptation to, climate change. The Plan includes a range of policies that will help to ensure this, including: Policy CS1 which places tackling climate change at the heart of the Plan's policies for sustainable development; Policies CS4, CS16 and DM8-10, which seek to protect and enhance the natural environment, trees and green infrastructure; Policies CS2 and DM23 which help to maximise the density of development in accessible locations; Policies CS5, CS17, CS20 and DM21, which encourage the location and design of development to minimise the need to travel and seek improvements to sustainable transport modes; Policies DM1 and DM2, which require sustainable construction in new development, including reduced CO₂ emissions, increased water efficiency and greater use of renewable or low carbon sources of energy; and Policy DM4, which aims to prevent development

²⁴ Core Documents L13 and L14

that would increase the risks of flooding. We address the soundness of these policies below, but, taken as a whole, we confirm that the Plan meets the statutory requirement of section 19(1A).

54. Paragraph 1.14 in the opening chapter of the CSP confirms that when the Plan is adopted, it will replace the 2017 Ipswich Local Plan Review as planning policy for Ipswich. For consistency, **MM162** and **MM164** are required to make this clear in the introduction of the SAP. Although there is not a separate list of the superseded policies from the 2017 Plan, it is clear from these statements that all of the policies of the 2017 Plan will be superseded. Accordingly, this meets the requirements of Regulation 8(5). In order to be effective, the list of policies contained in the SAP, which is set out in Appendix 2 of the document, should be deleted **[MM311]**.
55. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

56. Taking account of all the representations, the written evidence and the discussions that took place at the Examination Hearing, we have identified nine main issues upon which the soundness of this Plan depends. The remainder of this Report deals with these main issues. It does not respond to every point or issue raised by Representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.
57. Paragraph 35 of the NPPF sets out the tests of soundness. Appendix 1 to the SAP summarises the soundness tests, however, paragraph 35 of the NPPF updated in the 2021 revision. To ensure that the Plan remains consistent with national policy in this regard, **MM310** is required to delete this appendix in full.
58. In a number of places, as explained in the report below, the Plan needs to be amended for consistency with the 2021 revised version of the NPPF. Prior to adoption, the Council should ensure that all references to the NPPF in the Plan are updated to reflect the 2021 version. For clarity and consistency with national policy, the definition of the PPG in the glossary of the CSP also needs to be updated **[MM155]**.

Issue 1 – Is the spatial strategy of the Plan positively prepared, justified as an appropriate strategy, and effective in terms of cross-boundary strategic priorities, and will it enable the delivery of sustainable development in accordance with national policy?

Strategic and Non-Strategic Policies

59. The spatial strategy for the Borough is contained within a series of policies in chapter 8 of the CSP. We deal with the soundness of the spatial strategy as set out in these policies below.
60. Paragraph 21 of the NPPF requires plans to make explicit which policies are strategic policies, and, under Footnote 14, to distinguish them from non-strategic policies in single local plans. Whilst it is clear that the spatial strategy policies in the CSP are strategic, the status of the development management policies in the CSP and those in the SAP, as non-strategic policies, is not explicit. Therefore, for clarity and to ensure consistency with national policy, **MM1** to the CSP and **MM163** to the SAP are necessary.
61. Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption. Upon adoption, the strategic policies within this Plan will look forward around 14 years, to the end of the Plan period in 2036. Although this would not accord with the wording of paragraph 22 of the NPPF, any delay in the adoption of this Plan by the Council, following any additional work required to extend the Plan period, would prevent those sites allocated in the Plan from coming forward in a timely manner, which would be contrary to the Government's objective to significantly boost the supply of housing. On balance, therefore, in this case, a 14-year period from adoption would remain broadly consistent with aims of paragraph 22 of the NPPF, in allowing adequate time for the Plan's strategic policies to take effect.

Overall Spatial Distribution of Development

62. The spatial strategy promoted in the submitted Plan is to deliver sustainable growth and regeneration in Ipswich by pursuing a strategy of urban renaissance in central Ipswich, to address social and economic deprivation and improve poor quality physical environment and social infrastructure, while delivering a significant number of new homes, including affordable housing, through sustainable urban extensions.
63. Policy CS1 sets out the approach to sustainable development in Ipswich, including tackling climate change. In order to be effective, however, this policy should refer to the requirements for sustainable

development set out in other Plan policies, which should also be addressed by development proposals **[MM23]**.

64. Policy CS2 sets out the location and nature of development to achieve the regeneration and sustainable growth of Ipswich. It includes focusing new development in the Town Centre, the Waterfront and Portman Quarter with a mix of urban regeneration sites, and sustainable urban extensions at IGS and the northern end of HDL. We consider that this is an appropriate strategy for Ipswich when considered against the alternatives set out in the SA, which, together with the SA Addendum, provides a reasoned justification for the preferred strategy.
65. In order to be effective and consistent with national policy, however, Policy CS2 requires amendment to reflect the changes to the Use Classes Order (UCO) in respect of the removal of Class B1; to ensure that proposals for development are in accordance with Policies DM11 and DM23, in respect of countryside and density respectively; to ensure that heritage assets are dealt with appropriately; and to remove reference to the previous name of the Portman Quarter **[MM26]**. For clarity and effectiveness, **MM6** is also necessary to amend the supporting text to the Key Diagram to identify the IP-One area and Central Shopping Area as key development locations within the overall strategy.
66. The supporting text to Policy CS2 also requires changing to more accurately reflect the likely phasing between IGS and HDL (in paragraph 8.55) in order to be effective **[MM27]**. It is also necessary for soundness to make clear that the strategy proposes to meet the housing requirement for Ipswich within the Borough boundary, during the Plan period, and delete reference to any need for future development opportunities beyond the boundary later in the Plan **[MM28]**.

Flood Risk

67. Paragraph 161 of the NPPF requires plans to apply a sequential, risk-based approach to the location of development, so as to avoid, where possible, flood risk to people and property. The Plan has been informed by a Strategic Flood Risk Assessment (SFRA), which has been updated to reflect the latest climate change allowances, and to assess fluvial flood risk against the results of the new River Gipping model²⁵. It shows that whilst the new tidal barrier and flood defences along the River Orwell will protect most land within the central area of Ipswich from tidal flooding, there is residual tidal flood risk from overtopping of defences. It also reveals that fluvial flooding from the River Gipping is still a risk to land within the Portman Quarter.

²⁵ Core Document I34 and appendices

68. In preparing the Plan, the Council has applied the sequential test to steer development towards the areas of lowest flood risk. Land has been allocated in the Plan for approximately 4,990 dwellings on sites in Flood Zone 1²⁶, including IGS and the northern end of HDL. However, there is not enough land in areas at the lowest risk of flooding in Ipswich to meet the housing requirement²⁷. In addition, the spatial strategy of the Plan is urban regeneration-led, with many brownfield development opportunities located in the centre of Ipswich, in areas at greater risk of flooding.
69. Accordingly, the SFRA has considered the suitability of land within Flood Zones 2 and 3 for residential development. Sequential and exception tests have been carried out to inform site selection to ensure that sites are NPPF-compliant²⁸. Sites with a total capacity for around 1,675 dwellings have been allocated on land within Flood Zones 2 and 3, at varying risks of fluvial and residual tidal flooding²⁹. None of the allocations are within Zone 3b where development is not permitted. In all cases, the sites would offer wider sustainability benefits, including regeneration, recycling of brownfield land and accessibility by sustainable modes of travel, which could be judged to satisfy the first part of the exception test³⁰. With regard to the second part of the exception test, the SFRA has identified appropriate mitigation measures, which would be necessary for residential development on these sites to be considered safe³¹. The Environment Agency (EA) has confirmed, in its final SoCG with the Council³², that the SFRA, as updated, provides a reliable evidence base for the Plan. As a result the EA no longer raises any objections to the soundness of the Plan in respect of flood risk.
70. Overall, therefore, we are satisfied that the Plan has been informed by a robust and appropriate SFRA, based on the most up to date flood risk data and climate change allowances, taking account of the advice of the EA. The spatial strategy and the selection of sites are consistent with national policy in respect of the sequential and exception tests. Notwithstanding the actual and residual flood risks to site allocations within the central area of Ipswich, they are justified as appropriate in terms of flood risk, taking into account the reasonable alternatives, and the regeneration and sustainability benefits they provide.
71. Policy DM4 sets criteria for the determination of planning applications, to ensure that development proposals are only permitted where they do not

²⁶ Tables 2-2 to 2-4 of Core Document D29.32

²⁷ Core Document I34, page 61, paragraph 8.1.

²⁸ Chapter 2 of Core Document D29.32 and chapter 8 of Core Document I34

²⁹ Tables 2-5 to 2-7 of Core Document D29.32

³⁰ In paragraph 164a) of the NPPF

³¹ Chapter 8 and Table 8-1 of Core Document I34

³² Core Document I42

increase the risk of flooding elsewhere and are designed to remain safe for people for the lifetime of the development. However, MMs are required to ensure that the policy is consistent with national policy, in requiring submission of site specific flood risk assessments (FRA) and compliance with both the sequential and exception tests. For clarity and effectiveness, the use of the words 'where practicable' should also be deleted from the policy requirements. Reference should also be made to the Council's Supplementary Planning Document (SPD) on Development and Flood Risk, which provides relevant detailed guidance for applications **[MM78, MM79, MM80 and MM81]**.

72. Main modifications are also required to the supporting text on flood risk at various places in the Plan, to ensure it is justified by reference to appropriate mitigation measures and the most up to date SFRA. This includes a commitment to keeping the SFRA up to date as a living document **[MM4, MM5, MM24, MM25 and MM82]**.
73. The Policies Map should contain the geographic representation of the Plan's policies. Whilst Plan 2 in the CSP is helpful in showing the general extent of Zones 2 and 3 within the Borough, it does not enable a landowner or decision maker to determine whether a parcel of land lies within a higher risk Flood Zone and, therefore, whether the sequential and exception tests need to be applied to it. Accordingly, to ensure the Plan is clear and unambiguous, Flood Zones 2 and 3 should be added to the Policies Map. For clarity, an amendment is also required to Plan 2 to include reference to fluvial flood risk **[MM160]**.

Transport Capacity

74. Paragraph 104 of the NPPF expects transport issues to be considered from the earliest stages of plan making, so that the impacts of development on transport networks can be addressed, opportunities to change transport usage (for example through modal shift) and promote sustainable transport modes can be realised, and the environmental impacts of traffic assessed and its adverse effects mitigated. Paragraph 105 of the NPPF expects the planning system to manage patterns of growth to support these objectives, and that significant development is focused on locations which are or can be made sustainable.
75. In seeking to accommodate Ipswich's own development needs within the Borough boundaries and through a combination of urban regeneration and sustainable urban extensions, we consider that the Plan's spatial strategy is consistent with these national policy objectives. The effect of traffic growth from this planned development on the transport network in and around Ipswich has been assessed as part of the ISPA Local Plan

Modelling Report³³. The forecast results show that, for the local network in Ipswich, even with a downward adjustment to the number of trips to account for future modal shift of 7-9%, some junctions and sections of highway in Ipswich would be at or above their current capacity at 2026 and by the end of the Plan period in 2036.

76. The ISPA Transport Mitigation Strategy (TMS)³⁴ proposes a range of interventions including junction improvements and sustainable transport measures. These include Smarter Choices for travel, Quality Bus Partnerships to improve the frequency and financial viability of bus services, demand management by reviewing parking provision and charging, additional Park and Ride facilities for which the Plan makes allocations, and improvements to road infrastructure to support bus prioritisation, walking and cycling. From the evidence before us, all of these measures are feasible and deliverable through a combination of public funding and Section 106 developer contributions.
77. SCC confirmed in oral evidence at the Hearing, that its approach, as Highway Authority, is to monitor traffic growth and manage the highway network, with incremental mitigation measures to improve capacity and encourage modal shift over time. A target of a 15% modal shift for travel, away from private cars to public transport, walking and cycling, by the end of the Plan period has been identified as necessary, in order to support a greater reduction in traffic than assumed in the modelling. Whilst unprecedented in Ipswich, modal shifts of up to 11% have been achieved through Smarter Choices initiatives elsewhere.
78. As submitted, a 15% modal shift target is not included in the Plan. Therefore, so that the Plan is justified and effective, a change is necessary to Policy CS5 to include a 15% target, and to require transport statements and assessments submitted with planning applications to demonstrate how they will support achievement of the target, using measures set out in the TMS **[MM33]**.
79. Associated MMs to Policies CS17 and DM21 to ensure development contributes to the interventions and measures in TMS, to support the modal shift target are discussed under Matter 8 below. Subject to these MMs, and based on the evidence before us, we are satisfied that the Plan provides an effective strategic policy framework to sustainably manage the impact of the planned development and growth on the transport network.

³³ Core Documents D35, D35.1, D35.2, D38 and D38.2

³⁴ Core Document D39

Air Quality

80. The impacts of the Plan's spatial strategy and proposals on air quality have been modelled by independent consultants, with the results set out in the Air Quality Modelling Report³⁵ (AQMR). It assessed the effects of the Plan strategy with and without transport mitigation, based on the measures set out in the SCC Transport Mitigation Strategy for the ISPA³⁶. The modelling compared 2017 baseline level concentrations of pollutants with forecast levels in 2026 and 2036, taking into account the growth proposed in the Plan by those dates.
81. The modelling illustrates that, with transport mitigation in place, most receptors would experience negligible impacts on annual mean nitrogen dioxide (NO₂) concentrations, comparing the baseline with levels in 2026 and 2036. Where impacts would be notable, in 2026 they are mainly beneficial impacts due to reductions in the concentration of pollutants. By 2036 there would be some adverse impacts, but these are limited to Air Quality Management Area (AQMA) No.2. The Halberd Inn in Crown Street, within AQMA No. 2, is the only location predicted to experience exceedances of the air quality standards.
82. The overall conclusion of the report is that future levels of air pollutants would generally be lower than present, with NO₂ levels predicted to be substantially lower. The report also confirms that there would be no significant impacts on SPA and SSSI sites in the Orwell Estuary. The greatest positive influence on air quality over the Plan period is likely to be from national measures to pursue cleaner vehicles. But the modelling indicates that the ISPA transport mitigation measures, as set out in Policy CS20, will also contribute to reduced air pollutant levels.
83. We consider the AQMR provides a robust and proportionate evidence base on which to reach conclusions about the effects of the Plan strategy on air quality in Ipswich. It demonstrates that the Plan contributes positively towards compliance with air pollution limit values, through pursuing a strategy which helps to deliver modelled air quality improvements.
84. In line with national policy³⁷, it is important that decisions on planning applications continue to contribute towards compliance with limit values, taking into account the cumulative impacts from individual sites. Policy DM3 of the CSP seeks to ensure that the impact of development on air quality is mitigated and that proposals do not negatively impact on existing air quality levels in the Borough. While we are satisfied that Policy DM3 is sound, a change is required to the supporting text for

³⁵ Core Documents D33, D33.1 and I9 (which updates D33.2)

³⁶ Core Document D39

³⁷ In paragraph 186 of the NPPF

effectiveness, to make it clear that the focus of the policy would contribute towards achieving compliance with air quality limit values for pollutants **[MM77]**.

85. Accordingly, on the basis of the evidence before us, we are satisfied that the spatial strategy and policies of the Plan are consistent with national policy, in terms of their overall impacts on air quality.

Environmental Capacity

86. Suffolk contains nationally and internationally protected landscapes and habitats, including the Suffolk Coast and Heaths AONB and SPAs, Special Areas of Conservation (SACs) and Ramsar Sites in the Orwell Estuary, which wrap around and overlap the south-eastern boundary of the Borough. It is important that the effects of development in Ipswich and the surrounding districts on these areas are appropriately mitigated.
87. One of the mechanisms for mitigation is the Recreational Disturbance Avoidance Mitigation Strategy (RAMS) jointly developed by the ISPA authorities. Policy ISPA3 defines the cross-boundary approach to be taken in requiring and implementing mitigation measures in line with the RAMS, with the detail set out in an SPD. For effectiveness, changes to the policy and its supporting text are necessary to correctly reference the RAMS and clarify how the SPD will be used in securing appropriate mitigation from nearby development **[MM15, MM16]**.
88. Policy CS4 provides an overarching policy framework for the conservation and enhancement of the Borough's built, heritage, natural and geological assets. Overall, the policy is positively prepared, justified and consistent with national policy, but changes are necessary to criterion g of the policy to ensure it is effective in protecting and enhancing an ecological network and securing net gains for biodiversity through development **[MM31]**. Changes to the supporting text are also required to clarify references to the relevant Marine Plans for the Orwell Estuary as material considerations in determining planning applications **[MM32]**.
89. Policy CS16 sets the strategic policy framework for the protection of green infrastructure and open spaces in the Borough and for the provision of new open space as part of development. It is positively prepared and justified, except for criterion a, which appears to require new development to remedy existing deficits of open space. Policy DM6 contains detailed standards for the provision of open space and recreation facilities in new developments, and provides appropriate guidance on how this can contribute to addressing existing deficits. Accordingly, to ensure the plan is effective and justified, **MM64** amends the wording of criterion a to cross refer to Policy DM6.

90. Subject to these MMs, we are satisfied that the spatial strategy and policies of the Plan are justified, effective and consistent with national policy, in terms of their overall impacts on the ecological and heritage assets of the Borough.

Infrastructure

91. The strategic infrastructure requirements to support the Plan's spatial strategy are set out in Policy ISPA2, with further details of the major infrastructure proposals described in Table 8A of the submitted Plan. However, there is no mention in Policy ISPA2 of appropriate provisions to meet the needs of the Police, community cohesion and community safety, or green infrastructure and Suitable Alternative Natural Greenspace (SANG). In order to be effective, changes are required to Policy ISPA2 to include these matters **[MM14]**.
92. Policy ISPA2 and its supporting text refer to the Council's support for work to investigate the feasibility of an Ipswich Northern Route. However, this proposal is not supported by all authorities in the ISPA, and the SoCG between the ISPA authorities³⁸ states that evidence produced to inform the emerging Local Plans does not identify the need for a northern route to support the growth proposed. Given this, in order for the Plan to be effective and justified, the reference to an Ipswich Northern Route should be removed from Policy ISPA2 and amendments made to the supporting text to reflect the current position **[MM14, MM13, MM73, MM74]**.
93. Policy CS17 of the submitted Plan sets out how infrastructure is expected to be delivered. However, in order to be effective, it should also set out how proposed developments can meet the requirements of Policy CS5 in relation to wider modal shift objectives **[MM66]**. Furthermore, reference should also be included to acute hospital facilities within the policy in order for it to be effective **[MM66]**. For clarity and effectiveness, the supporting text to Policy CS17 should include reference to the Department for Education's statement that it is able to forward fund schools in advance of the Section 106 Agreements being signed, to assist growth and delivery **[MM65]**. The reference to affordable housing in the supporting text to Policy CS17 should be removed, as this matter is covered by Policy CS12 and not Policy CS17, in order for the Plan to be effective **[MM67]**.
94. The provision of health services is set out within Policy CS19 of the submitted Plan, with new and improved healthcare and ancillary facilities proposed at Heath Road Hospital Campus. To ensure that the policy is effective, changes are required to ensure that the Council's support, and

³⁸ Core Document A21

the likely ancillary uses, are clearly set out, along with some minor typographical changes **[MM68]**. Corresponding changes are also necessary for effectiveness to the supporting text in relation to the range of healthcare and ancillary uses likely to be allowed **[MM69]**. Furthermore, for clarity and effectiveness, the supporting text should make it clear that it is the travel implications of hospital related developments, which must be fully considered **[MM70]**.

95. Policy CS20 sets out the key transport proposals in the submitted Plan. Although no changes are required to the policy, in order to ensure that the Plan is effective, we recommend a number of changes to the supporting text. Firstly, it should be made clear that detailed measures, costings and a mechanism for collecting financial contributions from the planned growth in the ISPA, will be determined through the ISPA Board and agreed by each respective local planning authority **[MM71]**. Secondly, clarification of the bridges required from the West bank to the Island Site and across the Wet Dock lock gates, along with the funding arrangements, is necessary **[MM72, MM73]**.
96. Table 8A of the submitted Plan sets out the major infrastructure proposals in more detail, including the cost and potential funding arrangements, as well as the anticipated timescale for completion. In order to reflect the up-to-date requirements of the Highway Authority and Local Education Authority, in respect of transport and education facilities respectively, a number of changes are necessary to this table, so it is effective in specifying the infrastructure required to support growth **[MM137]**. Further suggestions were made by Representors in respect of specific sewerage and water supply schemes to be included in the table. However, we do not consider that these are necessary for soundness as Table 8A refers to generic improvements to the network, which are the responsibility of Anglian Water Services Limited.
97. Overall, we are satisfied that, subject to the MMs set out above, the Plan adopts a comprehensive and evidenced-based approach to the provision of infrastructure to support the delivery of the spatial strategy.

Viability and Deliverability

98. The viability of the spatial strategy and the type of sites on which it relies for delivery have been tested. The Whole Plan Viability Assessment (WPVA)³⁹ submitted with the Plan, assesses the viability of a range of development typologies, reflecting the type, scale and location of development expected to come forward over the Plan period. It makes reasonable assumptions for the costs and values of development, including the additional costs of policies contained in the

³⁹ Core Document D42

Plan. All residential typologies are tested with a policy-compliant level of affordable housing, including 31% and 30% for IGS and HDL, respectively, as set out in Policies CS10 and ISPA4, and 15% for all other types based on the requirements of Policy CS12.

99. During the Hearing, an error was identified in the interest calculation of the appraisals for some residential typologies. However, the Council submitted a clarification note⁴⁰, which corrected the error and retested those appraisals.
100. Overall, the viability evidence shows that residential development with a predominance of housing (housing-led) would be viable, on greenfield land across the Borough, and on brownfield land in those parts of the Borough with higher property values, with varying surpluses to support Section 106 infrastructure costs. On the other hand, residential development with a predominance of flats (flat-led), and housing-led schemes on brownfield land in areas with lower property values, are shown to be unviable.
101. Further sensitivity testing was submitted by the Council following the Hearing⁴¹, which shows that by making reasonable, evidence-based adjustments to some of the appraisal inputs, housing-led development on brownfield land in lower value areas also becomes viable. But to address the viability issues for flat-led development, elsewhere in the Report we recommend MMs to Policy CS12 on Affordable Housing, to exempt flat-led development on brownfield sites from affordable housing contributions, given the dependence of allocations within the IP-One area on this form of development to deliver the housing required. IGS and HDL are both shown to be viable in the WPVA, at 31% and 30% affordable housing, respectively, subject to the scale of infrastructure required. We consider the policies for these two strategic sites separately below.
102. Commercial development types, other than convenience retail schemes, are shown to be unviable, albeit the inclusion of policy costs, such as RAMS contributions in Policy ISPA3, make very little difference to the viability outputs in the appraisals. However, the policies in the Plan seeking Section 106 contributions towards infrastructure (Policy CS17), and mitigation measures which are likely to increase development costs, such as Policies DM1 and DM2 for higher environmental standards and decentralised energy, include clauses which would allow contributions to be varied on viability grounds. Therefore, the viability of commercial development can be improved by reducing or waiving policy costs, if necessary. The Council also referred to the role of Homes England and the Housing Investment Funding in supporting the viability of brownfield regeneration opportunities.

⁴⁰ Core Document K2

⁴¹ Appendix 13 of Core Document K6

103. On the above basis, we find that the WPVA and the additional sensitivity testing undertaken by the Council, provide a robust and reliable evidence base on which to assess the viability of the spatial strategy and policies in the Plan. We recognise this is a high level assessment and that costs and values can vary, when informed by more site specific surveys and information. However, subject to the MMs to Policy CS12 referred to above and discussed elsewhere in our Report, we find that the policies in the Plan allow sufficient scope for the Council to exercise flexibility in determining applications, where the delivery of development may be at risk due to viability. As such, we are satisfied that the sites identified in the Plan can be viably delivered and, therefore, that the reliance of the strategy on brownfield regeneration sites is justified.
104. For clarity, **MM105** is necessary to ensure the supporting text to Policy DM23 on the Density of Residential Development, correctly references the WPVA results, in respect of the viability of higher density residential development.

Conclusion

105. Subject to the MMs identified above, we conclude that the Plan's overall spatial strategy is positively prepared, justified as an appropriate strategy, and effective in terms of cross-boundary strategic priorities, and that it will enable the delivery of sustainable development in accordance with national policy.

Issue 2 – Has the Plan been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for housing?

Housing Requirement

106. Ipswich is the County town for Suffolk and sits within a wider area, including the Districts of Mid Suffolk and Babergh and the former Suffolk Coastal District element of East Suffolk Council, which all border Ipswich. These surrounding Districts demonstrate strong functional relationships with Ipswich and, from the evidence before us, it is clear that these four authority areas form the Ipswich HMA. A change is required for effectiveness to the supporting text to Policy CS10 to clarify that it is East Suffolk, rather than Suffolk Coastal District Council, with whom the Council has been working **[MM44]**.
107. The housing requirement in the HMA is based on the standard method for calculating housing need, uplifted to reflect the affordability ratio. The submitted Plan therefore concludes that this equates to 35,334 dwellings across the HMA, with a total requirement for Ipswich of 8,010 dwellings.

This is based on the affordability ratio published by the Office for National Statistics in April 2019. To ensure that the Plan has been positively prepared it is necessary to update these figures to include the latest affordability ratio published in March 2020. This would reduce the overall minimum requirement for the HMA to 34,200 dwellings, but would lead to a slight increase in the requirement within Ipswich to 8,280 dwellings. Changes are therefore required to the supporting text, Table 8.1 and Policy CS7 in the CSP and to the supporting text in the SAP to reflect this, to ensure that the Plan is effective and consistent with national policy **[MM8, MM9, MM34, MM36, MM165]**.

108. As submitted, the supporting text to Policy CS7 states that the Borough has limited capacity for future development and is working with neighbouring authorities to identify housing need across the HMA. However, as identified earlier in this Report, the Council is seeking to meet its own needs in full within the Borough boundary, and there have been no requests from other LPAs for Ipswich to provide additional housing to address unmet need from elsewhere. Furthermore, there is no evidence that any unmet need from elsewhere should be accommodated within Ipswich. Therefore, an amendment is required to the supporting text to Policy CS7 to make this clear and for the Plan to be effective and positively prepared **[MM37]**. Corresponding changes are also required to Policies ISPA1 and CS7, along with Objective 2 and the supporting text to Policy CS10 in the CSP for effectiveness, to acknowledge that Ipswich will contribute towards the collective delivery of at least 34,200 dwellings across the ISPA 2018-2036 **[MM12]**, with a housing requirement of 8,280 dwellings, which equates to an annual average of at least 460 dwellings **[MM3, MM36, MM44]**.
109. Policy CS7 refers to the housing requirement being stepped, with 300 dwellings per annum (dpa) required between April 2018 and March 2024, rising to 518 dpa between April 2024 and March 2036, to reflect the period when delivery from the strategic site at IGS and the northern end of HDL is expected to take place. These sites will meet a significant proportion of the annual housing requirement. No other sites have been advanced within the boundaries of Ipswich that would help to significantly boost delivery of dwellings in the period up to 2024, to avoid a stepped requirement.
110. From the evidence before us, therefore, we are satisfied that a stepped requirement is appropriate, given the nature of the strategic housing allocations. However, given the necessary amendments to the housing trajectory set out elsewhere in this Report, along with the slight increase in the requirement figure for Ipswich, in order to be effective the number of dwellings required each year from April 2024 to March 2036 should be increased to 540 **[MM36]**.

111. Subject to these MMs, we are satisfied that the submitted Plan is positively prepared in meeting local housing needs in full, and that stepping the annual requirement to reflect the nature of the housing supply is justified as an appropriate strategy.

Gypsy and Traveller Accommodation

112. Ipswich currently has two sites providing permanent pitches for Gypsies and Travellers' accommodation. These are: a large site with 48 pitches at West Meadows next to junction 53 of the A14; and a small family site with 2 pitches at Henniker Road, within a settled community residential area in the north-west of Ipswich.
113. Working collaboratively with the other ISPA local authorities, the Council has assessed the need for Gypsy and Traveller accommodation in Ipswich over the Plan period. An Accommodation Needs Assessment (ANA) was undertaken in May 2017⁴², which was updated with evidence submitted before and after the Hearing⁴³. Together these provide a robust and up to date assessment of need and supply for the period 2016-2036. No specific needs have been identified for accommodation for Boat Dwellers or Travelling Showpeople in Ipswich. However, the ANA identifies a need for 3 short stay pitches across the ISPA, to provide transit accommodation for Gypsies and Travellers.
114. The evidence shows that, in terms of permanent pitches, the needs of Gypsies and Travellers for accommodation in Ipswich for the period 2016-2021 have been met at the West Meadows site. This has occurred through the creation of 6 new pitches on site and 12 existing pitches being vacated by families leaving the area, moving into bricks and mortar housing, or as a result of mortality. For the remainder of the plan period, there is a need in Ipswich for a further 3 permanent pitches between 2021 and 2026, and another 10 permanent pitches from 2026-2036.
115. Policy CS11 states that provision will be found, where possible, to meet the need either within the Borough or by working with neighbouring authorities. However, as submitted, the Plan does not allocate any sites to meet the identified need. Rather, the approach to meeting need, as explained in the Gypsy and Travellers' Topic Paper⁴⁴, is led through the development management process, for small windfall sites catering for around 3-4 families, which the evidence in the ANA from household surveys suggests are the preference of the Gypsy and Traveller

⁴² Core document D17

⁴³ Core documents I29 and K21

⁴⁴ Paragraph 3.11 of Core Document D54

community. The policy defines a set of criteria against which applications for the provision of permanent pitches will be considered.

116. The Council's evidence suggests that the Waveney Local Plan, adopted in 2019, sets a precedent for this approach. However, the Inspector's report for the Waveney Local Plan⁴⁵ explains that this was a pragmatic approach which had a realistic prospect of providing for the identified needs, due to the Council's track record of granting permission for pitches. There is no comparable evidence of a track record of such permissions in Ipswich; the two existing sites were granted permission some time ago. Based on the evidence, therefore, we are not persuaded that the proposed development management-led approach in Policy CS11 can be relied upon to provide for the identified needs in Ipswich.
117. The Planning Policy for Traveller Sites (PPTS) establishes the Government's overarching aim to ensure fair and equal treatment for Gypsies and Travellers, in a way that facilitates their traditional and nomadic way of life, while respecting the interests of the settled community. Accordingly, it requires LPAs to set targets for the likely permanent and transit site accommodation needs of Gypsies and Travellers in their area, and, in preparing their local plans, to identify a supply of deliverable and developable sites to meet those needs over the Plan period.
118. We recognise the challenge of finding small sites for Gypsy and Traveller accommodation, which are suitable, available and likely to be developed. However, as submitted, the Plan fails to comply with national policy, because it does not identify a supply of deliverable and developable sites to meet the accommodation needs of Gypsy and Traveller families over the Plan period. Furthermore, the statement of intent in Policy CS11, that the Council will work with neighbouring authorities to secure provision, is not consistent with the agreed position in the ISPA SoCG⁴⁶. This states that each LPA will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area.
119. Therefore, for soundness, the Plan must identify a deliverable and developable supply and amend the approach set out in Policy CS11 and its supporting text, to comply with national policy. During the Hearing, the Council confirmed that there is capacity at the West Meadows site to provide additional permanent pitches. This is supported by the aerial photographic evidence provided by the Council following the Hearing⁴⁷.

⁴⁵ Paragraphs 153 and 154

⁴⁶ Paragraph C5 of Core Document A21

⁴⁷ Core document K21

Whilst we recognise that increasing the size of an existing large site is not the preferred approach, there are currently no other deliverable or developable sites identified, which can meet the accommodation needs of the Gypsy and Traveller community in the next 5 years and beyond.

120. Accordingly, **MM49** amends Policy CS11 to allocate two extensions to the West Meadows site, totalling 0.5 ha of land, which would be sufficient to meet the remaining identified need for 13 permanent pitches for Gypsy and Traveller accommodation over the Plan period. The Policies Map will need to be amended accordingly. This will ensure that land is available to meet the permanent accommodation needs of Gypsies and Travellers, should small sites not come forward through the development management process, and that the Plan is positively prepared, justified, effective and consistent with national policy in this regard.
121. Consequential MMs are necessary to the remainder of Policy CS11 and to the supporting text, to modify the approach to meeting needs, update the information on need and supply, and delete references to identifying sites for permanent pitches for Ipswich in other parts of the ISPA [**MM46, MM47, MM48, MM49, MM50, MM52, MM53**]. For clarity and consistency with national policy, reference to the revised definition of Gypsies and Travellers in the PPTS is also necessary [**MM45**].
122. With regard to transit pitches, the SoCG between the ISPA authorities confirms that work is proceeding to identify and deliver appropriate sites. Currently, Policy CS11 states that a site will be developed between Ipswich and Felixstowe, but evidence to the Hearing indicated that a number of sites are still being considered. Therefore, changes to Policy CS11 and the supporting text are necessary to clarify this and the Council's commitment to meeting the transit site need, to ensure the Plan is effective and positively prepared in this regard [**MM50, MM51**]. Given that the preferred locations for transit sites may not be within Ipswich, an allocation within the Plan is not appropriate or necessary. But, subject to these MMs, we are satisfied that the policy for the provision of transit sites set out in the Plan, represents a pragmatic and justified approach.

Affordable Housing

123. Policy CS12 sets out a requirement for developments of 15 dwellings or more, or on sites of 0.5 ha or more, to provide at least 15% of the dwellings as affordable housing. This applies across the Borough, except for the allocations at IGS and the northern end of HDL, for which site specific affordable housing requirements are contained in Policies CS10 and ISPA4, considered below.

124. The Affordable Housing Topic Paper⁴⁸ confirms that the Strategic Housing Market Assessment Update (the SHMA)⁴⁹ assesses the need for affordable housing in Ipswich at between 36% and 50% of overall housing need. This represents between 2,980 and 4,140 dwellings over the Plan period. The higher of these two figures represents an unconstrained estimate of the amount of affordable housing required. To seek to deliver this through market housing would require a level of housing development significantly above the standard method LHN requirement, which would result in unrealistic and undeliverable rates of housing development. The lower of the two figures represents a more realistic estimate of affordable housing need in the Borough, based on the evidence in the SHMA.
125. The estimated supply, on the other hand, based on the housing trajectory and rates of 31% and 30% affordable housing at IGS and HDL, respectively, and 15% on all other sites, would be 1,814 units of affordable housing over the Plan period. Therefore, based purely on the evidence of need, the Plan would be justified in seeking more than the proposed minimum target of 15% affordable housing.
126. However, paragraph 34 of the NPPF makes clear that policies setting the level and type of affordable housing required should not undermine the deliverability of the plan. The Council has tested the viability of a 15% policy requirement for affordable housing in the WPVA⁵⁰ and carried out a range of sensitivity tests for changes in other costs and values⁵¹. This shows that schemes with a predominance of houses (65% or more) rather than flats, within the higher value sector of the Borough and on brownfield sites within the lower value areas, are viable to deliver a minimum of 15% affordable housing, alongside other policy costs. However, schemes with a predominance of flats, and all typologies on brownfield land within the lower value parts of the Borough, would not be viably able to support this level of affordable housing, without a reduction in developer profit, threshold land values or other policy costs, or an increase in sales values.
127. Whilst the viability evidence supports a minimum target of 15% affordable housing on most housing-led developments, the same does not apply to flat-led schemes. Accordingly, to ensure Policy CS12 is justified, based on the evidence, and consistent with national policy in not undermining deliverability, changes are required, both to the policy and supporting text, to exempt residential developments comprising 65% or more flats from the requirement to provide affordable housing **[MM55, MM56]**.

⁴⁸ Core Document D53, paragraphs 24-30

⁴⁹ Core Document D16

⁵⁰ Core Document D42

⁵¹ Appendix 13 of Core Document K6

128. With regard to housing schemes on brownfield land within the lower value areas of the Borough, which includes most of the IP-One area, a balanced approach may need to be taken between affordable housing and other policy requirements to achieve viable schemes. However, Policy CS12 allows for a reduced level of affordable housing, where justified on viability grounds. This should provide the necessary flexibility not to place delivery of this type of residential development at risk within the IP-One area.
129. Other changes are necessary to Policy CS12 and its supporting text, and to the Glossary in Appendix 5, to ensure the definitions of affordable housing in the Plan are consistent with national policy **[MM54, MM55, MM152, MM154]**.
130. The Affordable Housing Topic Paper identifies a range of other measures being taken by the Council to increase the supply of affordable housing in the town, in order to meet the shortfall between the SHMA estimate of need and the supply. These include the Council's own home building programme, with a strategic target to deliver 1,000 new affordable homes in the next 10 years on its own land. Whereas market housing schemes can be expected to deliver 15-30% affordable housing on site, sites forming part of the Council's land holding are expected to deliver 70-100% affordable housing.
131. Combined with these measures, and subject to the MMs set out above, we are satisfied that the Plan would make sufficient provision for the affordable housing needs of the Borough.

Housing Type and Tenure

132. Policy CS8 of the CSP requires a mix of dwelling types to be provided within the Borough. The SHMA identifies the need for different sizes of dwellings in Ipswich. In terms of the need for larger houses, the Council's Matter 3 Housing Supplementary Evidence⁵² confirms that there is a need for just over 5,100 homes with 3 or more bedrooms between 2018 and 2036. However, the estimated supply from existing completions, the development of sites with planning permission, the strategic sites and housing allocations in the Plan, and windfall sites, would be around 3,870 dwellings of this size, which would equate to around 75% of the need for larger dwellings.
133. Although there is a potential shortfall in the provision of homes with 3 or more bedrooms, Policy CS8 does expect all major schemes of 10 dwellings or more to provide a mix of dwelling types having regard to the needs identified in the SHMA. The Council has allocated sufficient

⁵² Core Document K6

sites within the Plan to ensure that the overall housing need is met. The potential shortfall in housing of 3 or more bedrooms does not justify the release of more large greenfield sites to meet this need, either within the Borough or in neighbouring Districts within the HMA, which would be contrary to the spatial strategy. Moreover, this is an element of housing delivery that the Council can monitor, and address as necessary when the Plan is reviewed.

134. Changes are required to Policy CS8, for effectiveness, to make it clear that the needs identified in the SHMA will be taken into account when considering the most appropriate mix of homes by size and type for major development proposals **[MM41]**. In order to be consistent with national policy, an amendment is also required to the supporting text to Policy CS8 to change the reference from 'Starter Homes' to 'First Homes' **[MM42]**.

Density of Residential Development

135. Policy DM23 sets out the density of new housing development in Ipswich. Within the Town Centre, Portman Quarter and Waterfront, development will be expected to achieve a high density of at least 90 dwellings per hectare (dph); within the remainder of the IP-One area, District Centres and an 800m area around District Centres, a medium density of at least 40dph will be expected; and elsewhere, low density development will be required, with the average taken as 35dph.
136. The Council's Matter 3 Housing Supplementary Evidence⁵³ demonstrates that the majority of completed flatted developments in Ipswich are typically built at densities above 90dph, and that some developments with a mix of houses and flats have been approved at densities above this. We have also taken account of the Core Strategy Policy Testing undertaken by the Essex Design Initiative⁵⁴, which illustrates the sample schemes used to demonstrate the density capacity of sites in the IP-One area, and Table 20 of the AMR 2018-19⁵⁵, which shows that the densities of schemes within the IP-One area have exceeded 100dph. From the evidence before us, therefore, we are satisfied that the minimum density standard of 90dph within the Town Centre, Portman Quarter and Waterfront is justified, and that this approach would allow for a proportion of the dwellings to be delivered with 3 or more bedrooms, either as houses or flats.
137. We are satisfied that 35dph and 40dph are appropriate minimum densities for housing sites in low and medium density areas of the Borough, respectively, based on the accessibility and character of those areas. For clarity and effectiveness, and to ensure that the policy is

⁵³ Core Document K6

⁵⁴ Core Document K3

⁵⁵ Core Document E1

consistent with paragraph 125 of the NPPF in optimising the use of land, criteria b. and c. of Policy DM23 should be amended to remove the reference to the average densities, and require that at least 40dph and 35dph respectively be achieved **[MM104]**. Corresponding changes are also required to the supporting text and the definition of Density of Residential Development in Appendix 5 **[MM106, MM153]**.

Conclusion

138. Subject to the MMs recommended above, we conclude that the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its provision for housing.

Issue 3 – Are the proposed housing allocations justified, taking into account the reasonable alternatives, positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?

Strategic Allocations

Ipswich Garden Suburb (IGS)

139. IGS is allocated within the 2017 Ipswich Local Plan and, as such, was fully assessed and found sound as a strategic allocation following a previous Examination. The allocation will provide a significant extension to the northern fringe of Ipswich, which is planned to be developed as a garden suburb consisting of 3 neighbourhoods: Henley Gate; Fonnereau and Red House. It is anticipated that the 195ha site will come forward in a number of phases. Design guidance for the masterplanning of this major urban extension is set out in the Ipswich Garden Suburb SPD⁵⁶, adopted in March 2017.

140. The first two phases (N1a and N2a) benefit from outline planning permission⁵⁷, and at the time of our site visit development had commenced on site (Phase N2a). Both phases were subject to Environmental Statements (ESs) to assess their impacts and have been granted planning permission subject to planning obligations under Section 106 and conditions which would ensure adequate mitigation. Furthermore, a Screening and Scoping Opinion has been issued for the Red House Neighbourhood and the ES must address these matters.

⁵⁶ Core Document G18

⁵⁷ References 14/00638/OUT and 16/00608/OUT respectively

141. However, as the remaining phases of IGS still require planning consent, Policy CS10 is necessary to retain the site allocation and guide future applications on it. The policy wording is substantially the same as in the adopted Plan. Therefore, in assessing this strategic allocation as part of this Examination, our role is to ensure that Policy CS10 remains sound and that the development of the site, as anticipated by the housing trajectory, along with the provision of affordable housing, leisure facilities, the District and Local Centres, education facilities and other infrastructure, is justified and effective.
142. In terms of the deliverability of housing on the site over the Plan period, Policy CS10 refers to the development of approximately 3,500 dwellings. However, the new trajectory **[MM159]** indicates that 3,295 dwellings are likely to be built out in the Plan period, with the remaining 205 dwellings in 2036/37. This would include 815 dwellings on Phase N1a, 1,100 on Phase N2a, 924 dwellings on Phase N3a and 456 dwellings on Phases N1b, N2b and N3b. In terms of completion rates, the new housing trajectory anticipates the delivery of between 241 and 288dpa sustained over a 7 year period from 2024/25 to 2030/31, across the first 3 phases, at an average of 274dpa; and between 256-280dpa across all 6 phases over the next 4 years from 2031/32 and 2034/35 at an average of 270dpa. This level of development has not previously been achieved within Ipswich. The only comparable site is at Ravenswood for a total of 1,190 dwellings, which was delivered at an average rate of 132dpa over an 8 year period from 2000/01 to 2007/08, peaking at 226 dwellings in 2002/03.
143. The Council has provided evidence in respect of local examples of sustained high housing delivery in its Housing Data Note⁵⁸. These are at comparable strategic sites in Colchester, comprising Chesterwell (1,600 dwellings) and Kingswood Heath (978 dwellings), which have together delivered an average of 238dpa from 2016/17 to 2019/20 peaking at 283 and 292dpa in 2017/18 and 2018/19 respectively. This evidence suggests that the rates projected for IGS are deliverable in this area. This rate of delivery is also supported by the developers of IGS. We are satisfied, therefore, that the evidence is sufficient to justify a projected sustained rate of housing delivery averaging 270-274dpa over 11 years of the development at IGS, and that the completions set out in the new trajectory are deliverable and developable.
144. Changes are required to Policy CS7 for effectiveness to update the supply at IGS, including amendments to the number of completions and dwellings now benefitting from planning permission **[MM36]**. However, given the anticipated level of overall development at the IGS over the

⁵⁸ Core Document K20

Plan period, so that the contribution of IGS to the housing land supply is justified, a change is required in Policy CS10 to reflect the likely development of 3,295 dwellings by the end of the Plan period, rather than 3,500 dwellings **[MM43]**.

145. Policy CS10 continues to seek an overall target of 31% affordable housing at IGS, with the level of affordable housing in each individual application to be the maximum compatible with achieving the overall target and achieving viability. The policy also states that each phase of development will be subject to a cap of 35% affordable housing. Although the planning permissions for residential development on the first 2 phases of development have secured only 5% and 4% affordable housing, the Council's evidence⁵⁹ explains how the target and cap work, and can still be achieved, if further viability reviews, undertaken twice for each phase, show that higher levels of affordable housing can be delivered, as scheme viability improves over time.
146. Viability review mechanisms have been built into the Section 106 Agreements attached to the planning permissions for the first two phases. So, although 4% and 5% are set as the minimum affordable housing thresholds in these phases, if higher rates can be achieved up to 35%, this would enable 31% affordable housing to be delivered across the development as a whole. As such, both 31% and 35% are mathematically achievable across the development.
147. The evidence in the WPVA⁶⁰ indicates that IGS is viable at 31% affordable housing, subject to the scale of infrastructure required. We note that the assumed infrastructure costs for IGS within the WPVA are significantly lower than the infrastructure costs in the agreed appraisals for the first two phases. However, the site specific appraisal of the IGS⁶¹ also found 30.6% affordable housing to be viable on 3,500 units, assuming average per acre infrastructure costs which were above those in the appraisals for the first two phases.
148. Therefore, based on all of the evidence before us, we are satisfied that a target of 31% affordable housing is justified and reasonable, together with a cap of 35%. The policy is sufficiently flexible to allow any unforeseen viability problems to be dealt with when planning applications come forward.
149. As for the effectiveness of the viability review provisions in Policy CS10, these are the same as in the adopted plan, which have enabled suitable review mechanisms and triggers to be agreed in the Section 106

⁵⁹ Core Documents K22 and K23

⁶⁰ Core Document D42, paragraph 5.99

⁶¹ Core Document D46

Agreements for the first two phases of IGS. Accordingly, we do not consider that any changes to the affordable housing provisions in Policy CS10 are justified or necessary for soundness.

150. The IGS will include the provision of a secondary school in the Red House neighbourhood and 3 primary schools, one in each neighbourhood. The Policies Map identifies the sites for the proposed secondary and primary schools in the Red House neighbourhood as 9ha and 2ha respectively. However, the Option Agreement between SCC and the developer of this neighbourhood includes a single site of 10.9ha in the same location for both schools. No change is required to Policy CS10 in order for it to be effective. However, a change to the annotation on the Policies Map may be necessary to show that this is the broad, rather than specific, location for the proposed schools.
151. A country park will be provided as part of the IGS. For clarity and effectiveness, a change is required to Policy CS10 to ensure that the 24.5ha set aside for this is expressed as a minimum and not a total area **[MM43]**.
152. Strategic transport modelling⁶² has been undertaken using the Suffolk County Transport Model, including the application of mitigation measures, which would be used to support the growth identified in the Plan. Further sensitivity testing⁶³ was undertaken following concerns expressed during the Hearing about differences in the housing delivery trajectories assumed in the ISPA strategic modelling for IGS and that included in the IBC Topic Paper⁶⁴.
153. The sensitivity testing reviewed the modelled capacity of junctions on the A1214 with Westerfield Road and Tuddenham Road, taking account of traffic growth from housing developed at IGS by 2026. Overall, it concludes that while congestion is shown to increase on the A1214 corridor without any highway mitigation in place at the two specified junctions, with certain junction arms becoming at or near capacity, these junctions would continue to operate within capacity at 2026 without any further mitigation. The A1214 junction mitigation related to the IGS development is considered likely to be delivered in 2027 or 2028, thereby alleviating the congestion issues at these locations at the earliest opportunity during the Plan period.
154. In our opinion, the evidence robustly demonstrates that the combination of road junction improvements associated with IGS and sustainable transport measures to achieve a modal shift of 15%, as

⁶² Core Documents D35 and D36

⁶³ Core Document K14

⁶⁴ Core Document I6

considered earlier in this Report, would be sufficient to mitigate impacts of the development on the transport network.

155. Policy CS10 requires that development proposals are in accordance with the IGS SPD. However, SPDs are defined in the NPPF as documents that add further detail to the policies in the development plan, and which are capable of being a material consideration in planning decisions, but are not part of the development plan. As such, a requirement for proposals to be in accordance with the SPD is not consistent with national policy. An amendment to Policy CS10 is therefore required for effectiveness to refer to development proposals having regard to the SPD to ensure that it is consistent with national policy and to ensure that it is clear that the SPD will guide, rather than identify, the detailed location of the District and Local Centres **[MM43]**.
156. The detailed strategic and neighbourhood infrastructure requirements for the development at IGS are included in Table 8B of the Plan, with triggers for their delivery to be identified through the IGS Infrastructure Delivery Plan (IDP). Policy CS10 requires that future planning applications for this site shall be supported by the IDP, based on the identified infrastructure requirements set out in Table 8B. This approach is effective in ensuring the timely delivery of infrastructure to support the development of IGS. Therefore, changes are not required to Table 8B, to include details of the sequencing and delivery of infrastructure, as these are not necessary for the Plan to be effective.
157. In terms of specific items of infrastructure, Policy CS10 makes it clear that an on-site library will be provided within the District Centre to be located within the Fonnereau Neighbourhood. This has now been secured through the Section 106 Agreements, along with financial contributions towards a fortnightly outreach visit from Suffolk Libraries Local. Although the County Council originally sought a contribution towards off-site provision, there is no evidence to indicate that this remains. Indeed, the provision of on-site facilities is sufficient to meet the needs of the development and, as such, a change to Table 8B to include a contribution to off-site library services, would not be justified.
158. Table 8B includes any strategic improvements to the water supply and sewerage system. Outline planning permission for development on IGS will only be granted subject to planning conditions which require a site-wide foul water drainage strategy, with a site specific approach identifying what is required for each development, in consultation with Anglian Water. In respect of the Henley Gate Neighbourhood, the foul water drainage strategy has identified the need for the provision of 2 pumping stations and offline foul water storage. Anglian Water does not consider it necessary to include these details in Table 8B. We concur with this view,

as it is evident that Table 8B requires strategic improvements to be provided to the water supply and sewerage system at IGS, and it enables the Council to secure the required infrastructure for each phase of the development, with the exact details being secured through planning conditions. Furthermore, Policy DM4 requires that adequate sewage treatment capacity and foul drainage already exists or can be provided to serve the development. We are satisfied, therefore, that Table 8B is effective in this regard and that no changes are required to it.

159. The provision of primary road infrastructure is not included within Policy CS10, although reference is included to it in Table 8B. Nevertheless, for consistency and in order that the policy is effective, the provision of primary road infrastructure, including a road bridge over the railway to link the Henley Gate and Fonnereau neighbourhoods should be included in Policy CS10 **[MM43]**.
160. Finally, following changes to the UCO, amendments are required to Policy CS10 for effectiveness to make it clear which type of service uses should be provided in the new District Centre within the Fonnereau neighbourhood and the two local centres located in Henley Gate and Red House neighbourhoods **[MM43]**.
161. Subject to the MMs set out above, we are satisfied that the development of the majority of this strategic allocation is deliverable within the Plan period, and that Policy CS10 is sound.

Northern End of Humber Doucy Lane (HDL) (Policy ISPA 4)

162. Policy ISPA4 allocates 23.62ha of land for the provision of housing and associated infrastructure, at the northern end of HDL (Site ISPA4.1). The site comprises 4 parcels of land and is part of a cross-boundary strategic housing allocation on the north-eastern boundary of the Borough, the remainder of which is located in East Suffolk.
163. Overall the cross-boundary allocation is estimated to deliver approximately 650 dwellings, of which 496 would be in Ipswich Borough, based on the figure in the submitted Plan, and 150 dwellings in East Suffolk, allocated in Policy SCLP12.24 of the adopted Suffolk Coastal Local Plan. An amendment to the site area is shown in the Schedule of Proposed Changes to the Policies Map⁶⁵ to remove a small field opposite Westerfield House from the proposed allocation, which is no longer available for development. However, the parcel of land is not large enough to reduce the overall dwelling capacity of the site.

⁶⁵ Core Document L7

164. In examining the soundness of this strategic allocation, we have considered whether it is justified against reasonable alternatives and can be delivered within the Plan period. We have also considered whether its impacts on the highway network, infrastructure, heritage, landscape, ecology and the amenities of nearby communities, can be acceptably mitigated, so that it would be consistent with national policy in delivering sustainable development.
165. With regard to the selection of the site, the SA considered reasonable alternatives to the allocation of land at HDL, including other sites on the edge of the urban area at Thurleston Lane and Whitton Church Lane. It also considered the potential for the housing needs of the Borough to be met through higher density urban regeneration within the town and development beyond the Borough boundary in East Suffolk. Therefore, alternatives to allocating the HDL site were considered, and the reasons for selecting both the spatial strategy of regeneration and sustainable urban extensions, and the HDL site as one of those strategic sites, have been adequately explained and justified in the SA.
166. Access to the site would be taken from Tuddenham Road and HDL, both of which currently operate with two-way traffic. But given the location of the site on the edge of Ipswich, around 3.5 km from the town centre, accessibility improvements will be required. Whilst there are opportunities to improve the junction of HDL and Tuddenham Road and the width of HDL on land within the site, the Highway Authority acknowledges that the options to significantly increase traffic capacity are limited by space constraints.
167. Therefore, the transport and access strategy for the site, relies on good quality walking, cycling and bus routes to the town centre and local services and facilities, plus other sustainable transport measures to manage travel demand, encourage modal shift and contain road traffic growth. The site is already served by buses to key destinations, and the Highway Authority confirmed that the necessary travel improvement schemes to maximise the use of sustainable transport modes are achievable in proportion to the scale of development.
168. Currently, Policy ISPA4 identifies the need for transport network improvements, but not demand management measures to mitigate impacts. Accordingly, **MM17** includes wording to this effect in the policy, with reference to the ISPA Transport Mitigation Strategy. **MM18** and **MM22** make consequential amendments to the supporting text, including the need for financial contributions towards sustainable transport measures.
169. In terms of proximity to local facilities, Rushmere Primary School and Northgate High School are within close walking distance, but currently

there are no available school places at the primary school. The number of dwellings proposed on the cross-boundary site at HDL would not be large enough to support a new primary school. However, three new primary schools are being planned as part of IGS, with the capacity to support future demand from HDL, including one on Phase N3a at Red House Farm, within walking distance of HDL. However, this means that the availability of primary school places at IGS is a constraint on the timescale for the development of new homes on the HDL site.

170. Housebuilding has already commenced on Phase 2a of IGS off Henley Road, and the new housing trajectory **[MM159]** projects that around 2,100 dwellings will have been completed across all 3 phases of IGS by 2031/32, when housebuilding on HDL is due to commence. Based on the evidence of SCC as the Local Education Authority (LEA), this should provide sufficient dwelling capacity at IGS to support the first two primary schools and possibly all three, and, therefore, provide the necessary primary school capacity for the HDL site. Nevertheless, to ensure that the Plan is effective and positively prepared in co-ordinating the provision of school places with housebuilding at HDL, **MM17** adds two new criteria into Policy ISPA4, so that development at HDL is either triggered by the provision of primary school capacity on IGS, or an agreement with the LEA to provide a primary school on the HDL site.
171. The site is located within the catchment of the Two Rivers Medical Centre, 1.8 km to the south, where primary health care would be prescribed. There are regular bus services along HDL to the health centre. The development is at a scale where the demand on health care services would need to be mitigated, by means of a financial contribution towards off-site facilities. **MM17** and **MM18** include this provision in Policy ISPA4 and the supporting text, in order that it is positively prepared and consistent with national policy in this regard.
172. Currently Policy ISPA4 does not require any convenience shopping facilities on site, but it is in excess of 800m from the nearest existing local shopping facilities. As such, without on-site provision, future residents are likely to drive to nearby shops, which would not be consistent with national policy in enabling the delivery of sustainable development. Therefore, modifications to the policy and supporting text are necessary to require consideration to be given, as part of the masterplanning work, to opportunities to provide convenience retail facilities on site, which could serve both existing and new residents **[MM17 and MM18]**.
173. There are a number of designated heritage assets adjacent to the boundaries of the site. They comprise the Grade II listed Westerfield House, fronting HDL on land between two of the site parcels; and

Grade II listed Allen's House, Lacey's Farm and the Garden Store north of Villa Farm, to the east of the site boundary. All currently lie within a surrounding setting of open farmland, and therefore the development of the HDL site could affect their significance. The land to the immediate south and east of Westerfield House is excluded from the site boundary, as it is the subject of a separate permission for a care village, which would separate any development on the HDL site from the listed building. Mature trees, hedges and farm buildings also provide a degree of screening for Allen's House and Lacey's Farm along the eastern boundary of the site.

174. However, the Council submitted a Heritage Impact Assessment (HIA)⁶⁶ for the site, along with a SoCG with Historic England⁶⁷, which identify a number of mitigation measures, including a reduction in site capacity from 496 to 449 dwellings to allow a buffer of space and/or landscaping at the site boundaries closest to these heritage assets. **MM17** and **MM19** incorporate these changes into Policy ISPA4 and the supporting text, which are necessary to ensure effectiveness and consistency with national policy in requiring future applications to have regard to the impact of development on the settings and significance of these assets. A consequential amendment to Policy CS7 is necessary to reduce the dwelling capacity for site ISPA4.1 to 449 dwellings [**MM36**].
175. The policy and supporting text do not currently address the potential for archaeological remains within the site. It was confirmed by SCC that the fields had not previously been systematically investigated for remains, although they are located in an area where dispersed archaeological remains related to landscape use may be anticipated. For consistency with national policy, changes to Policy ISPA4 and supporting text are necessary to require archaeological evaluation to inform future planning applications [**MM17, MM20**].
176. In terms of the impact of development on the surrounding landscape and the rural setting of nearby villages, the site is separated by open fields from Rushmere St Andrew to the east, and from Westerfield and Tuddenham to the west and north. However, maintaining that separation will be important to preserving the rural setting of these villages.
177. Policy ISPA4 currently limits new homes to the south of the railway line, which acts as a natural barrier to the further encroachment of the urban edge of Ipswich towards Westerfield and Tuddenham. However, this would have no effect in maintaining the separation between Ipswich and Rushmere St Andrew, which is located south of the railway line.

⁶⁶ Core Document I30.3

⁶⁷ Core Documents I30.1 and I30.2

Therefore, so that Policy ISPA4 is effective in protecting the landscape between the site and Rushmere St Andrew, **MM17** includes an additional criterion to ensure development on the site maintains the separation and uses green infrastructure to create a transition between the development, as the new urban edge of Ipswich at this point, and the rural landscape to the north and east.

178. The Site Sheet for ISPA4.1 at Appendix 3 of the SAP contains other development requirements, which, for clarity and effectiveness, should be contained in the policy or its supporting text. These include the proportion of the site allocated for housing (60%) and for secondary uses including open space, green infrastructure and community facilities (40%); the need for landscaping proposals on the site to be informed by the Ipswich Wildlife Audit; and the preservation of trees along the boundary with Westerfield House [**MM17, MM20**].
179. Other amendments to Policy ISPA4 are necessary for clarity, effectiveness and consistency with national policy. These include the requirement for a site specific FRA and project level HRA to be submitted with any application; that development proposals should include links to the 'green trail' walking and cycling route around the edge of Ipswich, rather than incorporate the 'green trail', which would be an unnecessary stricture on the use of open space and green infrastructure on the site; to specify the need for open space to meet the standards set out in SPD; and to ensure the need for a SANG is correctly stated [**MM17, MM21**]. The structure of the policy has also been amended to ensure the development criteria are unambiguous and to make it consistent with Policy SCLP12.24 of the adopted Suffolk Coastal Local Plan in steering the cross-boundary delivery [**MM17**]. We have also made minor amendments to the wording of the policy in **MM17**, as it was published for consultation, to correct a typographical error and include a reference to Policy SCLP12.24.
180. In terms of the viability and deliverability of the proposed development, the WPVA shows it would be able to provide 30% affordable housing on site, and generate a £12 million surplus, after developers' profit and a £77,000/acre allowance for infrastructure costs. Overall, this equates to a healthy margin for viability, and suggests the site should be viably able to support the range of on and off-site infrastructure costs required in the policy, as modified. Provision of 30% affordable housing would also make a useful contribution to meeting affordable housing needs in Ipswich. For clarity this needs to be recognised in Objective 2 of the Plan [**MM3**].
181. Subject to the MMs to Policy ISPA4 and its supporting text, set out above, we consider the allocation of land at the northern end of HDL is justified against reasonable alternatives based on proportionate

evidence, effective in terms of its deliverability over the Plan period and as a cross-boundary strategic matter, and consistent with national policy in enabling the delivery of sustainable development.

Housing Allocations inside and outside the IP-One Area

182. The SAP allocates sites for housing development in Policy SP2 and identifies land with planning permission for residential development or awaiting a Section 106 Agreement, with a resolution to grant planning permission, in Policy SP3. These policies include sites both in the IP-One Area and outside it. In addition, a number of these sites are proposed for a mix of uses and, as such, are also allocated in other policies in the SAP for employment, open space, leisure or community facilities, transport infrastructure and/or retail uses, set out in Policies SP5, SP6, SP7, SP9 and SP10 respectively. Furthermore, the SAP includes Appendix 3 which provides details relating to development constraints and issues for each allocated site.
183. This approach to site allocations within the SAP is confusing and unclear. Furthermore, it is unclear which policies and proposals relate to the IP-One Area alone and are therefore within the IP-One Area Action Plan (AAP). For clarity and to ensure that the SAP and the AAP are effective, several MMs are required. Firstly, Policy SP2 should be amended to include only the housing allocations proposed outside the IP-One Area **[MM168]** and a New Policy formed to include housing allocations within the IP-One Area **[MM268]**. Both policies should include more detailed information relating to site constraints and issues, along with a plan showing the extent of each allocation. These are currently included on the Site Sheets in Appendix 3 of the submitted Plan, which are not part of the policies of the SAP, and, therefore, it is unclear what weight should be attached to them for decision making purposes **[MM168, MM268]**. Changes are also required to the supporting text to Policy SP2 **[MM169, MM170, MM171, MM172, MM173, MM174]** and new supporting text to follow the New Policy **[MM269]** for effectiveness. A minor amendment is necessary to the final paragraph of **MM174**, as published for consultation, to correctly reference the site with access constraints as Site IP221.
184. Secondly, Policy SP3 should be amended to include only those sites with planning permission, or a resolution to grant planning permission, subject to the signing of a Section 106 Agreement, outside the IP-One Area **[MM175]**. A New Policy should be formed to include such sites within the IP-One area **[MM270]**. Both policies should include more detailed information, currently included on the Site Sheets in Appendix 3, relating to constraints and issues, along with a plan showing the extent of each allocation. Changes are also required to the supporting text to

Policy SP3 **[MM176, MM177]** and new supporting text to follow the New Policy **[MM271]** for effectiveness.

185. Thirdly, allocations for mixed use development, including those with an element of housing, are required for effectiveness. Each one should be subject to a separate New Policy, with a distinction made between those within the IP-One Area **[MM279, MM281, MM283, MM285, MM287, MM289, MM291, MM293, MM295, MM297, MM299, MM301, MM303, MM305, MM307]** and those outside **[MM199, MM201, MM203, MM205, MM207, MM209]**. Again, these new policies should include more detailed information, currently included on the Site Sheets in Appendix 3, relating to constraints and issues, along with a plan showing the extent of each allocation. New supporting text is also required in respect of the New Policies in the IP-One AAP **[MM280, MM282, MM284, MM286, MM288, MM290, MM292, MM294, MM296, MM298, MM300, MM302, MM304, MM306, MM308]** and those outside **[MM200, MM202, MM204, MM206, MM208, MM210]**. As a result of these changes, Appendix 3 should be deleted for clarity and effectiveness **[MM312]**.
186. Finally, there is a requirement for the SAP to be restructured, to include a separate and clearly identified AAP in order that both plans are effective. The policies within the AAP and the necessary MMs are discussed in more detail later in this Report. These changes would address the problems with the structure and content of the site allocations policies, and ensure that the Plan is clear, unambiguous and sound in this regard.

Land Allocated for Housing in Policy SP2

187. Overall, the sites allocated for housing in Policy SP2 of the submitted Plan have been selected using a robust Strategic Housing and Economic Land Availability Assessment⁶⁸ (SHELAA) process, which is consistent with national policy and has thoroughly assessed all options against the same criteria. As set out above, changes are required to Policy SP2 and its supporting text for effectiveness to ensure that it only includes housing allocations outside the IP-One area. Changes are also required to incorporate more detailed information relating to constraints and issues, previously included on the Site Sheets in Appendix 3, along with a plan showing the extent of each allocation, so that it is clear to applicants and decision makers that these constitute policy requirements **[MM168, MM169, MM170, MM171, MM172, MM173, MM174]**.
188. Furthermore, the supporting text should be amended for effectiveness to reflect changes made to the likely number of dwellings on allocated sites, to be clear that those sites allocated in Policy SP2 are for solely

⁶⁸ Core Document D13

residential use and that they will deliver a proportion of the housing requirement **[MM167]**. Consequential changes are also required for effectiveness to Policy CS7 in the CSP to refer to 'site allocations through policies in the SAP and AAP' rather than to Policy SP2 specifically; and to reflect the likely number of dwellings on allocated sites. Some of the sites allocated in Policy SP2 are considered in more detail below.

189. The issue of whether the housing land supply is adequate to demonstrate a deliverable 5 year housing land supply and a developable supply over the remainder of the plan period to meet the stepped requirement, is considered later in this Report.

Victoria Nurseries, Westerfield Road (IP009)

190. This site is allocated in Policy SP2 for residential development, with an indicative capacity of 12 dwellings and a likely delivery timescale of the short term. It has been allocated for residential development in an adopted Plan since 1997, but has yet to be developed. It is currently used as a garden nursery, which is subject to a temporary planning permission. At the Hearing the Council confirmed that there has been some recent interest in this site for the development of a residential care home, which has culminated in the submission of a planning application.
191. From the evidence before us, it is likely that some form of residential development will come forward on this site. However, in order to more accurately reflect the current position, we consider that this site would be more likely to come forward in the medium term and that its development in year 6 as shown in the new trajectory **[MM159]** would be justified. Although the site is allocated for 12 dwellings, if planning permission were granted for a residential care home, this would also contribute to the housing supply. Therefore, we consider this site is developable, subject to the change to its likely delivery timescale shown in the new trajectory.

JJ Wilson and Land to rear at Cavendish Street (IP066)

192. Policy SP2 allocates this site for residential development, with an indicative capacity of 55 dwellings, and delivery likely to be in the medium term. However, the Council's Five Year Housing Supply Delivery Table⁶⁹ indicates that this site could come forward in year 5, which is short term. The site is in five main ownerships, with only three of the landowners confirming their interest in progressing the site now. Although this represents a substantial part of the site and we note that some parts of the site have been the subject of pre-application discussions in the past, given the constraints associated with multiple

⁶⁹ Core Document K18

ownerships, along with a requirement to relocate existing businesses and the possibility of contamination, we are not satisfied that this site would be deliverable in year 5.

193. The Council is in the process of discussing the development of this site with Homes England and their involvement may bring forward the site a little earlier. However, given the nature of the site and its associated constraints, we consider that a more cautious approach to its development is justified.

194. On the evidence before us, the development of this site in years 6 and 7 as shown on the new trajectory **[MM159]** is justified.

Former British Energy Site, Cliff Quay (IP067a)

195. This site is allocated for residential development in Policy SP2, with an indicative capacity for 17 dwellings to be delivered in the long term. It comprises an area of landscaping, mainly laid to grass, situated between a car park serving an adjacent employment use and existing residential properties on Sandyhill Lane. The site is in a suitable location for residential development, but also lies around 200 metres to the north-west of Cliff Quay Water Recycling Centre (WRC). Odour dispersion modelling shows the southern end of the site to be within the 3ou/cubic metre (m^3)⁷⁰ contour, which is considered likely to impair residential amenity. Incidents of short duration odour emissions are experienced in areas beyond the 3ou/ m^3 contour, as evidenced by the spread of complaints received by the Council⁷¹. However, these occur mainly to the north-east of the WRC, in the direction of prevailing wind from the south-west, with very few in the vicinity of site IP067a, which lies to the north-west of the WRC. Furthermore, recent housing development in Pipers Vale Close adjacent to IP067a, also partly within the 3ou/ m^3 contour, suggests that housing can be viably delivered here and would be attractive to the market.

196. Based on the evidence, it is likely that any odour impacts on future residents of the site would be limited and intermittent. We are satisfied that this is a matter that can be mitigated at the planning application stage, through a suitable layout ensuring dwellings would be located outside of the 3ou/ m^3 contour. **MM168** includes a constraint criteria to ensure this.

197. In the site sheets in Appendix 3 of the submitted SAP, this site is grouped together with site IP067b, which is separately allocated for employment uses in Policy SP5. As such, they were subject to the same list of

⁷⁰ Ou/ m^3 = odour unit per cubic metre and is a unit measure of odour concentration

⁷¹ Set out in Core Document K25

development constraints. However, it is evident that the requirement for a reptile survey relates to site IP067b, which lies adjacent to a County Wildlife Site and contains part of a Local Wildlife Site, but not site IP067a, which is separate from these designations. In addition, signal control on Landseer Road/ Sandyhill Lane is considered likely to be necessary mitigation for site IP067b, but not site IP067a, given its limited likely traffic generation. These distinctions were not made clear in the MMs published for consultation. Accordingly, we have amended the wording of the constraints relating to site IP067a in **MM168**.

Corner of Hawke Road and Holbrook Road (IP125)

198. This site is allocated in Policy SP2 for 15 dwellings, with a likely delivery timescale of the short term. The Council's Five Year Housing Supply Delivery Table confirms that this site is owned by the Council and that it is in the control of the Council's arm's length house building company, Handford Homes. A development agreement with Handford Homes has been authorised by the Council, along with funding, and a project brief has been prepared. From the evidence before us, therefore, we are satisfied that this site is deliverable and that its anticipated development in year 3 on the new trajectory [**MM159**] is justified.

112-116 Bramford Road (IP135)

199. Policy SP2 allocates this site for residential development (19 dwellings), with a likely delivery timescale of the medium term. Although a temporary planning permission exists for the use of the site as a car wash, car sales and MOT bay until 1 October 2021, the Council's Five Year Housing Supply Delivery Table confirms that the site is owned by a development company who is keen to develop a viable housing scheme. Nevertheless, we consider that the completion of this site in year 5 would be optimistic as there is no clear evidence that firm progress has been made towards the submission of a planning application, site assessment work or site viability. As such, it would not be deliverable.

200. From the evidence before us, however, we are satisfied that this site is developable and that its anticipated development in year 6 on the new trajectory [**MM159**] is justified.

Prince of Wales Drive (IP307)

201. This site comprises a former local centre, which is allocated for 12 dwellings in Policy SP2, with a timescale for delivery in 2022/23. A detailed planning application from a local registered provider for a scheme of 15 affordable dwellings on the site was under consideration

at the time of the Hearing⁷², indicating that the redevelopment of the site would take place within this timescale. Although at the time of our site visits work had not started on site, we have not been provided with any evidence to suggest that the homes will not be delivered within the first 5 years. On this basis, the site should be considered deliverable, according to the definition in the NPPF. Modifications are required to amend the site capacity to 15 dwellings in Policy SP2 **[MM168]** and the trajectory **[MM159]**.

Housing Sites with Planning Permission or Awaiting a Section 106 Agreement in Policy SP3

202. Policy SP3 allocates sites with planning permission, or with a resolution to grant planning permission subject to the signing of a Section 106 Agreement. Therefore, the principle of development has already been established on these sites. As set out above, changes are required to Policy SP3 and its supporting text for effectiveness to ensure that it only includes housing allocations outside the IP-One area. Changes are also required to incorporate more detailed information relating to constraints and issues, previously included on the Site Sheets in Appendix 3, along with a plan showing the extent of each allocation, so that it is clear to applicants and decision makers that these constitute policy requirements **[MM175, MM176, MM177]**. Some of the sites allocated in Policy SP3 are considered in more detail below.

Arclion House and Elton Park, Hadleigh Road (IP059a & b)

203. This site is allocated for 103 dwellings in Policy SP3, with a likely delivery timescale of the short to medium term. The Council's Five Year Housing Supply Delivery Table confirms that outline planning permission has been granted, subject to the signing of a Section 106 Agreement (Reference IP/16/01220/OUT and B/1700037/O), for up to 128 units (Class C3) and a 60 bed care home, within Ipswich Borough and Babergh District, of which 103 dwellings are within Ipswich. Demolition has taken place and the site has been cleared ready for development. Confirmation of the site's deliverability, subject to new funding arrangements being put in place, has been provided by the site owner⁷³, and it is noted that the Council is in discussions with Homes England in respect of delivery of this site.

204. From the evidence before us, we are therefore satisfied that this site is deliverable and developable and that its anticipated development in years 4 to 6 on the new trajectory **[MM159]** is justified.

⁷² Application reference 20/00367/FUL

⁷³ Core Document I23

391 Bramford Road (IP106)

205. Policy SP3 allocates this site for 11 dwellings with a likely delivery timescale of the short term. The Council's Five Year Housing Supply Delivery Table confirms that planning permission has been granted (Refs. 18/00032/FUL and 19/00045/FUL) and that the development is under construction. From the evidence before us, we are therefore satisfied that this site is deliverable and that its anticipated development in year 1 on the new trajectory **[MM159]** is justified.

R/O Jupiter Road and Reading Road (IP109)

206. This site is allocated for residential development (13 dwellings) in Policy SP3, with a likely delivery timescale of the short term. Planning permission has been granted, subject to the signing of a Section 106 Agreement (Ref. 12/00192/FUL). However, the Council's Five Year Housing Supply Delivery Table confirms that a more recent planning application for 6 dwellings has been received (Ref. 20/01066/FUL) and is being considered by the Council.

207. From the evidence before us, therefore, we are satisfied that this site is deliverable, but for 6 dwellings, and that its anticipated development in year 4 on the new trajectory **[MM159]** is justified. So that the allocation is justified and effective, Policy SP3 should also be amended to reflect the smaller number of dwellings now proposed **[MM175]**.

Milton Street (IP131)

208. Policy SP3 allocates this site for residential development for 9 dwellings, with a likely delivery timescale of the medium term. The site benefits from planning permission (Ref. 18/00552/FUL), but it has yet to be marketed to a housebuilder or developer. The existing commercial units on the site are still occupied and the Council's Five Year Housing Supply Delivery Table confirms that a renewal of the existing permission may be needed. The site is allocated in a high value area of the town and, given this, there is an expectation that its development will come forward in the first five years.

209. However, representations on the MMs, highlighted that the boundary of site IP131 shown on the site plan in MM175 and on the Policies Map, has been incorrectly drawn to include a small parcel of land within the ownership of 49 and 51 Milton Street. So that the allocation can be effectively implemented, we have amended the boundary of the site within Policy SP3 **[MM175]** to exclude this parcel of land. A consequential change should be made to the boundary of the site on the Policies Map.

210. Subject to this change, from the evidence before us, we are satisfied that this site is deliverable and that its anticipated development in year 3 on the new trajectory **[MM159]** is justified.

Former Norsk Hydro Limited, Sandyhill Lane (IP143)

211. This site is allocated in Policy SP2 for residential development for 85 dwellings, with a likely timescale for delivery of the short term. The Council's Five Year Housing Supply Delivery Table confirms that the site now benefits from outline planning permission (Ref. 17/00769/OUT) and, therefore, for consistency and effectiveness, the site should be included within Policy SP3 **[MM175]**. The site is within the control of a developer and the Council has entered into a SoCG which confirms that the development will be completed in years 3 and 4. From the evidence before us, we are therefore satisfied that this site is deliverable and that its anticipated development in years 3 and 4 on the new trajectory **[MM159]** is justified.

Ravenswood U, V, W (IP150a)

212. This site is allocated in Policy SP3 for residential development for 94 dwellings, with a likely timescale of the short term. The Council's Five Year Housing Supply Delivery Table confirms that the site is owned by the Council and will be developed by Handford Homes. It also states that a planning application (Ref. 20/00781/FUL) was due to be considered by the Planning Committee in March 2021, with an Officer recommendation for approval. In addition, we note the SoCG with Handford Homes⁷⁴ and the Addendum in Appendix 2 of the Council's Matter 3 Housing Supplementary Evidence⁷⁵, which refers to a programme for delivery being in place, with the site expected to be completed by the end of 2023.

213. In respect of concerns raised about the highway capacity in the Ravenswood area, SCC put forward options⁷⁶ for managing the impact of the proposed development at this and the allocated sites at Nacton Road, South Ravenswood (IP150b, IP150c, IP150d, IP150e and IP152). This included improvements to Thrashers roundabout, moving the bus gate to split traffic movements between Thrashers roundabout and Maryon Road, and local restrictions to manage traffic flows and provide bus priority movement through the area. Based on this evidence, we are satisfied that traffic generated by the proposed development of this site, along with the neighbouring allocated sites, could be safely accommodated on the local highway network.

⁷⁴ Core Document I27

⁷⁵ Core Document K6

⁷⁶ Ravenswood Capacity Management Options (K11), dated December 2020

214. Accordingly, we are satisfied that this site is deliverable and that its anticipated development in years 2 and 3 on the new trajectory **[MM159]** is justified.

Westerfield House, Humber Doucy Lane (IP280)

215. Although it is not allocated in the submitted Plan, the Council granted planning permission for 38 additional bedrooms to a residential care home and 7 assisted living residential units (Ref. 14/01039/FUL), and outline planning permission for 147 assisted living units and 2 staff/director dwellings (Ref. 18/00526/OUT) on this site. We deal with the contribution of care home places to the housing land supply below. The Council's Five Year Housing Supply Delivery Table indicates that the owner of the site is actively progressing a reserved matters application, and that work has commenced on the 7 assisted living units and two-storey extension to provide 38 additional bedrooms for the care home on the site. To give greater certainty over its delivery and to plan positively for meeting housing needs, this site should be included within Policy SP3 as an allocation **[MM175]**.

216. From the evidence before us, we are satisfied that the whole of this site is deliverable and that its anticipated development in years 1 and 3 to 5 on the new trajectory **[MM159]** is justified.

Mixed Use Development outside the IP-One Area

217. As set out earlier in this Report, allocations for mixed use development, including those with an element of housing, are required for effectiveness. Each one should be subject to a separate New Policy. These new policies should include more detailed information relating to constraints, previously included on the Site Sheets in Appendix 3 in the submitted Plan, along with a plan showing the extent of each allocation, so that it is clear to applicants and decision makers that these constitute policy requirements. Additional supporting text, setting out the reasons for these mixed use sites is also necessary for clarity and effectiveness **[MM198]**. The New Policies for mixed use sites outside the IP-One area are set out in more detail below.

Nacton Road, South Ravenswood (IP150b, IP150c, IP150d, IP150e and IP152)

218. These sites are allocated for residential development in Policy SP2 (IP150d (34 dwellings) and IP150e (126 dwellings), employment uses and a park and ride (IP150c and IP152), and a Sports Park (IP150b)). Given the close proximity of these sites and their inter-relationship a co-ordinated approach to their development is required. Therefore, in order for the SAP to be clear and effective, these sites should be

allocated for this mix of uses within a single New Policy with appropriate supporting text, which identifies the requirements for a masterplan approach to the development of this area **[MM199, MM200]**.

219. The Council's Five Year Housing Supply Delivery Table indicates that IP150e is owned by the Council, as are all of the Ravenswood allocated sites, and will be built out by Handford Homes, with a planning application likely to be submitted in 2022. A SoCG with Handford Homes⁷⁷ and the subsequent addendum⁷⁸, also included in Appendix 2 to the Council's Matter 3 Housing Supplementary Evidence⁷⁹, considers that the scheme will be brought forward in 2024 for delivery by the end of 2027. From the evidence before us, we are satisfied that this site would be deliverable and developable and that its anticipated development in years 4 to 6 on the new trajectory **[MM159]** is justified.
220. Although the SoCG refers to the completion of IP150d in year 4, the Council's Hearing Position Statement refers to the delivery scheduled for years 6-10, with some mitigation required to address access constraints. Indeed, from the evidence before us, we are satisfied that this site would be developable and that its anticipated development in year 8 on the new trajectory **[MM159]** is justified.
221. The allocation of IP150b for outdoor sport and recreation uses within Use Class F2(c) would be appropriate and justified, given its siting on the edge of the existing and proposed residential development at Ravenswood. The site is sufficiently large to include a landscape buffer if necessary, depending on the layout of the sport and recreational uses.
222. The sui generis employment uses, and those in Use Class E(g)(ii and iii) proposed on IP150c, would be sited adjacent to existing commercial uses on Nacton Road, to the south of Thrashers roundabout and would provide an appropriate extension to this commercial area. Furthermore, we are satisfied that the development of sui generis employment uses and those within Use Classes B2, B8 and E(g)(ii and iii) on IP152, along with the provision of a Park and Ride site would be suitable and could be accommodated on this large site, which is easily accessible to the A14 immediately to the south via junction 57 to the east.
223. In respect of concerns raised about the highway capacity in the Ravenswood area, SCC put forward options⁸⁰ for managing the impact of the proposed growth at these and the allocated site at Ravenswood U, V, W (IP150a). These include improvements to Thrashers

⁷⁷ Core Document I26

⁷⁸ Core Document I26.1

⁷⁹ Core Document K6

⁸⁰ Ravenswood Capacity Management Options (Core Document K11), dated December 2020

roundabout, moving the bus gate to split traffic movements between Thrashers roundabout and Maryon Road, and local restrictions to manage traffic flows and provide bus priority movement through the area. Based on this evidence, we are satisfied that traffic generated by the proposed development of these sites, could be safely accommodated on the local highway network.

224. Accordingly, we consider that the allocation of these sites is justified and that, subject to the above MMs, they will come forward through a masterplan approach to create an appropriate extension, which will integrate with the existing Ravenswood neighbourhood.

Felixstowe Road (IP010a and IP010b)

225. These two adjoining sites are allocated in Policy SP2 for part residential development, with 25% of IP010a allocated in Policy SP7 for an extension to Rose Hill primary school, and approximately 50% of IP010b retained for existing employment uses. However, the Site Sheet for IP010b in Appendix 3 to the SAP, earmarks only 40% of the site for retained employment uses, with a different dwelling capacity to that stated in Policy SP2. Both Site Sheets include a requirement for land to be reserved on 'either IP010a or IP010b' to facilitate the development of a cycle and pedestrian bridge to link the District Centre to the south with housing to the north of the railway line. In addition, it became apparent at the Hearing, from evidence provided by SCC, that insufficient land is reserved in the allocation of IP010a for the extension to the primary school required to support the proposed housing growth set out in the local plan. The allocation of 25% of the site area amounts to 0.55ha, whereas the LEA maintains that 0.8ha would be required for the school extension, based on the space requirements in Building Bulletin 103.
226. The inconsistencies between the requirements for IP010b in Policy SP2 and the Site Sheet, and the lack of clarity as to which site will be required to reserve land for the bridge link, render these two allocations ambiguous. It would, therefore, be unclear how a decision maker should react to development proposals for the sites. The shortfall in the provision of land for school expansion on site IP010a means the Plan is not positively prepared in meeting education needs. It is also evident that the two sites are interdependent in respect of their future access and infrastructure requirements.
227. Therefore, for clarity and effectiveness, changes are required to delete the separate allocations and Site Sheets, and bring the two sites together under a single New Policy, with appropriate supporting text **[MM201 and MM202]**. The new policy would allocate them as a single site for mixed residential and employment uses, with an indicative capacity for 137 dwellings on approximately 60% of the site,

and 0.8 ha of land for the expansion of the primary school, as specified by SCC. A single set of criteria will ensure matters such as the reservation of land for the bridge link, maintaining access to the existing commercial units to be retained and the design and layout of residential development can be effectively planned for in a comprehensive manner. Changes to the Policies Map are also required to geographically illustrate the single site allocation.

228. Whilst the two sites are in separate ownerships and a phased delivery of development may, therefore, be appropriate, this can be dealt with by means of a condition or planning obligation as part of any application for the site. It is not necessary for this to be included in the policy. The New Policy requires Section 106 contributions for a range of mitigations. Whilst it does not ensure the scale of any Section 106 contributions would be subject to their viability, Policy CS17 of the CSP makes this clear for all Section 106 Agreements. Nevertheless, for clarity and effectiveness, we have added words to criterion o of the New Policy to make this clear **[MM201]**.

Land Opposite 674-734 Bramford Road (IP029)

229. This site is allocated for employment uses in Policy SP5, public open space in Policy SP6 and a link road through the site, joining Europa Way and Bramford Road in Policy SP9. In order for the SAP to be clear and effective, this site should be allocated for this mix of uses in a single New Policy with appropriate supporting text **[MM203, MM204]**.

King George V Playing Field, Old Norwich Road (IP032)

230. This site is allocated for residential development (99 dwellings) in Policy SP2 and public open space in Policy SP6. In order for the SAP to be clear and effective, this site should be allocated for this mix of uses in a single New Policy with appropriate supporting text **[MM205, MM206]**. From the evidence before us, we are satisfied that this site would be developable and that the anticipated development of housing on it in years 10 to 12 on the new trajectory **[MM159]** is justified.

Land at Bramford Road, (Stocks Site) (IP033)

231. This site is allocated for residential development (55 dwellings) in Policy SP2 and public open space in Policy SP6. In order for the SAP to be clear and effective, this site should be allocated for this mix of uses in a single New Policy with appropriate supporting text **[MM207, MM208]**. From the evidence before us, we are satisfied that this site would be developable and that the anticipated development of housing on it in years 7 and 8 on the new trajectory **[MM159]** is justified.

Former School Site, Lavenham Road (IP061)

232. This site is allocated for residential development of 23 dwellings on 60% of the site, in Policy SP2, and open space on the remaining 40%, in Policy SP6. However, in order for the SAP to be clear and effective, this site should be allocated for this mix of uses in a single New Policy with appropriate supporting text to set out the development constraints **[MM209 and MM210]**.

233. With regard to the timescale for the housing delivery on the site, the Council's evidence to the Hearing⁸¹, estimates construction of the first homes in 2024/25. However, the evidence also states that before placing the site on the market, SCC, as the landowner, will review whether it is required for additional social care accommodation, with a planning application expected within 2 years. The Council's housing delivery evidence shows an average lead in time of 25 months from the submission of an application to the first dwelling completion on site⁸². If an application is not submitted until April 2023, which is two years from the start of the 5 year period in the trajectory, completions may not commence until 2025/26. As a greenfield site, the land is otherwise relatively unconstrained. Based on the evidence, we consider there is a realistic prospect that half of the dwellings will be delivered on site, within the first 5 years of the trajectory. However, to ensure the 5 year housing land supply is justified, a change is required as part of the new trajectory **[MM159]** to shift delivery to 2025/26 and 2026/27, which would see the second half of the site completed in year 6.

Housing Land Supply

234. Policy CS7 sets out the amount of new housing required and identifies what the housing land supply for the Plan period will consist of. This includes the number of dwellings completed since the start of the Plan period (223) and those under construction, with planning permission or with a resolution to grant planning permission subject to the signing of a Section 106 Agreement (1,687). The figures included in Policy CS7 reflected the position on 1 April 2019. However, in order to be effective, these figures should be updated to reflect the position on 1 April 2020, just prior to submission, which is: 644 dwellings completed since the start of the Plan period and 3,205 dwellings under construction, with planning permission or with a resolution to grant planning permission, subject to a Section 106 Agreement **[MM36]**.

235. Furthermore, following a discussion at the Hearing on care home places, the Council has provided evidence⁸³ for the contribution of care home

⁸¹ Matter 3 Housing Supplementary Evidence - Core Document K6

⁸² Table 7 of Core Document K6

⁸³ Core Document K20

places to housing land supply. This supports the application of a ratio of 1 additional dwelling for every 1.8 new care home places. As such, where care home places are identified within the housing land supply, we have applied this assumption, which is reflected in the changes to Policy CS7 for effectiveness. In addition, the land to be allocated within the Borough for residential development also needs to be amended in Policy CS7, from 6,100 to 4,431 dwellings, to reflect the above changes and the updated position in respect of each of the allocated sites set out elsewhere in this Report, in order to be effective **[MM36]**.

236. We consider that there is compelling evidence to support the inclusion of a windfall allowance as part of the anticipated supply over the Plan period, in accordance with paragraph 71 of the NPPF, having regard to the SHLAA, historic windfall delivery rates⁸⁴ and expected future trends. However, given the anticipated date of adoption of the Plan, along with the amended base date of 1 April 2021 for the 5-year housing land supply calculation set out below, this windfall allowance should commence in 2023 rather than 2022 to avoid double counting, thereby reducing the overall anticipated windfall dwellings to 650 over the Plan period. A change is required to Policy CS7 in this regard so that it is justified and effective **[MM36]**.

237. Following the assessment of each of the allocated sites as part of the Examination, changes are required to the number of dwellings on several of the allocated sites. This is for various reasons, including the completion of parts of the development, the granting of planning permission or a resolution to grant planning permission subject to the signing of a Section 106 Agreement, and changes to the anticipated delivery and/or the capacity of the allocation. These changes are set out elsewhere in the Report in respect of individual allocations. However, changes are required to the overall housing supply figures set out in Policy CS7 for effectiveness **[MM36]**. We have made a minor amendment to the wording of Policy CS7 in **MM36**, as it was subject to public consultation, to reflect the changes made to structure of the Plan, which mean that housing allocations are now contained within several policies in the SAP and AAP, and not just Policy SP2.

238. Policy CS7 states that in order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement. This would require a housing land supply of 9,108 dwellings rather than the 8,871 dwellings (7%) set out in the new housing trajectory. Nevertheless, we consider that there are likely to be further windfall opportunities for residential development, not included within the supply, for the following reasons.

⁸⁴ In Tables 2 and 3 of Core Document K6

239. The allowance for windfall supply in the housing trajectory, of 50dpa from 2023 to the end of the Plan period, is equivalent to the average windfall completions from small sites (of less than 10 dwellings) over the last 10 years of 52dpa⁸⁵. But the average windfall over the last 10 years has been 109dpa, which includes a further 57dpa delivered on large windfall sites (10 dwellings or more)⁸⁶. We conclude in the next section of the Report that further large windfall sites would be unlikely to come forward in the first 5 years following adoption, as any large sites with a realistic prospect of delivering housing in this period would have been allocated in the Plan. However, given the track record of delivery from windfalls in Ipswich, it is likely that further windfall housing will come forward in years 6-15 of the Plan period, over and above the 50dpa windfall allowance, particularly on large sites which are not identified in the Plan. This is especially so within the IP-One area, where further opportunities for residential development are likely in and around the town centre, with increasing levels of vacant commercial floorspace and the resulting opportunities for redevelopment. This additional windfall supply would add to the contingency of 7% included in the housing supply, and would boost delivery in Ipswich in accordance with national policy. As such, we do not consider any further change to Policy CS7 is necessary in this regard.
240. Following on from the changes required to Policy CS7 set out above, corresponding changes are required to Table 3: Housing Land Supply and Minimum Requirement as at 1 April 2019 and Table 4: Estimated Housing Delivery for 2019-2036 Excluding Current Permissions as at 1 April 2019 to bring them up to date and to ensure that they are justified and effective **[MM35, MM40]**.
241. The submitted Plan does not include a trajectory in any of its strategic policies illustrating the expected rate of housing delivery over the Plan period, as required by paragraph 74 of the NPPF. As set out elsewhere in this Report, we consider that the anticipated rate of housing delivery in the new housing trajectory is justified and that it is required in order for the Plan to be effective and consistent with national policy **[MM159]**. Reference to it should also be included in the supporting text to Policy CS7 **[MM38]**, along with a New Diagram indicating the projected completions per annum over the Plan period **[MM39]**.
242. Subject to the MMs set out above and within the section of the Report below, which considers the IP-One AAP, we are satisfied that the Plan would include sufficient developable allocations, along with other sources of supply, to meet the housing requirement over the Plan period.

⁸⁵ Based on the data in Table 3 of Core Document K6

⁸⁶ Table 3 of Core Document K6

Five Year Housing Land Supply

243. The housing requirement (as amended) for the Plan period (2018-2036) is 8,280 dwellings. The number of dwellings completed in the first three years is 971⁸⁷, against a requirement of 900 dwellings (at 300dpa). This results in a surplus of 71 dwellings since the base date of the Plan.
244. The PPG⁸⁸ states that 'where areas deliver more completions than required, the additional supply can be used to offset any shortfalls against requirements from previous years'. The PPG⁸⁹ also indicates that any shortfall in the period between the base date of the Plan and the date of adoption should be added to the Plan requirement for the next 5 years, unless a case can be made to apply it over a longer period. However, the PPG is silent on whether or not over delivery since the base date of the Plan can be used to proportionately reduce the subsequent housing requirement over the rest of the Plan period or over a shorter period, for example to reduce the 5-year requirement.
245. In this case, given the need to use a stepped trajectory due to the delivery of a significant amount of housing on the strategic sites at IGS and HDL later in the Plan period, we consider that it would be appropriate to reduce the 5-year requirement by the surplus of 71 dwellings. As such, the requirement for 1 April 2021 to 31 March 2026 would be 2,291 dwellings, which equates to an annual requirement of 458 dwellings⁹⁰. The new trajectory **[MM159]** which sets out the anticipated completions on the allocated sites, sites with planning permission, sites with fewer than 5 dwellings and windfall sites, indicates that the total supply for this period would be 2,346 dwellings⁹¹. This would equate to a housing land supply of around 5.12 years on 1 April 2021⁹². On this basis, we are satisfied that there is a realistic prospect that the Council will be able to demonstrate a 5-year supply of deliverable housing land on adoption.
246. Several suggestions were put forward at the Hearing by the Council and Representors as ways of improving the 5-year housing land supply position. Firstly, we acknowledge that the average windfall provision over the last ten years has been 109dpa, including both large and small

⁸⁷ 223 dwellings between 1 April 2018 to 31 March 2019; 421 dwellings between 1 April 2019 to 31 March 2020; and 327 dwellings between 1 April 2020 to 31 March 2021 as set out in Core Document K20

⁸⁸ PPG Reference ID: 68-032-20190722

⁸⁹ PPG Reference ID: 68-031-20190722

⁹⁰ $(300\text{dpa} \times 3) + 540\text{dpa} \times 2 - 71 + 20\% \text{ buffer} (382 \text{ dwellings}) = 2,291/5 = 458.2$

⁹¹ 1 April 2021 to 31 March 2022 (Year 1) – 204 dwellings, 1 April 2022 to 31 March 2023 (Year 2) – 339 dwellings, 1 April 2023 to 31 March 2024 (Year 3 – 605 dwellings), 1 April 2024 to 31 March 2025 (Year 4) – 644 dwellings and 1 April 2025 to 31 March 2026 (Year 5) – 554 dwellings

⁹² $2,346 \text{ divided by } 458.2 = 5.12$

sites⁹³, whereas the windfall allowance included in Policy CS7 is only 50dpa, which is equivalent to the rate of delivery from small windfall sites alone over the last ten years. However, it would be reasonable to assume that any large sites (of 10 or more dwellings) with a realistic prospect of delivering housing in the first 5 years following the adoption of the Plan will have been identified and allocated in the submitted Plan. As such, whilst the windfall allowance in Policy CS7 can be justified on the basis of the past trend for small windfalls alone, further large windfall sites are unlikely to materialise in the first 5 years following adoption. Therefore, we do not consider that an increase in the windfall allowance is justified for the first 5 years following adoption.

247. Secondly, it was put to us that identifying further sites for housing would help to boost the 5 year housing land supply position. Although there may be other greenfield sites on the edge of the Borough which could be allocated, any such site would be unlikely to meet the definition of deliverable set out in the Framework. Also, as concluded above, we are satisfied that sufficient developable land has been allocated for housing within the submitted Plan to meet the requirement over the Plan period, so there is no need to allocate further sites to meet the requirement in years 6-15 of the Plan period. Furthermore, any delay to the adoption of the Plan, to allow the identification of and consultation on further housing site allocations, would not assist the Council in bringing forward the sites already allocated in the Plan for development.

248. Finally, further reducing the housing requirement in the first five years of the Plan period by altering the stepped requirement would not be consistent with the Government's objective of significantly boosting the supply of homes.

249. Although the 5 year housing land supply would be marginal, we do not consider that the options put forward to improve this position would be justified, effective or consistent with national policy.

Conclusion

250. Therefore, subject to the MMs set out above, we conclude that the proposed housing allocations are justified, taking into account the reasonable alternatives, positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development.

⁹³ Table 3 of Core Document K6

Issue 4 – Has the Plan been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for employment and business needs for the period 2018-2036, including the allocation of sites to meet these needs?

Employment Land Need and Supply

251. Ipswich plays a key role in the economy of the ISPA, serving as an employment centre for the wider area and helping to drive the economic growth and productivity of the sub-region. As such, the ISPA operates as a FEA, comprising a number of distinct economic geographies, including the wider Ipswich market area, Felixstowe and the A14 corridor, and the surrounding rural and agricultural economy.
252. Policies ISPA1 and CS13 make provision for the allocation of a minimum requirement of 23.2 ha of employment land to meet the need for an additional 9,500 business and industrial jobs in Ipswich over the Plan period. This represents Ipswich's share of the total forecast jobs growth for the FEA and is justified by proportionate evidence set out in the Economy Topic Paper and Addendum⁹⁴. Policy SP5 in the SAP allocates sites totalling 28.34 ha of employment land to meet this requirement.
253. The requirement for, and supply of, employment land exceed the amount necessary to accommodate 9,500 jobs over the Plan period. However, the Council's evidence in the Topic Paper and the supporting Ipswich Economic Area Sector Needs Assessment (ESNA)⁹⁵ and the Ipswich Economic Area Employment Land Supply Assessment (ELSA)⁹⁶ explain the need for a surplus of employment land to provide a range and choice of sites to meet the needs of different potential employers and to enable Ipswich to fulfil its sub-regional economic growth role. This is consistent with the expectations of national policy for a strong and competitive economy, in paragraphs 82 and 83 of the NPPF and is justified.
254. However, this is not adequately explained in the supporting text to Policies ISPA1, CS13 and SP5. Therefore, **MM11**, **MM59** and **MM183** are necessary to ensure the Plan is justified in respect of its need for, and supply of, employment land.

⁹⁴ Core Documents D55 and I5

⁹⁵ Core Document D2

⁹⁶ Core Document D1

Land Allocated for Employment Uses in Policy SP5

255. The approach to site allocations within the SAP and the need for changes to the structure of the DPD for soundness is discussed above under main issue 3, in relation to policies for housing allocations. The changes include placing site allocations that are within and outside of the IP-One area into separate policies, bringing together allocations for different uses on the same sites into a series of Mixed Use policies, and incorporating the development constraints currently in the Site Sheets in Appendix 3, into the site allocation policies. For clarity and effectiveness, the same changes are required to the employment allocations in Policy SP5.
256. Twelve sites are allocated for employment uses in Policy SP5. Sites IP004, IP029, IP043, IP051, IP094, IP119, IP132, IP150c and IP152 all form part of larger sites allocated for a mix of uses or are located within the IP-One area. Accordingly, in line with the changes described above, these are deleted from Policy SP5 **[MM182]** and included in New Policies allocating sites for a mix of uses **[MM199, MM203, MM268]** and a New Policy allocating sites for employment uses within the IP-One area **[MM274]**. The development constraints and issues from the relevant Site Sheets in Appendix 3 are also deleted and included in a revised form within the New Policies and their supporting text.
257. The remaining site allocations for employment uses outside of the IP-One area (IP067b, IP140 and IP141a) should be retained in Policy SP5 and the development constraints and issues from the Site Sheets in Appendix 3 included in the policy **[MM182]**. Amendments to the supporting text to Policy SP5 are also necessary to delete reference to the Site Sheets **[MM184, MM185]** and to include additional guidance on site specific constraints **[MM186]**. All of these MMs are necessary to ensure that the requirements for applications on the employment land allocations are clear and effective. Consequential changes are necessary to the geographical representation of these allocations on the Policies Map.

Changes to the Use Classes Order

258. Under the changes to the Town and Country Planning (Use Classes) Order 1987 (the UCO), which came into effect on 1 September 2020, Class B1 Business uses now fall within the new Commercial, Business and Service Use Class E along with the former A1, A2, A3 and parts of D1 and D2 Use Classes, allowing changes between these uses without the need for planning permission. Class B2 General Industrial and Class B8 Storage or Distribution remain as separate Use Classes.

259. Accordingly, changes to policies and supporting text throughout the Plan are necessary to reflect the new Use Class E, to ensure the Plan is consistent with national policy. These include Policies CS13, DM31, DM33 and SP5 and their supporting text, the New Policies for sites including employment uses, and the definition of the UCO in the glossary at Appendix 5 to the CSP [**MM10, MM57, MM58, MM60, MM61, MM101, MM109, MM126, MM131, MM157, MM182, MM185, MM199, MM203, MM268, MM274**].

Protection of Employment Land

260. Policy DM33 seeks to safeguard existing Employment Areas, as designated on the Policies Map, for employment and ancillary uses. This is justified to maintain the existing supply of employment land and jobs required to support the economy of Ipswich and the wider sub-region.

261. The policy permits a wider range of small scale services where these are necessary to support businesses within an Employment Area, and the change of use or redevelopment of employment land to other uses outside of Employment Areas, but only where there is no reasonable prospect of the site or building being re-used for employment purposes over the Plan period. To demonstrate 'no reasonable prospect' exists, the supporting text at paragraph 9.33.4 requires evidence that the site has been marketed for employment purposes for at least 12 months, with further detail of what is required set out in Appendix 6.

262. Paragraph 122 of the NPPF continues to apply the 'no reasonable prospect' test in considering the alternative use of allocated sites. However, the factors to be taken into account in assessing whether there is a realistic prospect of an allocated site being developed for its intended use, set out in the PPG⁹⁷, are broader than the requirement to produce evidence of the active marketing of a site. They also include the length of time the site has been allocated in the development plan, its planning history, any changes in circumstances and whether there is an unmet need for the alternative use proposed.

263. Therefore, for effectiveness and so that it is adequately justified, Policy DM33 and its supporting text require modification to reflect the criteria in the PPG [**MM131, MM132, MM133, MM134, MM135**]. For clarity and effectiveness, further detail is also necessary in Appendix 6 to ensure the type and level of marketing required is proportionate to the property being marketed [**MM158**].

264. As a result of the recent changes to the UCO, there is a risk that business floorspace within designated Employment Areas could change to other

⁹⁷ Paragraph: 001 Reference ID: 66-001-20190722

non-employment uses within Use Class E, without the need for planning permission. This could undermine the supply of employment land in Ipswich. Therefore, so that the Plan is effective in protecting employment land, a change to Policy DM33 and its supporting text is justified to make clear that conditions may be imposed on planning permissions to remove permitted development rights in these circumstances, but only where this is consistent with national policy on the use of conditions, in terms of the tests of reasonableness and necessity [MM131, MM132].

Conclusion

265. Subject to the MMs set out above, we conclude that the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its provision for employment and business needs for the period 2018-2036, including the allocation of sites to meet these needs.

Issue 5 – Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its strategy and policies for retail and other town centre development in Ipswich for the period 2018-2036?

Retail Floorspace Need and Supply

266. Paragraph 86d) of the NPPF expects plans to allocate sites in town centres to meet the scale and type of development needed, looking at least 10 years ahead. The Retail Position Update Statement (2019)⁹⁸, identifies a need for 9,900 square metres (sqm) of comparison retail floorspace to 2029, 14,300sqm to 2031 and 26,500sqm to 2036. In terms of convenience retail floorspace needs, the report demonstrates that forecast requirements to 2029 will be satisfied by existing commitments and planning permissions, with an additional need of 100sqm to 2031 and 1,500sqm to 2036. The remaining convenience floorspace needs to 2036 will be met by the new District Centre at IGS allocated in Policy CS10.

267. Policy CS14 seeks to provide for 10,000sqm of comparison retail floorspace, looking 10 years ahead to 2031, with a focus on allocating suitable sites in the town centre. Policy SP10 allocates a number of sites within the Central Shopping Area for additional comparison retail development, which together with provision of around 1,220sqm at the IGS in Policy CS10, would deliver around 10,550sqm of comparison retail floorspace over the next 10 years. This would comfortably meet the need for the 10 year interval to 2029.

⁹⁸ Table 3.2 of Core Document D7

268. With regard to the additional forecast need to 2031 and beyond to 2036, the Council's evidence⁹⁹ shows that there has been significant contraction in the retail sector in Ipswich since 2019, with a number of shops having closed during the Covid-19 pandemic. The Council's response to the shrinkage of the retail market, in the meantime, is to seek to permit a greater range of uses in centres through development management policies for the Central Shopping Area (Policy DM27) and District and Local Centres (Policy DM30). Therefore, it would be premature for the Plan to seek to make provision for the full 14,300sqm of comparison retail floorspace at this point in time. It is likely that some re-evaluation of the strategy for the town centre will be necessary post-pandemic, which all the signs indicate may reduce the forecast need for retail floorspace in Ipswich. However, this should be addressed in a future review of the Plan.
269. On this basis, we are satisfied that the Plan makes adequate provision for the convenience and comparison retail needs of the Borough. Accordingly, the Plan is positively prepared, justified and consistent with national policy in respect of its provision for retail floorspace. For clarity and effectiveness, a number of small, but material wording changes to Policy CS14 and its supporting text are necessary **[MM62, MM63]**.
270. In line with the changes to the structure of the SAP and the AAP discussed elsewhere in the Report, which are necessary for the clarity and effectiveness of this part of the Plan, a New Policy and supporting text are required for the retail site allocation outside of the IP-One area at Boss Hall Road, forming part of Sproughton Road District Centre **[MM180, MM181, MM221]**. For clarity and effectiveness, an amendment to the Key Diagram is also necessary to show this is a proposed District Centre rather than an existing one **[MM7]**.

Changes to the Use Classes Order

271. The changes to the UCO described above also incorporated the former Class A1 Retail, Class A2 Financial and Professional Services, Class A3 Restaurants and Cafes, Class D2 Gymnasiums and some non-residential uses in Class D1, into the new Commercial, Business and Service Use Class E. Uses such as A4 Drinking Establishments and A5 Takeaways now form 'sui generis' uses of their own type.
272. Policies DM27 and DM30 establish the range of uses acceptable within primary and secondary shopping frontages in the Central Shopping Area of Ipswich and District and Local Centres. Changes are required to these two policies and their supporting text to ensure consistency with national policy, in respect of the revised Use Classes and the definition

⁹⁹ At Appendix 18 of Core Document K24

of town centre uses in the revised NPPF, and to allow for the intended flexibility in the range of uses permitted in the new Use Class E, so that businesses are able to adapt and diversify to meet changing demands on the high street **[MM110, MM111, MM112, MM113, MM114, MM115, MM116, MM117, MM118, MM220, MM121, MM122, MM123, MM124, MM125, MM127]**.

273. For consistency with national policy, amendments to Policy SP10 and its supporting text are also necessary to reflect changes to the UCO **[MM217]**. As with employment land, there is a risk that new retail floorspace provided on sites allocated in Policy SP10 could change to other uses within Use Class E, without the need for planning permission. This could undermine the supply of retail floorspace necessary to maintain the vitality and viability of the town centre and to meet the forecast growth in expenditure to the end of the Plan period. So that the Plan is effective in protecting the supply of retail floorspace, a change to the supporting text of Policy SP10 is justified to make clear that conditions may be imposed on planning permissions for new retail floorspace to remove permitted development rights in these circumstances, where this is consistent with national policy on the use of conditions **[MM218]**.

Retail Proposals Outside Defined Centres

274. In order to ensure the vitality and viability of existing centres, Policy DM32 seeks to control the scale of retail proposals in locations outside of the Defined Centres. It does so by, amongst other things, requiring proposals for more than 200sqm to satisfy the sequential test and avoid an adverse impact on existing Defined Centres.
275. However, paragraph 87 of the NPPF does not set a threshold for the application of the sequential test to proposals for main town centre uses outside of town centres, except for small scale rural development. Paragraph 90 of the NPPF permits a local threshold to be set for impact assessments and, based on the evidence in the Retail and Commercial Leisure Study (2017)¹⁰⁰, a threshold of 200sqm is justified for this.
276. Accordingly, to ensure Policy DM32 is consistent with national policy, justified and effective, changes are required to the policy and its supporting text to ensure the threshold of 200sqm only applies to impact tests and to make clear that the sequential test, as defined in the revised NPPF, does not apply to small scale rural proposals **[MM128, MM130]**. Associated changes are necessary to the supporting text to Policy DM32 and to ensure references to Use Classes are consistent with the changes to the UCO **[MM129]**.

¹⁰⁰ Core document D8, paragraph 12.3.10

Central Shopping Area

277. The supporting text to Policy DM27 sets out a series of measures to enhance the vitality and viability of the Central Shopping Area, including environmental improvements. The improvements to the Cornhill have now been completed and, for clarity and effectiveness, reference to them as a future priority for the Plan period should be deleted **[MM119]**.

Conclusion

278. Subject to the MMs set out above, we conclude that the Plan has been positively prepared and is justified, effective and consistent with national policy in respect of its strategy and policies for retail and other town centre development in Ipswich for the period 2018-2036.

Issue 6 – Are the proposed allocations for open space, leisure uses, community facilities and transport infrastructure justified taking into account the reasonable alternatives, positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?

Land Allocated for Open Space and Leisure Uses or Community Facilities in Policies SP6 and SP7

279. Policy SP6 in the SAP allocates sites for open space and seeks to protect existing open spaces shown on the Policies Map, by reference to Policy DM5 in the CSP. However, given that the open spaces allocated in Policy SP6 form part of mixed use developments, which as explained above, are each subject to their own New Policy, and Policy DM5 provides the necessary local policy protection for existing open spaces, Policy SP6 is no longer justified. Therefore, to avoid duplication, Policy SP6 should be deleted along with its supporting text **[MM187, MM188, MM189]**. For clarity and effectiveness, Policy DM5 requires amendment to specify the types of open space, sports and recreation facilities that it seeks to protect and to refer to their geographic representation on the Policies Map **[MM83]**.

280. Policy SP7 allocates sites for leisure uses or community facilities. However, many of these allocations form part of mixed use developments which, as explained elsewhere in this Report, we consider should each have their own New Policy. As a consequence they should be removed from Policy SP7, and amendments made to the supporting text, for effectiveness. Furthermore, for clarity and effectiveness, more details relating to the constraints and requirements for the development of the

remaining allocation at IP129 (BT Depot, Woodbridge Road) should be set out in Policy SP7 and its supporting text **[MM190, MM191, MM192]**.

281. In respect of the Plan's objective for community facilities and infrastructure, set out in Objective 10 of the Core Strategy and the SAP, amendments are required to its wording for consistency and to ensure that the Plan is effective **[MM3, MM166]**.

Land Allocated for an Extension to Orwell Country Park in Policy SP8

282. Land is allocated at Pond Hall Carr and Farm (IP149) in Policy SP8 as an extension to Orwell Country Park. However, the policy does not include any criteria against which to assess proposals for the extension. In order to be effective, Policy SP8 should be amended to include appropriate criteria **[MM193]**.

Land Safeguarded for Transport Infrastructure in Policy SP9

283. Policy SP9 of the submitted Plan safeguards land for transport infrastructure. We have concluded elsewhere in this Report that the land for transport infrastructure allocated in Policy SP9 forms part of mixed use developments, which should each have their own New Policy. Therefore, in order for the Plan to be effective, along with the proposed New Policy in respect of Sustainable Transport Infrastructure set out below, which includes the park and ride site at Anglia Parkway, Policy SP9 is no longer justified and should be deleted along with its supporting text **[MM194, MM195]**.
284. In order to be consistent with national policy, the submitted Plan should seek to promote sustainable transport including opportunities for walking and cycling. As such, a New Policy and supporting text is required to support sustainable travel infrastructure improvements outside the IP-One area in the SAP through safeguarding sites/routes where necessary, new developments and/or seeking funding opportunities; requiring new development to improve linkages to the public rights of way network; and supporting pedestrian and cycling measures. In addition, the safeguarding of a park and ride site (included in Policy SP9 in the submitted Plan) should be included in this New Policy for effectiveness **[MM196, MM197]**.

Conclusion

285. Subject to the MMs set out above, we conclude that the proposed allocations for open space, leisure uses, community facilities and transport infrastructure are justified taking into account the reasonable alternatives, positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development.

Issue 7 – Whether the AAP for the IP-One Area is sound, in terms of whether the policies and proposals are positively prepared, justified, effective and consistent with national policy?

Strategy for the IP-One Area

286. The IP-One area covers a large part of central Ipswich. The SAP incorporates the IP-One AAP, however, as submitted, the AAP lacks coherence and a clear statement of the spatial strategy for the IP-One area. In order to be positively prepared, justified, effective and consistent with national policy the AAP should be clearly distinguishable from the SAP and should set out its purpose and strategy. Amendments are therefore required to the introductory supporting text to set this out **[MM211, MM212, MM213]**.
287. The policies for the AAP are dispersed within the SAP and allocations for housing, employment, retail and other uses included within policies throughout the SAP, alongside allocations outside the AAP. Furthermore, the IP-One Opportunity Areas are not subject to policy but appear as guidance within the SAP. Changes to the SAP are, therefore, required to ensure that the AAP is distinguishable from the remainder of the SAP, and that its policies and proposals are clearly defined and in one location in order that it is effective and provides a clear vision for the central area of Ipswich. These changes are discussed throughout this Report. A change to the introduction to the SAP setting out the structure of the SAP is required for effectiveness **[MM163]**. The CSP should also be amended to make it clear that the AAP has been prepared, is being implemented and is incorporated within the SAP **[MM29]**.
288. The SAP, as submitted, refers to four Quarters and eight Opportunity Areas within the IP-One area. For clarity and effectiveness, a plan showing these areas and their inter-relationships should be added to the introductory section of the AAP **[MM214]**.

IP-One Quarters

289. The IP-One Quarters set out in the AAP are the medieval Town Centre, Waterfront, Education Quarter and Portman Quarter. In respect of the Town Centre, in order that the AAP is effective, it is necessary to update and amend Policy SP10 to ensure that it relates specifically to retail site allocations within the IP-One area **[MM217]**. Furthermore, corresponding changes, along with a reference to the Retail and Leisure Study (2017), are required to the introductory text to the AAP for effectiveness **[MM215]**.

290. The Waterfront and Portman Quarters are the subject of Policies SP11 and SP13 respectively. In order that these policies are effective, changes are required to ensure it is clear that any proposal coming forward within these Quarters would also be subject to relevant development management and other policies as appropriate within the CSP and SAP **[MM222, MM224]**.

291. Policy SP12 relates predominantly to the Education Quarter. However, there are places where this Quarter overlaps with the Waterfront. In order that the Plan is positively prepared and effective, changes are required to Policy SP12 to ensure that: waterfront uses are positively considered within the Education Quarter and the Waterfront; and that the extent of the site allocated for education/waterfront uses, with an element of public car parking, at No. 8 Shed Orwell Quay (IP049) is included within the policy, given the proposed deletion of the Site Sheets in Appendix 3 **[MM223]**.

IP-One Opportunity Areas

292. The SAP identifies eight Opportunity Areas within the IP-One area: the Island Site; Merchant Quarter; Mint Quarter and surrounding area; Education Quarter and surrounding area; Westgate; River and Princes Street Corridor; Upper Orwell River and Canalside; and Holywells Area. These are located within a separate chapter in the submitted Plan. Given that the Opportunity Areas are within the IP-One area, this chapter should be included within the AAP, in order for it to be effective. Furthermore, changes are required to the introduction to this section of the AAP setting out the vision for the Opportunity Areas, in order that the Plan is effective **[MM225]**.

293. The Plan, as submitted, includes 'guidance' for development within the Opportunity Areas in Chapter 6, which incorporates diagrams illustrating the site analysis and development options and a table setting out the development opportunities and principles for each. The NPPF says that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Chapter 6 contains no specific policies for the eight Opportunity Areas. In order to be consistent with national policy and to be effective, therefore, changes are required to this element of the SAP to include a policy and supporting text, along with amended Site Analysis and Development Options plans, for each Opportunity Area and for these to be clearly placed within the AAP. These would replace the 'guidance' for each Opportunity Area, which includes a table setting out the development opportunities and principles. This would help guide development and assist decision makers and developers alike in understanding what is required of development proposals within

the Opportunity Areas **[MM229, MM230, MM231, MM232, MM233, MM234, MM235, MM236, MM237, MM238, MM239, MM240, MM241, MM242, MM243, MM244, MM245, MM246, MM247, MM248, MM249, MM250, MM251, MM252, MM253, MM254, MM255, MM256, MM257, MM258, MM259, MM260]**.

294. A consequential change is required to the supporting text to Policy CS3 to reflect the inclusion of new policies relating to the Opportunity Areas in the AAP in order for the Plan to be effective **[MM30]**. Furthermore, as these new policies set out the need to take account of heritage assets, the introductory text to the IP-One area, in relation to the historic environment in these Opportunity Areas, should be deleted as it is not justified **[MM216]**.
295. As this section of the AAP will now contain policies rather than 'guidance' relating to development proposals within the Opportunity Areas, changes are required to the introductory section to explain how these policies should be read and how they relate to policies in the SAP and CSP in order for the Plan to be effective **[MM226, MM228]**. Furthermore, following the discussion at the Hearing, minor changes are required to the names of the Opportunity Areas for clarity and effectiveness **[MM226]**.
296. The SAP allocates a number of sites within the Opportunity Areas for residential and other uses. For clarity, these allocated sites should be identified on a Plan within the AAP to ensure that it is effective **[MM227]** and be included in policies within the AAP, as set out later on in this Report.

IP-One Area Specific Policies

297. The Plan, as submitted, includes Policy SP15 which seeks to support improvements to pedestrian and cycle routes within the IP-One area and throughout the Borough. In order for the AAP and SAP to be effective there is a need to split this policy into two in order that an amended Policy SP15 deals with this matter in the IP-One area and a new policy is included in the SAP, which relates to the remainder of the Borough. As such, that part of the submitted policy which refers to the Borough as a whole should be removed from Policy SP15 in order that the AAP is effective **[MM261]**.
298. Policy SP16 sets out the Council's aspiration for the provision of a new Wet Dock Crossing which would link the east and west banks of the river in central Ipswich, as well as facilitating access to the Island Site and potentially the provision of through traffic. In order for this policy to be effective, reference to the potential route being shown on the IP-One Area Inset Policies Map is required **[MM262]**.

299. The Town Centre car parking policy is set out in Policy SP17. In order to be justified, changes are required to this policy and its supporting text to reflect the findings of the parking study. This suggests a net increase of just three spaces by 2036. The policy as submitted includes three sites allocated for multi storey car parks and we consider that adding the Old Cattle Market, Portman Road (IP051) is justified, given that this is a possible element to be included on this mixed use site **[MM263]**. Nevertheless, it is apparent from the evidence presented at the Hearing that new, permanent parking provision made on these sites would replace existing temporary spaces in the Town Centre. The policy and supporting text therefore require amendment to say that there would be no net addition to long-stay car parking provision over the Plan period, in order for it to be effective **[MM263, MM264]**. Further amendments to the supporting text are also necessary to reflect the findings from the parking study and the approach to the use of sites for temporary car parks **[MM265, MM266, MM267]**.

Housing Allocations in the IP-One Area

300. As explained earlier in this Report, in order to be effective it is necessary that sites allocated for housing within the IP-One area are clearly identified in a New Policy within the AAP, which sets out the location of the sites to be allocated, the site size and capacity, a site plan and any constraints to development, along with relevant supporting text **[MM268, MM269]**. The deliverability and developability of some of these sites are considered further below.

Smart Street/Foundation Street (North) (IP011c)

301. This site is allocated for residential development in Policy SP2, with an estimated capacity for 7 dwellings, and a medium term delivery timescale. There is potential for archaeological remains of national significance on site, given that it is located within the Anglo-Saxon core of Ipswich.

302. Whilst this site has been allocated in an adopted plan for a number of years, part of the reason given for its non-development is that it was previously part of a single allocation with sites IP011a and IP011b, which themselves are constrained by buildings in active use and the presence of scheduled monuments. However, the three sites are now proposed as separate allocations in the SAP. Site IP011c is currently in use as a surface level car park, with a temporary permission expiring in April 2022, so could come forward independently of the other two once that expires. There are other residential properties on Smart Street and Foundation Street, so the site is in a suitable location for housing development.

303. The Council has been working with Historic England and the County Archaeologist in preparing the Plan. Neither object to this site being allocated for development, subject to necessary archaeological assessment and investigations.

304. From the evidence before us, therefore, we are satisfied that this site is developable and that its inclusion in the new trajectory **[MM159]**, with an anticipated delivery in 2028/29 (year 8), is justified. For effectiveness, it should be included as a separate allocation in the New Policy for Housing Sites in the IP-One Area, with a requirement for an archaeological assessment to be submitted with any application **[MM268]**. We have made a minor amendment to the wording of the MM that was subject to consultation, to remove an erroneous reference to the Star Lane frontage, given that the site fronts Smart Street and Foundation Street.

Peter's Ice Cream, Grimwade Street (IP012)

305. This site is allocated for 35 dwellings in Policy SP2, with a likely delivery timescale of the medium term. It has been allocated in an adopted Plan for a number of years, but has not yet come forward for residential development. At the Hearing, the Council explained the progress it has made since 2000 on the redevelopment of post-industrial sites, with a number of redevelopment schemes permitted and implemented in Central Ipswich. Although this was slowed considerably by the financial crisis of 2007-8, the Council stated that it still has a focus on regeneration in Ipswich. The redevelopment of this allocated site forms part of this regeneration strategy.

306. The site immediately to the north (IP386) is undergoing Council-led redevelopment, which would provide 16 flats, and this, along with other redevelopment in the immediate vicinity, makes this allocated site more attractive, and is evidence that residential development in this location is viable. The landowner has confirmed that the site is available for development and that the anticipated delivery date is reasonable.

307. From the evidence before us, we are therefore satisfied that this site is developable and should be included in the New Policy for Housing Sites in the IP-One Area for effectiveness **[MM268]**. Its anticipated delivery in year 6 on the new trajectory **[MM159]** is also justified.

Hope Church (IP014)

308. This allocated site is within the control of Handford Homes. In an addendum to the SoCG with Handford Homes¹⁰¹ included in the

¹⁰¹ Core Document I27

Councils' Matter 3 Housing Supplementary Evidence¹⁰², it is apparent that the Church is expected to vacate the site by Easter 2021 and that a programme is in place for the completion of the residential development of 25 dwellings by April 2023. From the evidence before us, we are satisfied that this site is deliverable and should be included in the New Policy for Housing Sites in the IP-One Area for effectiveness **[MM268]**, and that its anticipated completion in year 3 on the new trajectory **[MM159]** is justified.

Waterworks Street (IP089)

309. This site is allocated for residential development in Policy SP2, with an estimated capacity for 23 dwellings, and a long term likely delivery timescale. The site comprises privately owned car parks serving adjacent businesses, but it was confirmed the landowner supports its allocation. Also, there is new residential development to the rear of buildings on Star Lane to the east, suggesting a reasonable prospect of housing being developed on this site within the Plan period, given the temporary nature of uses on site.
310. The main constraint to its developability, which was discussed at the Hearing, is the potential for archaeological remains to be uncovered on site. However, it was confirmed that the site is on the edge of the town's Anglo-Saxon and Medieval core, so any remains are likely to be from a more recent historical period.
311. We are satisfied that this site is developable and that its inclusion in the new trajectory **[MM159]**, with an anticipated delivery in 2032/33 (year 12), is justified. However, for effectiveness, the allocation should be included in the New Policy for Housing Sites in the IP-One Area **[MM268]**, with a requirement for an archaeological assessment to be submitted with any application included as a development constraint.

Transco, south of Patteson Road (IP098)

312. This site is allocated in Policy SP2 for residential development, with an estimated capacity for 62 dwellings, at a high density of 110 dph. It is, however, a key site in the regeneration of the waterfront, located just to the east of Wet Dock, around which a number of high density, flatted schemes have already been successfully developed.
313. The main constraint to development of the site is the presence of a gas governor, with pipework above ground, including along the main Patteson Road frontage. Whilst the Council suggests that residential development could take place adjacent to the gas governor, it is likely

¹⁰² Core Document K6

that the pipes would need to be removed and relocated to deliver a viable housing scheme.

314. Nevertheless, the residential development to the north on the opposite side of Patteson Road was built on the site of a former gas works. Therefore, relocation of the gas governor infrastructure is a reasonable expectation for site remediation, particularly with the help of grant funding, which the Council has been able to secure for other sites in the IP-One area.
315. Delivery of site IP098 is not anticipated until 2030/31 and 2031/32 (years 10 and 11). On the basis of the evidence before us, we are satisfied that this site is developable and that its inclusion in the new trajectory **[MM159]**, for delivery in that timeframe, is justified. For effectiveness, site IP098 should also be included in the New Policy for Housing Sites in the IP-One Area **[MM268]**.

Land north of Former British Telecom Office, Bibb Way (IP279b(1) and IP279b(2))

316. These sites are allocated in Policy SP2 for residential development (18 dwellings on IP279b(1) and 29 dwellings on IP279b(2)), with a likely delivery timescale of the short term. The Councils' Five Year Housing Supply Delivery Table¹⁰³ confirms that these sites are owned by the Council and will be developed by the Council's arm's length development company, Ipswich Borough Assets Limited, alongside the neighbouring site (IP279a). All three sites have been the subject of pre-application discussions for the conversion of the office building to residential (IP279a) and the construction of new build dwellings (IP279b(1) and IP279b(2)). The developer will take a comprehensive approach to the development of these three sites. As a result, the capacity of IP279a has been reduced and the capacities of IP279b(1) and IP279b(2) have been increased to 35 and 37 dwellings respectively, but with very little impact on the overall number of dwellings proposed.
317. From the evidence before us, therefore, we are satisfied that these sites are deliverable and should be included in the New Policy for Housing Sites in the IP-One Area with amendments made to their capacity for effectiveness **[MM268]**. Their anticipated completion in year 3 on the new trajectory **[MM159]** is also justified.

Former Bridgeward Social Club, 68a Austin Street and land to the rear (IP309)

318. This site is allocated in Policy SP2 for housing for 15 dwellings, with a likely delivery timescale of the short term. The Councils' Five Year Housing Supply Delivery Table confirms that this site is in the control of

¹⁰³ Core Document K18

two developers, including the Council's own development company, and that a planning application is expected in 2021/22. A planning application on the southern portion of the site (Ref. 19/01143/FUL) was withdrawn due to access issues, but these are now capable of resolution through the use of an alternative access from the west side. The two landowners are working together on a joint planning application.

319. From the evidence before us, therefore, we are satisfied that this site is deliverable and should be included in the New Policy for Housing Sites in the IP-One Area **[MM268]**. Its anticipated completion in year 4 on the new trajectory **[MM159]** is also justified.

72 (Old Boatyard) Cullingham Road (IP354) and 77-79 Cullingham Road (IP355)

320. Sites IP354 and IP355 are allocated for residential development in Policy SP2, with indicative capacities for 24 and 6 dwellings respectively. They are located on opposite sides of Cullingham Road, which is a predominantly residential street. Whilst both sites are currently occupied by commercial and industrial buildings and uses, new housing has been successfully developed on other former commercial sites in the street and to the east on Handford Road. Moreover, the land to the east off Bibb Way is also allocated in the SAP for residential development. Therefore, the sites are in a suitable location for housing.

321. Policy SP2 anticipates their delivery within the first 5 years of the housing trajectory. However, neither site has planning permission and both are subject to flood risk, contaminated land and archaeological constraints. The main issue, therefore, is whether the sites can be considered to be deliverable, given their current planning status and the development constraints to be addressed.

322. With regard to the constraints, the SFRA¹⁰⁴ confirms that the majority of both sites is in Flood Zone 2, with a medium probability of fluvial flooding from the River Gipping and a residual risk of tidal flooding from the Orwell in the event of a failure of the flood defence infrastructure. However, the PPG¹⁰⁵ regards residential development as appropriate within Zone 2. In addition, the SFRA does not rule out residential development on either site, but recommends a series of measures to be incorporated into any developments to mitigate the risks of flooding.

323. This approach is consistent with national policy and we are satisfied that flood mitigation measures can be secured by condition on the grant of planning permission. Likewise, both land contamination and archaeological considerations and mitigation measures can be managed

¹⁰⁴ Core document I34, Table 8-1

¹⁰⁵ Paragraph: 066 Reference ID: 7-066-20140306

by condition. These requirements are included in the constraints criteria for both IP354 and IP355 in the New Policy for Housing Sites in the IP-One Area in **MM268**, which is necessary for these site allocations to be justified and effective.

324. The redevelopment of both sites would offer sustainability benefits to the surrounding properties, by replacing the existing industrial and storage operations with more compatible residential uses. The impacts of development on traffic, parking, wildlife and the amenities of adjoining properties are all matters which can be addressed through the planning application process.
325. Detailed planning applications have been submitted for residential development on both sites. For site IP354, the application is for 14 dwellings, rather than the estimated 24. Therefore, the capacity of the site needs to be reduced accordingly in the new trajectory and policy **[MM159, MM268]**, to ensure the allocation and its contribution to the housing land supply are justified based on the latest evidence.
326. The applications were submitted in December 2020 (IP354) and May 2021 (IP355), but as yet are undetermined. However, the applicant for The Old Boatyard site is a local house builder with a successful track record of delivering residential schemes within the central areas of Ipswich. Site IP355 was purchased by the current landowner for the purpose of pursuing residential development and the existing business is looking to relocate.
327. The average lead in time from approval to first completion is 25 months in Ipswich¹⁰⁶. Subject to permission being granted and conditions discharged within the next 12 months, there is a realistic prospect that housing will be delivered on both sites by 2025/26 (year 5). On the basis of the evidence before us, therefore, we consider both sites are deliverable.

Housing Sites with Planning Permission or Awaiting a S106 Agreement in the IP-One Area

328. Policy SP3 allocates land for housing across the Borough which already has planning permission or which benefits from a resolution to grant planning permission, awaiting the completion of a Section 106 Agreement. Table 2 lists these sites. However, in order to be effective a separate policy should be included in the AAP for those sites within the IP-One area. This should set out the details of each allocated site, including its location, site area and capacity, a site plan and any constraints to development, along with relevant supporting text **[MM270, MM271]**.

¹⁰⁶ Core Document K6, Table 7

329. Furthermore, additional sites (22 Stoke Street (IP031b); County Hall, St Helen's Street (IP084a); Webster's Saleyard Site, Dock Street (IP188); and 28-50 Grimwade Street (IP386)), which have been granted planning permission and/or made subject to a resolution to grant subject a Section 106 Agreement, since the publication of the submitted Plan, should be included within the New Policy for clarity and effectiveness **[MM270, MM271]**.

330. The deliverability and developability of some of these sites are considered further below.

30 Lower Brook Street (IP054a)

331. This site is allocated for 62 dwellings in Policy SP3, with a likely delivery timescale of the short term, and benefits from planning permission (Ref. 16/01037/FUL). The Council's Five Year Housing Supply Delivery Table confirms that the site is cleared and that the archaeology work has been completed, with the owner expected to market the site in early 2021. At the time of our site visit, this site was under construction by McCarthy and Stone for housing for the over 60s.

332. Accordingly, it is evident this site is deliverable and that its anticipated completion in year 4 on the new trajectory **[MM159]** is justified. For effectiveness, it should be moved to the New Policy for land with planning permission, or awaiting a Section 106 Agreement, in the IP-One Area **[MM270]**.

Land at Upper Orwell Street (IP074)

333. Policy SP3 allocates this site for 9 dwellings, with delivery likely to be in the short term. The Council's Five Year Housing Supply Delivery Table confirms that the site benefits from planning permission (16/01179/FUL), and that the site is cleared and the archaeological investigations have been completed. The land is in the control of a property development company and their construction plan indicates a programme for housing delivery of 18-24 months.

334. From the evidence before us, we are satisfied this site is deliverable and that its anticipated completion in year 3 on the new trajectory **[MM159]** is justified. For effectiveness, it should be moved to the New Policy for land with planning permission, or awaiting a Section 106 Agreement, in the IP-One Area **[MM270]**.

County Hall, St Helen's Street (IP084a)

335. Although it is not allocated in the submitted Plan, the Council resolved to grant planning permission, subject to the signing of a Section 106

Agreement, in January 2020 (Ref. 18/0117/FUL), for 40 dwellings on this site. The Council's Five Year Housing Supply Delivery Table indicates that the owner of the site is a developer and intends to progress the Section 106 Agreement and commence development.

336. To give greater certainty over its delivery and to plan positively for meeting housing needs, we consider this site should be included within the New Policy for land with planning permission, or awaiting a Section 106 Agreement, in the IP-One Area **[MM270]**. From the evidence before us, we are satisfied that it is deliverable and that its anticipated completion in year 4 on the new trajectory **[MM159]** is justified.

Land at Duke Street (IP142)

337. This site is allocated in Policy SP3 for 44 dwellings. The Council's Five Year Housing Supply Delivery Table confirms that it benefits from planning permission (Ref. 17/00570/FUL) and that the site is now in the control of a development company, with development due to commence in early 2021.
338. From the evidence before us, therefore, we are satisfied that this site is deliverable and that its anticipated completion in year 5 on the new trajectory **[MM159]** is justified. For effectiveness, it should be moved to the New Policy for land with planning permission, or awaiting a Section 106 Agreement, in the IP-One Area **[MM270]**.

Former British Telecom, Bibb Way (IP279a)

339. Policy SP3 allocates this site for residential development (104 dwellings), with a likely delivery timescale of the short term. The Council's Five Year Housing Supply Delivery Table confirms that this site benefits from prior approval for the conversion of the existing office building to residential (Ref. 18/00470/P3JPA). However, a new planning application is anticipated for this and the neighbouring sites (IP279b(1) and IP279b(2)), with a reduction in housing numbers for this site to 78 dwellings, albeit there would be an increase in overall capacity of 1 dwelling across all three sites.
340. The site is owned by the Council and will be developed by Ipswich Borough Assets Limited, who will take a comprehensive approach to the redevelopment of this site, along with the neighbouring sites.
341. From the evidence before us, therefore, we are satisfied that this site is deliverable for the reduced capacity of 78 dwellings, which should be reflected in the New Policy for land with planning permission, or awaiting a Section 106 Agreement, in the IP-One Area for effectiveness **[MM270]**. Its anticipated completion in year 2 on the new trajectory **[MM159]** is also justified.

28-50 Grimwade Street (IP386)

342. Although it is not allocated in the submitted Plan, the Council granted planning permission (Ref. 19/01118/FUL) for the erection of 16 flats on this site in July 2020. The Council's Five Year Housing Supply Delivery Table indicates that the site is owned by the Council and that Handford Homes has commenced construction. To give greater certainty over its delivery and to plan positively for meeting housing needs, we consider that this site should be included within the New Policy for land with planning permission, or awaiting a Section 106 Agreement, in the IP-One Area, as an allocation **[MM270]**.

343. From the evidence before us, we are satisfied that this site is deliverable and that its anticipated completion in year 2 on the new trajectory **[MM159]** is justified.

Mixed Use Development within the IP-One Area

344. As set out earlier in this Report, in order to be justified and effective, allocated sites that incorporate a mix of uses should be set out within New Policies which include the requirements for each site for the mixed development proposed. For effectiveness, those sites within the IP-One area should be included within the AAP. These are considered in further detail below. In order to be consistent with national policy a change is required to the supporting text in the AAP to set out the benefits of mixed use developments **[MM278]**.

Waste Tip and Employment Area North of Sir Alf Ramsey Way (IP003)

345. This site is around 1.41ha and is currently used as a waste recycling centre, concrete batching plant and employment premises. Policy SP2 and Appendix 3B propose a mix of uses. Residential development, with an indicative capacity of around 114 dwellings, is the proposed primary use, with a likely delivery timescale of the long term; secondary uses are office or small scale retail and leisure. The new housing trajectory **[MM159]** indicates that the dwellings would be completed in years 12 to 15. We are satisfied that site is in a suitable location for residential development and there is sufficient lead in time for the exiting uses to be relocations. As such there is a reasonable prospect the site would be developable within the Plan period. For effectiveness, a New Policy is required for the site, which sets out the acceptable mix of uses along with the development requirements, together with new supporting text **[MM279, MM280]**.

Bus Depot, Sir Alf Ramsey Way (IP004)

346. The Bus Depot site, which extends to around 1.07ha, is currently in operation as such and this use would require relocating before development can be undertaken. Policy SP2 of the submitted Plan allocates this site for a mix of uses including residential development, with an indicative capacity of around 48 dwellings on around 50% of the site in, and a likely delivery timescale of the long term. Policy SP5 allocates the remainder of the site for around 5,000sqm of office floorspace. The new housing trajectory **[MM159]** indicates that the dwellings would be completed in years 10 and 11. From the evidence before us, we are satisfied that the existing use could be relocated within this timescale and that the site would be developable. However, for effectiveness, a New Policy is required for the site, which sets out the acceptable mix of uses along with the development requirements, together with new supporting text **[MM281, MM282]**.

West End Road Surface Car Park (IP015)

347. This site, which is around 1.22ha, is currently used for surface level long stay car parking. Policy SP2 in the submitted Plan allocates it for a mix of uses, including residential development on around 55% of the site, with an indicative capacity of around 67 dwellings and a likely delivery timescale of the medium term. Policy SP17 allocates the remainder of the site for a multi-storey long stay car park. The new housing trajectory **[MM159]** indicates that the dwellings would be completed in years 8 to 10. From the evidence before us, we are satisfied that the site would be developable. However, for effectiveness, a New Policy is required for the site, which sets out the acceptable mix of uses along with the development requirements, together with new supporting text **[MM283, MM284]**.

Key Street/Star Lane/Burton's (IP035)

348. This site is currently allocated for employment with a mix of other commercial uses in Policy SP5 of the adopted Plan. However, in Policy SP2 of the submitted Plan it is proposed for a residential-led mixed use scheme with residential development (for an indicative capacity of 86 dwellings) on 80% of the site, and office, leisure or small scale retail as secondary uses.

349. Whilst the site has been allocated for development for a number of years, there is evidence that the type of development now proposed would be viable in this location. A number of other residential-led mixed use schemes have been successfully developed on adjacent sites to the south around Wet Dock. Although this site is set one street back

from the Waterfront and is in a transitional area, sites to the north of Star Lane are also undergoing regeneration, with a recently completed office to residential conversion on Foundation Street and a scheme of retirement homes under construction in Turret Lane. As such, we are satisfied there is a reasonable prospect of the development proposed being delivered on this site within the Plan period.

350. The submitted Plan indicates that the likely delivery timescale for residential development on this site would be the medium term. The new housing trajectory **[MM159]** indicates that the dwellings would be completed in years 7 and 8. From the evidence before us, we are satisfied that this site would be developable. However, for effectiveness, a New Policy is required for the site, which sets out the acceptable mix of uses along with the development requirements, together with new supporting text **[MM285, MM286]**.
351. The proposed scheme would be to a density of approximately 200dph. Whilst the site promoter seeks a higher density to support development viability, the site is in a sensitive location, adjacent to a number of designated heritage assets and forms part of the transition area between the town centre and the Waterfront. It is not within the proposed tall buildings arc, which the buildings on the Waterfront are. The height and scale of any buildings on the site would need to reflect this and be sympathetic to the surrounding historic setting and any important views, which the proposed New Policy is justified in requiring **[MM285, MM286]**. The allocation does not include provision for on-site car parking, but this is a matter for determination at the planning application stage, taking account of the accessibility of the location by sustainable modes of transport and subject to other policies in the Plan.

Former Civic Centre, Civic Drive (Westgate) (IP040)

352. Policy SP2 of the submitted Plan allocates this site for primarily residential development, with an indicative capacity of 59 dwellings and a likely delivery timescale of the short term, with 10% retail and leisure development at ground/first floor level, which is allocated in policy SP10. However, following further assessment by the Council¹⁰⁷ in response to our MIQs, a change was suggested to the timescale for the delivery of housing on this site to the medium/long term. As a result, the housing trajectory set out in the proposed New Appendix to the Plan **[MM159]** indicates that the dwellings would be completed in years 9 and 10. From the evidence before us, we are satisfied that this justified and site would be developable. However, a New Policy is required which sets out the

¹⁰⁷ Hearing Position Statement on Matter 3 – Housing Provision, Ipswich Borough Council, November 2020

acceptable mix of uses on this site along with the requirements for its development, as well as new supporting text, to ensure that the AAP is effective **[MM287, MM288]**.

Land Between Cliff Quay and Landseer Road (IP042)

353. Policy SP3 allocates this site for residential development (222 dwellings) for delivery in the medium term. The site is subject to a planning application (15/01040/OUT) for a residential-led mixed use development, which with a resolution to grant subject to the signing of a Section 106 Agreement. The new housing trajectory **[MM159]** indicates that the dwellings would be completed in years 7 to 9. From the evidence before us, we are satisfied that this is justified and, as such, the site would be developable. However, for effectiveness, a New Policy is required for the site, which sets out the acceptable mix of uses along with the development requirements, together with new supporting text **[MM289, MM290]**.

Commercial Building, Star Lane (IP043)

354. This site is allocated for residential development in Policy SP2 and employment uses in Policy SP5. The housing trajectory, set out in the proposed New Appendix to the Plan **[MM159]**, indicates that the dwellings would be completed in years 7 and 8. From the evidence before us, we are satisfied that this is justified and that the site would be developable. However, in order for the AAP to be clear and effective, this site should be allocated for this mix of uses within a single New Policy and appropriate supporting text **[MM291, MM292]**.

Land at Commercial Road (IP047)

355. Policy SP2 allocates this site primarily for residential development (173 dwellings), as part of a mixed use scheme including hotel/leisure/retail and public open space, and an enhanced river path, for which it is also allocated in Policy SP6. The site is subject to a planning application (19/00148/OUT) for a residential-led mixed use development for up to 173 dwellings, which is awaiting the signing of a Section 106 Agreement. The Council sets out the current status of this site in its Five Year Housing Supply Delivery Table¹⁰⁸, which confirms that the owner is in the process of appointing a main contractor to build out the development, and that the Section 106 Agreement would be by the end of June 2021, with reserved matters submitted before the end of 2021. The new housing trajectory **[MM159]**, indicates that the dwellings would be completed in years 3 to 6.

¹⁰⁸ Core Document K18

356. From the evidence before us, we are satisfied that this delivery timescale is justified and, therefore, that the site would be deliverable and developable. However, to ensure that this site is retained for such uses and that the AAP is effective, a New Policy is required which sets out the acceptable mix of uses on the site, along with the requirements for its development, as well as new supporting text **[MM293, MM294]**.

Old Cattle Market, Portman Road (IP051)

357. This site is allocated in Policy SP5 for employment uses, including office development, main town centre uses (excluding retail) and car parking provision. In order for the AAP to be clear and effective, the site should be allocated for this mix of uses within a single New Policy, together with appropriate supporting text **[MM295, MM296]**.

Land Between Old Cattle Market and Star Lane (IP054b)

358. Policy SP2 allocates this site primarily for residential development (40 dwellings), alongside small scale retail and leisure and an extended or replacement electricity sub-station. The site has been allocated in an adopted Plan for a number of years, including for employment uses, but has, as yet not been redeveloped. It was noted at the Hearing that the changes to the Use Classes Order, which introduced Class E, would provide the landowners with more flexibility and that they were supportive in principle of the site's redevelopment for the uses proposed, alongside the continuation of the existing businesses, which want to continue in the short to medium term.

359. From the evidence before us, we are satisfied that this site would be developable and that the completion of this development within year 10, as set out in the proposed trajectory within the New Appendix to the Plan **[MM159]**, would be justified. In order for the AAP to be effective the mixed use development of this site should be incorporated in a New Policy, with supporting text, and should include employment uses to ensure flexibility in the site's redevelopment **[MM297, MM298]**.

Land East of West End Road (IP119)

360. This site is allocated for residential development (28 dwellings) in Policy SP2, with a likely delivery of the long term, and for employment uses in Policy SP5. From the evidence before us, we are satisfied that the site would be developable and that the completion of residential development in year 13, as set out in the proposed new trajectory **[MM159]**, would be justified. In order for the AAP to be clear and effective, the site should be allocated for this mix of uses within a single New Policy, with appropriate supporting text **[MM299, MM300]**.

Former St Peter's Warehouse, 4 Bridge Street (IP132)

361. This site is owned by the Council and extends to around 0.18ha. In the submitted Plan, it is allocated for residential development, in Policy SP2, with a likely timescale for delivery being in the medium term, and for B1a office, leisure and small-scale retail in Policy SP5. The site has been allocated in an adopted Plan for a number of years and, as yet, has not been redeveloped. At the Hearing the Council confirmed that this site would be subject to a masterplan, incorporating adjacent sites (IP136 and IP205), and that it had funding available to support this and any decontamination works required, prior to the commencement of development. We are satisfied that there is sufficient evidence to demonstrate this site would be developable, and that the completion of residential development within years 8 and 9, as set out in the proposed new trajectory **[MM159]** is justified. In order for the AAP to be clear and effective, the mixed use development of this site should be incorporated in a New Policy, with supporting text **[MM301, MM302]**.

Silo, College Street (IP136)

362. This site is allocated in Policy SP2 primarily for residential development (48 dwellings), with secondary uses to include offices, leisure and/or small scale retail in the long term. The site has been allocated in an adopted Plan for a number of years and has, as yet not been redeveloped. At the Hearing the Council confirmed it now owns the site and that it is developing plans for its delivery, including the preparation of a masterplan, which would incorporate adjacent sites (IP132 and IP205). From the evidence before us, we are satisfied that this site would be developable and that the completion of its development within years 10 and 11, as set out in the proposed new trajectory **[MM159]**, would be appropriate and justified. In order for the AAP to be effective, the mixed use development of this site should be incorporated in a New Policy, with appropriate supporting text **[MM303, MM304]**.

The Island Site (IP037)

363. This island site is located between the Wet Dock and the River Orwell, and is currently occupied by marine and leisure related businesses and uses. It is allocated in the submitted Plan for development for a mixture of uses, including 421 dwellings on around 70% of the site, and amenity green space, employment, leisure, restaurants, small retail and early years education.

364. This is a key site within the IP-One Area, at the heart of the Ipswich Waterfront, and the focal point for one of eight Opportunity Areas within the IP-One AAP. In addition, there are important pieces of transport

infrastructure required to connect the site to Stoke Bank to the west and the eastern side of the Wet Dock. A comprehensive, master planned approach is, therefore, required to bring the site forward.

365. However, currently the site is subject to a number of separate allocations and development requirements contained in Policies SP2, SP6, SP15 and SP16, and the site sheet at Appendix 3 to the SAP, with further development principles set out in the Opportunity Areas guidance. These lack co-ordination, contain unnecessary duplication of policy guidance and make it difficult for applicants to prepare proposals and for decision makers to know how to react to them. National policy expects plans to contain policies that are clearly written and unambiguous¹⁰⁹.
366. To ensure the AAP is effective and consistent with national policy, a New Policy and supporting text are required for the Island Site, to bring all of the development requirements and site specific policy guidance together in one place. **MM305** and **MM306** set this out and are necessary for soundness. We have amended the supporting text for the new policy in **MM306** from the wording that was subject to consultation, to remove the reference to Appendix 4, which is to be deleted from the Plan.
367. A number of detailed concerns were raised in representations and discussed at the Hearing, including whether the site can support the number of residential units proposed, the extent of the early years' facility and the precise requirements for additional access points to the island and the Wet Dock Crossing. Some of these points are clarified in the New Policy, but others, such as the size of the early years' facility, can be determined through the masterplan process.
368. With regard to the quantum of residential development, 421 dwellings on 70% of the site, represents a density of 100dph. Whilst this is an increase from the 271 dwellings for which site is allocated in the current adopted Plan, it is comparable to the density of other developments around the Waterfront. We also recognise that an increase in dwelling numbers supports the financial viability of the proposed development, given the potential infrastructure costs. Based on the evidence, we are satisfied that the estimated dwelling number is justified and appropriate.
369. Delivery of the residential units is projected from 2030/31 until the end of the Plan period, as set out in the proposed trajectory within the New Appendix to the Plan **[MM159]**. This would allow an 8 year lead in period from adoption of the Plan to resolve infrastructure constraints, prepare, consult on and adopt the masterplan, secure planning consent and any grant support required, and programme any business relocations

¹⁰⁹ Paragraph 16 of the NPPF

necessary. Given the timescale involved, there is a reasonable prospect that the site will be available for housing completions to be delivered at the point envisaged. Accordingly, we consider the site is developable.

The Mint Quarter (IP048a-d)

370. These four sites are allocated in the submitted Plan in several policies. Policy SP2 allocates IP048a and IP048b for residential development of 53 and 36 dwellings respectively, with reference to their proposed mix of uses including a primary school, car parking, open space and retail. IP048c, which benefits from prior approval for the development of 33 dwellings on the upper floors of 6-10 Cox Lane and 36-46 Carr Street, is allocated in Policy SP3. Policy SP6 allocates IP048 for open space and Policy SP7 also allocates IP048a in part for a primary school use. IP048b is allocated in part for retail development within Policy SP10. Finally, Policy SP17 allocates IP048 for short stay car parking.

371. It was confirmed at the Hearing that these sites would be subject to a masterplan to guide and support their redevelopment with landowner collaboration and community engagement. Furthermore, it was also agreed that for effectiveness, the extent of the area to be developed as a primary school (on site IP048d) should be clearly defined. In order for the AAP to be effective and clear, therefore, the mixed use development of these sites should be incorporated in a single New Policy, together with new supporting text, and a site plan **[MM219, MM307, MM308]**. We have amended the application requirements for the new policy in **MM307** from the wording that was subject to consultation, to remove a duplicated reference to a scheduled monument. From the evidence before us, we are satisfied that this site would be deliverable and developable, and that the completion of this development within the current year (IP048c) and years 8 and 9 (IP048a and IP048b), as set out in the proposed new trajectory **[MM159]** is justified.

Opportunity Sites in the IP-One Area

372. The SAP includes a policy, SP4, relating to four Opportunity Sites within the IP-One area that have potential for housing led-redevelopment and would contribute towards the regeneration of the Waterfront and Town Centre Quarters. In order for the Plan to be effective, Policy SP4 and its supporting text should be deleted from the SAP **[MM178, MM179]**, and added to the AAP, with some minor amendments to reflect its new location within the Plan and to include changes as a result of amendments to the UCO, in order for it to be effective **[MM272]**. Furthermore, the development requirements for each Opportunity Site, along with a plan showing the extent of each site, included within Appendix 4 of the submitted Plan, should be included in the policy to

ensure that it is clear and effective **[MM272]**. Reference to the sites' archaeological constraints and the recommendations of the Ipswich Wildlife Audit should be added to the supporting text for effectiveness **[MM273]**. As a result, Appendix 4 should be deleted in its entirety, as it is no longer justified **[MM313]**. We have amended the development requirements for site IP226 at Helena Road/Patterson Road in **MM272**, as it was published for consultation, to remove a duplicated criterion.

Land Allocated for Employment Use in the IP-One Area

373. Policy SP5 allocates land for employment use across the Borough and Table 3 lists these allocated sites. However, in order for the AAP to be effective a separate policy is required for land allocated for this use within the IP-One area, which incorporates the allocations table and any constraints and site plans included in the Site Sheets in Appendix 3 of the submitted Plan, together with new supporting text. As discussed earlier in this Report, sites allocated for a mix of uses, including employment use, should be the subject of separate policies in order to be effective. However, the new employment policy in the AAP should include reference to those mixed use sites within the IP-One area, where employment uses are included in the mixed use allocation for clarity and effectiveness **[MM274, MM275]**.

Land Allocated and Protected as Open Space in the IP-One Area

374. Policy SP6 in the SAP allocates land for open space as well as protecting existing open space across the Borough. However, in order for the AAP to be effective, a separate policy, which incorporates the allocations table and any constraints included in the Site Sheets in Appendix 3, along with supporting text, is required for land allocated and protected for this use within the IP-One area. As discussed earlier in this Report, sites allocated for a mix of uses, including open space, should be the subject of separate policies in order to be effective **[MM276, MM277]**.

Conclusion

375. Subject to the MMs set out above, we conclude that the AAP for the IP-One Area is sound and that the policies and proposals are positively prepared, justified, effective and consistent with national policy.

Issue 8 – Whether the development management policies in the Plan are justified, positively prepared, effective and consistent with national policy?

376. The CSP sets out a series of Borough-wide development management policies, some of which are considered in more detail below.

Sustainable Construction

377. Policy DM1 requires new residential development to meet a high standard of environmental sustainability. On 25 March 2015, a Written Ministerial Statement (WMS) established a new system of housing standards, with new additional optional Building Regulations on water and access, and a new national space standard. This system complements the existing set of Building Regulations. The WMS advises that local plan policies should only require new housing to meet any of the optional national technical standards, if they address a clearly evidenced need and where their impact on viability has been considered.

378. Paragraph 9.1.5 of the supporting text to Policy DM1 refers to East Anglia as an area of 'severe water stress'. Lowering water demand is one of the measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. The cost for the optional water efficiency standard has been factored into the appraisal assumptions for housing development in the WPVA, and Policy DM1 allows for viability to be taken into account. Therefore, we are satisfied that there is clear evidence of need for the inclusion of the optional water efficiency standard in Policy DM1, and that the impact of this on viability has been appropriately considered. As such, the policy is justified and consistent with national policy in this respect.

379. With regard to carbon dioxide (CO₂) emissions, as part of the new system, the Code for Sustainable Homes (CSH) has been withdrawn. However, Local Plan policies may continue to require energy performance requirements to be set at a level equivalent to the outgoing CSH Level 4. The Building Regulations set energy requirements at the equivalent of CSH Level 3. Level 4 represents a 19% (or greater) improvement over this in terms of CO₂ emissions. However, as submitted, criterion a) of Policy DM1 requires CO₂ emissions of 19% below the Target Emission Rate in the 2013 edition of the 2010 Building Regulations (Part L). This could be interpreted as a 19% worsening of the Building Regulations emission rate. To ensure that Policy DM1 is clear in requiring an improvement, namely a reduction in the level of CO₂ emissions through better energy efficiency, a change is required to the policy to confirm that housing development should achieve at least a 19% improvement in energy performance over the requirements of the Building Regulations in order for it to be effective **[MM75]**.

Decentralised, Renewable or Low Carbon Energy

380. Policy DM2 requires new build residential or non-residential development, above specific thresholds, to provide at least 15% of their energy requirements from decentralised and renewable or low carbon energy sources. The Planning and Energy Act 2008 allows planning policies to impose reasonable requirements on new developments for a proportion of energy requirements to be from renewable sources and/or low carbon energy sources. The PPG also allows LPAs to set energy performance standards for new housing that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes (CSH)¹¹⁰. A 15% requirement from renewable or low carbon sources is less than or equivalent to CSH Level 4.
381. Whilst a 15% requirement is consistent with national policy, having regard to the viability evidence in the WPVA, any increase in this percentage could negatively impact the viability of residential development within the Borough, and would not therefore be justified. Accordingly, we are satisfied that the 15% requirement in Policy DM2 is justified and consistent with national policy.
382. The March 2015 WMS states that small housing sites of 10 units or fewer will be exempted from off-site carbon abatement measures. However, Policy DM2 refers to new build developments of 10 or more dwellings, rather than more than 10 dwellings. A change is required therefore in order for the policy to be consistent with national policy in this regard **[MM76]**.

Transport and Access

383. Policy DM21 seeks to promote sustainable growth in Ipswich and reduce the impact of new development on traffic congestion. In doing so, it sets out a number of criteria for proposals to meet. In order to be clear what is required in respect of air quality, changes are required to Criterion b, including the reference to Policy DM3, so that the policy is effective. In addition, a new criterion is necessary to refer to the contribution to other mitigation measures identified through Policy CS20 and the ISPA Transport Mitigation Strategy, to ensure that Policy DM21 is effective **[MM99]**.
384. The policy also requires applicants to demonstrate how any adverse transport impacts would be acceptably managed and mitigated, but in order to be effective and to assist in the Council achieving its modal shift target, Policy DM21 should also require applicants to demonstrate how proposals would contribute to meeting this **[MM99]**. Furthermore, in

¹¹⁰ PPG Paragraph: 012 Reference ID: 6-012-20190315

order to be effective, Policy DM21 should make it clear when a Transport Statement or a Transport Assessment would be required. Changes are therefore required to the policy in this regard **[MM99]**.

385. The supporting text to Policy DM21 requires some changes for clarity and effectiveness. Paragraph 9.21.7 which should be amended to make it clear that development must have regard to the emerging Low Emissions SPD **[MM100]**. Paragraph 9.21.8 should be amended to reflect the recent changes to the UCO and to make it clear that development should have regard to the thresholds set out in the Suffolk Travel Plan Guidance, where a Travel Plan is required **[MM101]**. In order to be effective, the definition of Travel Plans in Appendix 5 of the CSP also requires amending to set out clearly the primary purpose of a Travel Plan **[MM156]**.

Car and Cycle Parking

386. Policy DM22 sets out the requirements for car and cycle parking in new development. This includes that all new development will be required to comply with adopted car and cycle parking standards. These adopted standards do not form part of the Plan and, as such, have not been the subject of public consultation and Examination as part of this process. In order to be consistent with national policy, justified and effective, Policy DM22 should be amended to delete this requirement and a reference to new development 'having regard to' car and cycle parking 'guidance' added **[MM102]**.
387. In order to reduce congestion, manage air quality and encourage a modal shift away from the car, the Plan seeks to limit long-stay car parking in the central car parking core. To be clear and effective, therefore, Policy DM22 also needs to refer to further on-street parking not being permitted within the central car parking core, so that long-stay car parking is not increased within this area **[MM102]**. Clarification that the limit on long-stay car parking provision applies across the IP-One area to support modal shift measures is also necessary for effectiveness, in Policy DM22 and its supporting text **[MM102, MM103]**. The supporting text should also include examples of the necessary operational parking, which would be allowed for non-residential development within the central car parking core, in order to be clear and effective **[MM103]**.

Heritage Assets

388. Paragraph 190 of the NPPF says that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. Policy DM13 requires that new development proposals consider the impacts on the historic built environment, seek opportunities for

enhancement of the town's heritage and respond to the historic pattern of development and character of the area. Although listed buildings, conservation areas and non-designated heritage assets are mentioned specifically in the policy, designated heritage assets are not referred to. In order to be consistent with national policy, a change is required to Policy DM13 in this regard, with corresponding changes to the sections of the policy referring to listed buildings and conservation areas to avoid any duplication in respect of total or substantial demolition **[MM93]**.

389. Amendments to the wording of Policy DM13 are also required, for effectiveness, in respect of the use of conditions to withdraw permitted development rights, where this is justified to preserve the character and appearance of the conservation area. For consistency with national policy, the approach to assessing the effect of a proposal on the significance of a non-designated heritage asset should be clarified **[MM93]**.

390. In order for the supporting text to Policy DM13 to be clear and unambiguous, a new paragraph is required for effectiveness to refer the need for pre-application discussions with the relevant bodies for any development proposal affecting a scheduled monument within the IP-One area, as well as the procedure for Scheduled Monument Consent **[MM95]**. As a result, a corresponding deletion of the reference to Historic England administering the Scheduled Monument Consent process is required for effectiveness and to avoid duplication **[MM94]**.

Green Infrastructure and the Natural Environment

391. Policy DM8 deals with the natural environment and requires that all development must incorporate measures to provide net gains for biodiversity. In respect of Sites of International and National Importance, the policy should state what is required for any development proposals with the potential to impact upon a SPA, SAC or Ramsar Site in order to be consistent with national policy **[MM84]**. Consequential changes will also be required for effectiveness in respect of the supporting text **[MM85]**. Furthermore, in respect of Local Nature Reserves and County Wildlife Sites, the policy should make it clear that planning permission will not be granted for development that would result in damage or loss in extent or otherwise have a significant adverse effect on such sites, if the harm cannot be avoided, adequately mitigated or, as a last resort, compensated for, in order to be consistent with national policy **[MM84]**.

392. The Ipswich Ecological Network, referred to in Policy DM8 and illustrated geographically on Plan 5 in the CSP, has been updated to reflect the findings of the Ipswich Wildlife Audit 2019¹¹¹. For clarity and

¹¹¹ Core Document D21

effectiveness, a revised version of Plan 5 is needed, showing the changes to the core areas and corridors **[MM161]**. These changes should also be added to the Policies Map.

393. Policy DM10 seeks to establish Green Corridors within the Borough, linking to adjacent open spaces and walking, cycling or riding routes. The supporting text to this policy confirms that it includes the Blue Corridor of the river valley. In order to be clear and effective, changes are required to the policy and the supporting text **[MM86, MM87]**. For effectiveness, a minor wording change is also required to the supporting text on development taking place within 10m of the river **[MM87]**.
394. Development within the countryside is dealt with in Policy DM11. However, in order to be consistent with national policy, reference also needs to be made to the contribution that land within the setting of an AONB makes to its natural beauty, landscape and special qualities in Policy DM11 and its supporting text **[MM88, MM89]**.

Design and Character

395. Policy DM12 requires all new development to be well designed and sustainable, providing layouts and designs that create a safe and attractive public realm capable of being used by all. Paragraph 97 of the NPPF says that planning policies should promote public safety, including taking appropriate and proportionate steps to reduce vulnerability, increase resilience and ensure public safety and security. In order to be effective, a change is required to Policy DM12 and its supporting text to make it clear that account should be taken of building safety requirements under other legislation **[MM90, MM91]**.
396. Furthermore, Policy DM12 should be amended to include references to examples of measures which could be used to create greener streets and spaces to contribute to local biodiversity net gain, visual amenity, health and well-being and offset the impacts of climate change in order to be effective and consistent with national policy **[MM90]**. To ensure consistency with national policy, the reference to the PPG should be replaced with the relevant reference to Section 12 of the NPPF in paragraph 9.12.13 of the supporting text to this policy **[MM92]**.
397. In order to be consistent with national policy, Policy DM15, which relates to the design of tall buildings within an arc of land to the south-west of the town centre, should be amended to include reference to scheduled monuments and the settings of all heritage assets in addition to listed buildings, conservation areas and heritage assets **[MM96]**.

Infill and Backland Residential Developments

398. For effectiveness, a change is required to Policy DM17, to make it a requirement that proposals for small scale residential development involving infill, backland or severance plots protect existing habitats and biodiversity in accordance with Policy DM8 **[MM97]**.

Protection and Provision of Community Facilities

399. For effectiveness, Policy DM24, which deals with the protection and provision of community facilities, should be amended to delete the phrase 'to the Council's satisfaction', as this does not make it clear what an applicant is required to demonstrate **[MM107]**. The changes to Appendix 6 to the CSP referred to elsewhere in this Report, in respect of the marketing requirements to demonstrate 'no reasonable prospect', are also necessary to ensure Policy DM24 is effective and consistent with the PPG **[MM158]**.

Advertisements

400. For clarity and effectiveness, a change is required to Policy DM26 to make it clear that it is the LPA who will refuse advertisements that are contrary to this policy **[MM108]**.

Arts, Culture and Tourism

401. As the policies in the Plan, once adopted, will supersede those in the existing adopted Plan, the reference to Policy DM28: Arts, Culture and Tourism, as being 'formerly Policy SP14', is not justified, and should be deleted **[MM120]**.

Amenity

402. Policy DM18 seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not result in an unacceptable loss of amenity. In order to be effective and to guide development proposals in what is considered to be an acceptable standard of amenity in terms of privacy and overlooking, the policy should include minimum privacy distances and set out clearly where distances of less than the minimum would be considered. Reference to the Ipswich Space and Design Guidelines SPD, which include more detailed guidance on amenity, should also be included for effectiveness **[MM98]**.

Conclusion

403. Subject to the MMs set out above, we conclude that the development management policies in the Plan are justified, positively prepared, effective and consistent with national policy.

Issue 9 – Is the strategy for implementation, monitoring and review appropriate and robust?

Implementation

404. The strategy for the implementation of the Plan is contained in chapter 10 of the CSP. It sets out key partnerships that are working to ensure the delivery of strategic infrastructure, over and above the requirements related to individual planning applications. The SAP also includes a chapter on Implementation, Monitoring and Review, which is an unnecessary duplication of the content of chapter 10 of the CSP. Paragraph 16f) of the NPPF says this should be avoided. Accordingly, it should be deleted to be consistent with national policy **[MM309]**.
405. Tables 8A and 8B list the major infrastructure proposals necessary to deliver the growth set out in the Plan as a whole and specifically at IGS. We have discussed the need for MMs to these elsewhere in the Report. For clarity and effectiveness, an amendment to the supporting text in chapter 10 is necessary to reference the role of the IDP **[MM136]**.

Objectives, Indicators and Targets

406. Chapter 11 details the targets and indicators against which the 12 Objectives of the Plan will be measured and monitored. So that the monitoring framework is robust and effective, a number of the indicators and targets need to be replaced, amended or added to so that it is evident how the Council will measure the delivery of the Plan and whether its Objectives are being realised.
407. The required changes are set out in the following series of modifications: **MM138, MM139, MM140, MM141, MM142, MM143, MM144, MM145, MM146, MM147, MM148, MM149** and **MM150**. In particular, they include the ambitious, but critical target of a 15% modal shift in journeys from private vehicles to sustainable transport modes by residents by 2031 **[MM144]**. In turn this should contribute towards the Borough achieving compliance with air quality limit values in line with national policy.
408. For clarity and effectiveness, **MM3** also amends the title of Objective 5 in the vision of the Core Strategy, to ensure its clear that the reduction in emissions contributes towards the mitigation of climate change.

Monitoring and Review

409. Chapter 12 summarises the approach to the monitoring and review of the Plan. For effectiveness, it should make clear the inter-relationship

between the monitoring of the Plan and other key local strategies, such as the Air Quality Strategy and Strategic Housing Strategy. For consistency with national policy, reference should also be made to the statutory requirement for the Plan to be reviewed within 5 years from adoption **[MM151]**.

Conclusion

410. Subject to the MMs identified above, we conclude that the strategy for implementation, monitoring and review of the Plan is appropriate and robust.

Overall Conclusion and Recommendation

411. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

412. The Council has requested that we recommend MMs to make the Plan sound and legally compliant and capable of adoption. We conclude that the duty to cooperate has been met and that, with the recommended MMs set out in the Appendices to this report, the Ipswich Local Plan Review 2018-2036 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Karen L Baker and Mike Hayden

Inspectors

This Report is accompanied by Appendices containing the schedule of Main Modifications.