

Date: 2 March 2020  
Enquiries to: Cameron Clow  
Tel:  
Email:



Ipswich Borough Council,  
Grafton House,  
Russell Road,  
Ipswich,  
IP1 2DE

Dear Mr Fulcher,

### **Ipswich Draft Local Plan: Regulation 19 Consultation**

Thank you for consulting Suffolk County Council on a new Local Plan for the county town of Ipswich.

Suffolk County Council (SCC) strongly supports the Borough Council's efforts to put a plan in place to guide sustainable growth. Throughout the process of producing this Plan, the Borough and County Councils have made extensive efforts to cooperate on local and strategic matters, not least through the Ipswich Strategic Planning Area Board, and the County Council is grateful for the efforts made by the Borough.

Generally, the County Council supports the draft Local Plan, however there are parts of the plan which require amending to be sound.

This letter will set out where the plan is not sound, explain which of the tests soundness parts of the plan does not comply with (as set out in paragraph 35 of the NPPF). The County Council considers that the plan can be made sound and will provide support to the Borough Council to do so where necessary.

Where amendments to the plan are recommended, deleted text will be in ~~strikethrough~~ and added text will be in *italics*.

#### **Table 8a Major Infrastructure Proposals**

This part of the plan is not sound because it is not in line with national policy. NPPF paragraph 34 explains that plans should set out the contributions expected from development and this part of the plan needs updating to meet this requirement. The County Council will work with the Borough in reviewing the wording and costs in the table and will agree matters through a Statement of Common Ground.

#### ***Early Years Education***

This part of the plan is not sound as it is not effective. In setting out the strategy to address early years demand caused by growth in the Gipping Ward, the table states that a new setting (such as a day nursery) on a development site is required, however the specific site has not been stated. In order to provide certainty that development in the Gipping Ward can mitigate its impact, the site should be specified in the plan. Options considered throughout the plan making process have been

sites IP003, IP051 and IP279. IP003 and IP051 are both within flood zone 3, while IP279 is largely outside flood zones 2 and 3. Taking a sequential approach to more vulnerable uses, IP279 would be the County Council's preferred choice for a setting. The site sheet and entry in Table 1 of the Site Allocation Policies document should also be updated in line with this amendment.

#### *Primary Education.*

In addition to the expansion of Rose Hill Primary, St Mark's and Sprites Primary schools, there will be a requirement to expand Cliff Lane Primary School. However, depending on the precise number of pupils, either St Mark's or Sprites Primary schools or both would need to expand. To make this part of the plan sound, Cliff Lane Primary should be added to Table 8a.

#### *Secondary Education*

The County Council has reassessed the secondary school needs arising from the local plan with updated pupil forecasts (January 2020), which has resulted in a change of strategy. Table 8a currently states that both Stoke High School and Chantry Academy need to be expanded. In previously assessing the need for secondary school places, SCC used the school pyramids to identify where pupils from development would attend school. However, Ipswich is unusual in Suffolk in that the school pyramid areas and the secondary school catchment areas are different from one another. On reflection, the County Council considers it is more appropriate to base the secondary school strategy on the school catchments. Depending on the rate of delivery within Ipswich Garden Suburb, this results in only Stoke High School needing to expand..

#### Primary Education

##### *Site Sheet for Site IP010a*

This part of the plan is not sound because it is not effective. The County Council welcome that the need to expand the school has been recognised within the plan, however feasibility work which has been undertaken since the preferred options consultation of the plan show that the area of land needed to expand the school is 0.8ha.

#### Early Years Education

##### *Site Sheet for Site IP048a*

This part of the plan is not sound because it is not effective. Included among the uses of this site should be an early years setting to accompany the new primary school. The 60 place early years setting, which is necessary on this site to mitigate impacts of plan growth, is accounted for in Table 8a of the Core Strategy document. However, this should also be included on the site sheet in order to provide certainty in delivering an early years setting on this site.

##### *Table 1 of the Site Allocations Policies document*

This part of the plan is not sound because it is not effective. The entry for site IP048a and IP037 on this table should include an early years setting, to provide certainty in delivering an early years setting on this site, in order to mitigate the impacts of growth on the provision of early education.

#### Transport

As justification for this policy the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area should be included in the plan evidence base, alongside the results of the Suffolk Transport Model.

##### *Policy CS20 and Transport Mitigation Strategy for the ISPA*

Reference to the Transport Mitigation Strategy for the ISPA is welcome and very much supported, as is the focus on sustainable transport measures. As a strategic priority, the Plan needs to address the cumulative transport impact created by planned growth in the Ipswich Strategic

Planning Area (ISPA). As a cross boundary issue, it is appropriate that this is reflected in strategic policy, as stated in paragraph 21 of the NPPF. Suffolk County Transport Model highlights that growth in Ipswich and the surrounding districts may cause severe impacts on the highway network within and around Ipswich, which cannot be addressed through improvements to the highway alone. The Plan must include an appropriate strategy to avoid severe and significant transport impacts in the ISPA. Within the wider Ipswich area, the strategic routes of the A14 and A12 would also receive greater volumes of traffic, which could have severe consequences for traffic flows along these routes and the safety of road users. Several substantial modifications to junctions would be required, which would require significant investment funded by new developments.

Understanding that viability for new development could be comprised, and reflecting on the need to shift travel patterns, the County Council sought to work out what degree of modal shift would be required and what steps could be taken to produce such shifts. The resultant Mitigation Strategy was produced to provide evidence during the Suffolk Coastal Local Plan examination and not just for this part of Suffolk, but also for the Borough of Ipswich, Babergh and Mid Suffolk districts.

The County Council considers the appropriate strategy to be maximising sustainable transport in order to achieve a significant proportion of modal shift in both the new and existing population. The Mitigation Strategy was submitted as evidence to the Suffolk Coastal Local Plan Examination and referenced in the County Council response to the Babergh and Mid Suffolk Preferred Options Joint Local Plan and includes:

- A Transport Mitigation Strategy for the Ipswich Strategic Planning Area – representing Suffolk County Council's approach to delivering modal shift measures to reduce impacts on the highway network and key junction improvements;
- A transport modelling report, which assesses the impact of applying the modal shift identified in the Transport Mitigation Strategy and evidence submitted alongside the Plan;
- A methodology report which supports the modelling report; and
- A statement on highway impacts on the Strategic Road Network, produced by consultants WSP

The evidence base for the Local Plan includes the most recent Suffolk Transport Model results and methodology report, which is welcome. In order to have a consistent approach to addressing the described impacts in the ISPA and on Ipswich, a shared evidence base across planning authority boundaries is required to justify this approach. The Suffolk County Council Transport Mitigation Strategy is currently not part of the evidence base of the submission draft Local Plan and needs to be included in order to ensure this approach is sound. Achieving significant modal shift is a Local Plan Objective (5) and the Transport Mitigation Strategy is reflected in policies CS5 and CS20.

#### *Policy DM21*

This part of the plan is not sound because it is not in line with national policy, specifically in relation to the lack of explanation as to when travel plans are required. Paragraph 111 of the NPPF states that where a development is likely to generate significant amounts of movement should be supported by a Travel Plan. The County Council has produced further detailed guidance<sup>1</sup> as to when a Travel Plan or Travel Plan measures should be implemented for a site. These indicative thresholds are set out in the table below.

The importance of travel plans in achieving modal shift to sustainable modes of transport is stated in the Suffolk County Council Transport Mitigation Strategy for the ISPA which states in paragraph 5.2.16:

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<sup>1</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/26444-Suffolk-Travel-Plan-Guidance-V5-Web-Version-LR.pdf>

“The effectiveness of Travel Plans secured through the planning process would only provide a contribution towards positive modal shift if fully supported. There needs to be a firm endorsement of the role that Travel Plans have in the effective mitigation of development supported through local plan policy”

A similar approach should be taken with Travel Plans as is taken with Transport Statements and Assessments. The Plan’s explanatory text should make reference to the Indicative threshold set out in County Council guidance, with the caveat that in some sensitive areas, such as those within or affecting Air Quality Management Areas, full travel plans may be required where normally Travel Plan Measures would be acceptable. The table below shows the thresholds included in the County Council guidance.

Land use	Travel Plan measures required	Travel Plan required
<b>A1 Food retail</b>	→250←800 sq. m	→800 sq. m
<b>A1 Non-food retail</b>	→800←1500 sq. m	→1500 sq. m
<b>A2 Financial and professional services</b>	→1000←2500 sq. m	→2500 sq. m
<b>A3 Restaurants and cafés</b>	→300←2500 sq. m	→2500 sq. m
<b>A4 Drinking establishments</b>	→300←600 sq. m	→600 sq. m
<b>A5 Hot-food takeaway</b>	→250←500 sq. m	→500 sq. m
<b>B1 Business</b>	→1500←2500 sq. m	→2500 sq. m
<b>B2 General industrial</b>	→2500←4000 sq. m	→4000 sq. m
<b>B8 Storage or distribution</b>	→3000←5000 sq. m	→5000 sq. m
<b>C1 Hotels</b>	→75←100 bedrooms	→100 bedrooms
<b>C2 Residential institutions - hospitals, nursing homes</b>	→30←50 beds	→50 beds
<b>C2 Residential institutions - residential education</b>	→50←150 students	→150 students
<b>C2 Residential institutions - institutional hostels</b>	→250←400 residents	→400 residents
<b>C3 Dwelling houses</b>	→50 ←79 dwellings	→80 dwellings
<b>D1 Non-residential institutions</b>	→500←1000 sq. m	→1000 sq. m
<b>D2 Assembly and leisure</b>	→500←1500 sq. m	→1500 sq. m
<b>Others</b>	Discuss with SCC Highways	Discuss with SCC Highways

In order to ensure that all development deliver a sufficient Travel Plan or Travel Plan measures an amendment to the policy is recommended below.

“The Council will expect major development proposals to provide a travel plan or travel plan measures where appropriate, to explain how sustainable patterns of travel to and from the site will be achieved.”

An amendment to paragraph 9.21.8 is recommended below to further explain the travel plan guidance and what is determined to be “appropriate”.

“The County Councils Suffolk Travel Plan Guidance, which contains indicative thresholds will be used to determine the need for a Travel Plan or Travel Plan Measures. Some

*smaller sites which do not meet the requirements for a full Travel Plan, but are in sensitive locations may require a full Travel Plan to help mitigate traffic impacts."*

#### **ISPA4**

The County Council welcomes the policy commitment to coordinate development across boundaries. It is noted that this area is outside of any of the buffers district or local centres defined on Plan 1. NPPF paragraph 92 states that planning policies and decision should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services." Paragraph 103 states that the planning system should limit the need to travel, through an appropriate mix of uses.

In order to enable access to services and make future communities in the area defined by ISPA4 sustainable the policy should state the masterplanning of the site should also consider the inclusion of a local centre.

This will also help to keep the plan more internally consistent as paragraph 6.17 states that where possible development should be located so that residents can access existing local or district centres. As this is a large development, outside of local or district centre buffers, the potential scope for a new local centre appears to be an aspect that should be investigated through masterplanning.

#### **Town Centre Parking**

In considering the future of Ipswich, the combined challenges of reducing carbon dioxide emissions to mitigate the impact of climate change and improving the air quality of major towns like Ipswich does mean that there needs to be a reduction in the number of private cars using the highway network in Ipswich throughout the plan period, regardless of technological improvements.

Furthermore, there is simply not the physical space within the town to allow for a free-flow of traffic with the level of travel demand that is likely to be generated. Producing the shift in travel patterns is required over the long-term but short-term actions are also necessary. These are currently but are not limited to:

- Promotion of travel planning to existing residents and employees, as well as those from new development. (The programme is known as Smarter Choices and the positive way individuals can make such changes in personal travel a fundamental feature);
- The quality bus partnership, which is already being established, to improve the coordination between bus companies and target investment into bus services;
- Physical infrastructure improvements that are necessary to improve public transport provision and encourage more people to walk and cycle, and
- Achievement of a parking strategy that supports modal shift.

During 2019, WYG Transport Planning finalised its report into forming a parking strategy, which Ipswich Borough Council commissioned to support its forthcoming strategy. This study focused on public car parks in the town centre and did not include private staff car parks. The report has only recently been published by the Borough Council, although Suffolk County Council was involved in different stages during its production.

#### **WYG Report**

There is a tension between managing parking demand and achieving a shift in travel from single-occupancy trips by car. This tension, and the need for a balance, is expressed well by WYG (para. 7.2.8) that:

*"It is important that the parking strategy fits as one element of a coherent overarching transport and access strategy for the town. Care should be taken to ensure that the proposed level of parking is not set too high as to inadvertently encourage car use to access the town to the detriment of more sustainable modes, particularly if doing so would be likely to undermine the viability of such services and supporting infrastructure (e.g. congestion increasing delay for public transport vehicles or severance of key links for pedestrians and cyclists by major traffic corridors). This said, the future prosperity and economic success of the town centre will be reliant upon reasonable access by car."*

There is also considerable acknowledgment of the potential role for Park and Ride services in reducing demand for town centre parking but that this potential could be inhibited unless "major changes are also made to the number of spaces and cost of town centre parking" (para. 6.3.9). Furthermore, Park and Ride services could assist freeing up long stay spaces to short stay (para. 9.5.6) and that "the parking strategy needs to be consistent with the Local Transport Plan if steps to tackle congestion and air quality problems are to be successful" (para. 9.6.3).

WYG's report makes recommendations and does not set out a strategy, this will be formed and adopted by the Borough Council separately (Policy CS20.e.). WYG's report includes several policy options and matters that require further consideration. For example, regarding parking and land use development, WYG recommend (page 105) the Borough Council:

*"Consider the impacts of redistributing car parks across the town centre to better meet demand in the future. It may be necessary to create more spaces in the Riverside, Station & Office and Town Centre North zones and reduce the future number of spaces in the remaining zones."*

The WYG analysis accounts for the replacement of all temporary car park spaces and, whilst the replacement parking spaces in Town Centre Central, East & West is "of the right order", additional spaces over and above the planned additional spaces were identified within the Riverside & Cardinal Park area, around the Station & Office area to the West of the Town Centre, and within the area to north of the Town Centre (para. 9.3.7). However, the provision of additional spaces is one of the options contained the WYG report.

In commissioning this report, the Borough Council did take account of the need to achieve modal shift, which translated into an overall reduction in future parking demand by 10% on additional growth. This reduction reduces the growth in parking demand assumed to arise based on TEMPro growth factors. The analysis was undertaken in 2017 and, at the time, the use of the growth factors and the 10% modal shift assumption was reasonable, but both assumptions predate the Transport Modelling by WSP or the Transport Mitigation Strategy. For example, the WSP Modelling assumes a 15-20% reduction in employment trips to the Town Centre by new development (ISPA Local Plan Modelling, Table 5-2).

The Local Plan modelling includes trips already on the road network and accessing existing car parking spaces. However, as the Borough Council prepares its parking strategy, the implications for transport modelling need to be considered because there might be different impacts from that already modelled such as through the relocation of existing spaces.

For Ipswich (the whole administrative area), TEMPro predicts a 19% growth in car-based trips between 2016-2036, whereas the modelling for the Local Plans indicates a 31% increase in the AM peak destination trips.

The WYG analysis recommends using new technology to analyse occupancy data to better understand the location and quantity of long and short stay parking and the turnover of spaces (page 114). This, combined with other technological improvements such as variable message

signs, should allow for increased occupancy beyond the 85% occupancy level assumed in the report.

What is notable is that the parking survey undertaken before the reopening of the Crown Street Car Park and the occupancy of some car parks was modelled from other surveys.

In summary, the rate of traffic growth assumed by the parking strategy is lower than that which is being forecast by the Local Plan modelling, even accounting for modal shift. However, meeting this demand would only not address the level of congestion and the combined challenges carbon reduction and improving the air quality.

### *Parking Strategy outlined in the Local Plan*

Part of the equation in development and implementing the parking strategy will be the need to constrain the attractiveness of long stay parking for commuters who are working in Ipswich. The current Reg 19 document does recognise:

- the need to mitigate transport impacts within Ipswich because of planned growth in the overall Ipswich strategic planning area;
- the modal shift strategy that was published by Suffolk County Council during the examination of the Suffolk Coastal Local Plan;
- the quality bus partnership;
- the promotion of smarter choices;
- Infrastructure improvements,
- within the central parking core, the achievement of a parking strategy that supports modal shift.

The Local Plan also highlights park and ride provision, particularly the Bury Road park and ride site. The Local Plan also states that a new Ipswich Town centre parking plan will be adopted. Clearly, the Local Plan cannot take account of the yet to be agreed parking plan, but, in order to be effective, greater clarity is needed on how the spatial strategy responds to the recognition in the WYG report that care needs to be taken to ensure that the proposed level of parking does not inadvertently encourage car use.

The plan does follow on from previous policy positions of constraining long stay parking within the central parking core, and that only the operational parking for non-residential development will be allowed. What the WYG report highlights is that, within this central area, there is already more focus on short-stay parking and long-stay car parks are already outside this zone.

The central parking core is defined in the IP1 area policies map and covers the town centre parts of the South East of Ipswich including Cardinal Park and the existing post office site. It also includes the Waterfront area and the University but does not include the areas to the west of the town, the Portman Road parking area, and doesn't include the Crown Street Car Park.

The area to the West of the town centre has predominantly been for long stay parking in association with the office uses and the railway station. Policy DM-22 states that no non-residential long stay car parks will be permitted. What is not clear is whether this is associated with the whole of the IP1 area or just the central parking area. The supporting text does provide some greater clarity on this that it is for central parking core but to avoid inadvertently encouraging car use and increasing congestion, the control of the supply of additional long-stay spaces must be extended to the whole IP1 area.

The IP1 insert map of the Local Plan does identify four points allocated for multi storey car parks: the mint quarter (short stay), Portman Rd (long stay), West End Road (long stay) and at site IP049 near the University (long stay).

The IP1 area insert map does not relate to the policies within the Local Plan document, particularly policy SP17 (town centre car parking). This policy does recognise the aims of supporting the economy, limiting congestion and encouraging use of modes of transport the policy then recognises the central parking core, for which policy DM-22 applies. SP17 then states which of the sites are allocated for multi storey car parks as: the mint quarter car park for short stay (IP048), West End Road (IP015) for long stay and Orwell Quay (IP049) also long stay. The Local Plan does not state that the old cattle market Portman Rd site is allocated, instead it says that the provision of the multi storey car park at West End Road will replace the on-site surface parking including the old cattle market if this is not replaced on site through development on a "like for like" basis.

This seems a logical approach because the old cattle market site is allocated for employment uses therefore the surface parking will be naturally displaced. The site sheet for IP051 does recognise the allocation policy SB05 and SP17.

SP5 refers to land allocated for used as specified in Table 3 and that IP051 will be redeveloped for office (80% of the site) and main town centre uses (20%), it then goes on to say numerically like for like replacement of existing long stay parking provision in this area, which can be assumed to be the site itself. This then means the local plan, in allocating the old Portman Road site for a multi storey long stay parking, is simply to replace the parking provision on the site that is being lost at either this site or at West End Road. The "like for like" replacement approach must be made clearer in the Local Plan otherwise this could undermine the restraint on the provision of long-stay spaces in the IP1 area.

Turning back to policy SB17, the emphasis of the policy is the provision of a long stay multi storey car park at West End Road as the preferred strategy for the replacement of existing long stay parking at Portman Rd (IP 051). If this was not the case, and the preferred strategy would be to replace on site, policy SP17 would be clearly setting this out but then also reflecting that the quantum of spaces would be for replacement reasons only.

Whilst there might be some additional provision during the period between a multi-storey car park being opened and a site being redeveloped, there is not a policy or other mechanism to make this period as short as possible. The County Council's concern is that the additional long-term spaces would be available over a long period of time, which would influence travel behaviour and undermine efforts to encourage people to walk, cycle or use passenger transport.

The continued restriction on operational parking within the central core is welcome. Whilst there is some definition of operational parking through reference to staff parking not being included (para.9.22.8), examples of what would be included would provide a positive position. This could include spaces for deliveries, visitor spaces and potentially spaces for staff who use private transport for visiting clients for example. The county council would welcome the opportunity to discuss how the approach to operational and staff parking within the IP1 area could be effective.

### Flooding and Water Management

#### *Strategic Flood Risk Assessment.*

The County Council has been working with the Borough Council and its consultants in preparing the Strategic Flood Risk Assessment (SFRA) and this collaborative working is appreciated. The SFRA is still currently in draft form and needs further work arising from data to be provided by the Environment Agency. The County Council, as the Lead Local Flood Authority, will assist the Borough in further developing this important piece of evidence, ensuring plan policies are



appropriately justified. Changes will be subject to ongoing work, however, in broad terms, the SFRA would benefit from setting out how development needs to respond to local circumstances and then the policies and site sheets to incorporate the overall results. Some of this information will likely be able to be transferred from the previous SFRA, as well as more location specific advice.

In order to ensure the plan is effective and consistent with national policy, subsequent changes to the plan may be required on completion of the SFRA.

#### *Policy DM4 Development and Flood Risk*

Policy DM4 is not sound because it is not consistent with national policy. NPPF paragraph 165 states "Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate."

Part a) of this policy states development will be approved where:

"It does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development and wherever practicable appropriate application of Sustainable Drainage Systems (SuDS)"

Planning practice guidance paragraphs 082 and 083 uses the term "practicable" in reference deciding the most appropriate type, operation and maintenance of SUDS on a site, rather than the principle of whether SUDS should be used on a site. The guidance makes a distinction between the terms "inappropriate" and "practicable". As such, the current wording of the policy is not consistent and could cause confusion.

The words "where practicable" should be removed from the policy.

#### Archaeology

##### *Site IP028b*

This part of the plan is not sound because it is not effective. The text states this site refers to Archaeological Character Zone 2, but the site lies within Archaeological Character Zone 1b, for the Historic Core, and is therefore of a higher sensitivity than indicated on the site sheet. This text should be corrected to ensure that heritage assets are appropriately identified and approached by development.

*The site lies on the edge of the River Gipping, within the likely former extent of the precinct of the medieval Franciscan friary (Greyfriars). There is potential for archaeological remains relating to the friary to survive on the site, as well as earlier occupation on the edge of lower lying marshy land. Within the western part of the site, marsh deposits have been identified, but human remains were recorded during construction of the eastern side of the existing buildings on the site. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). This site likely lies in the former extent of the town marsh. Palaeo-environmental assessment and mitigation for impacts on deeper deposits may be required. Deep excavations may encounter waterlogged features. Stratigraphy may be expected to be particularly deep in former streams and watercourses and waterlogged features are recorded in the Urban Archaeological Database.*

##### *Site sheet information*

While not strictly related to soundness, information on some site sheets could be updated to provide helpful information or improve the accuracy of the information. Amendments are suggested below:

IP011c, the separation of 011 into b and c means some further clarification is required. Amend to: ~~'The site lies... close to the grade II\* St Mary at Quay Church, contains two scheduled monuments and lies within an area of archaeological importance.'~~ Also amend: ~~'There is also limited potential for nationally important archaeological remains outside of the scheduled and previously scheduled areas. This is because much of the site has already been excavated in the past. Detailed early Pre-application discussion with Suffolk County Council Archaeological Service is advised and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design.'~~

IP354, the following information could be added:

*The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.*

IP355, the following information could be added:

*The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.*

ISPA 4.1, the following information could be added:

*These large greenfield areas have not been previously systematically investigated for archaeological remains. Archaeological evaluation should be undertaken to inform planning applications, comprising a combination of desk-based assessment, geophysical survey and an appropriate level of trial trenched archaeological evaluation (see character zone 2c in Archaeology and Development SPD).*

IP089

This site is a large area ~~in~~ *on the edge of the Anglo-Saxon and Medieval core and within the Area of Archaeological Importance (IPS 413).*

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I hope that these comments are helpful. Please contact me via the contact details at the top of this letter, if I or my colleagues can be of any assistance.

Yours faithfully,

Cameron Clow,  
Senior Planning and Growth Officer,  
Strategic Development,  
Growth, Highways and Infrastructure