

Item 01**Application No. IP/25/00005/FUL****Ward:** ALEXANDRA

Proposal: Public Realm Improvement works to Lloyds Avenue consisting of resurfacing works including increasing width of public footway and extended shared public space, installation of raised bed planters and landscaping, and existing cycle storage repositioned. Refurbishment of Lloyds Arch undercroft, including insertion of lights and cabling, digital screens/lightboxes, security cameras and radio equipment.

Address: Archway And Various Sites,Lloyds Avenue,

Applicant: Ipswich Borough Council

Agent: KLH Architects Ltd

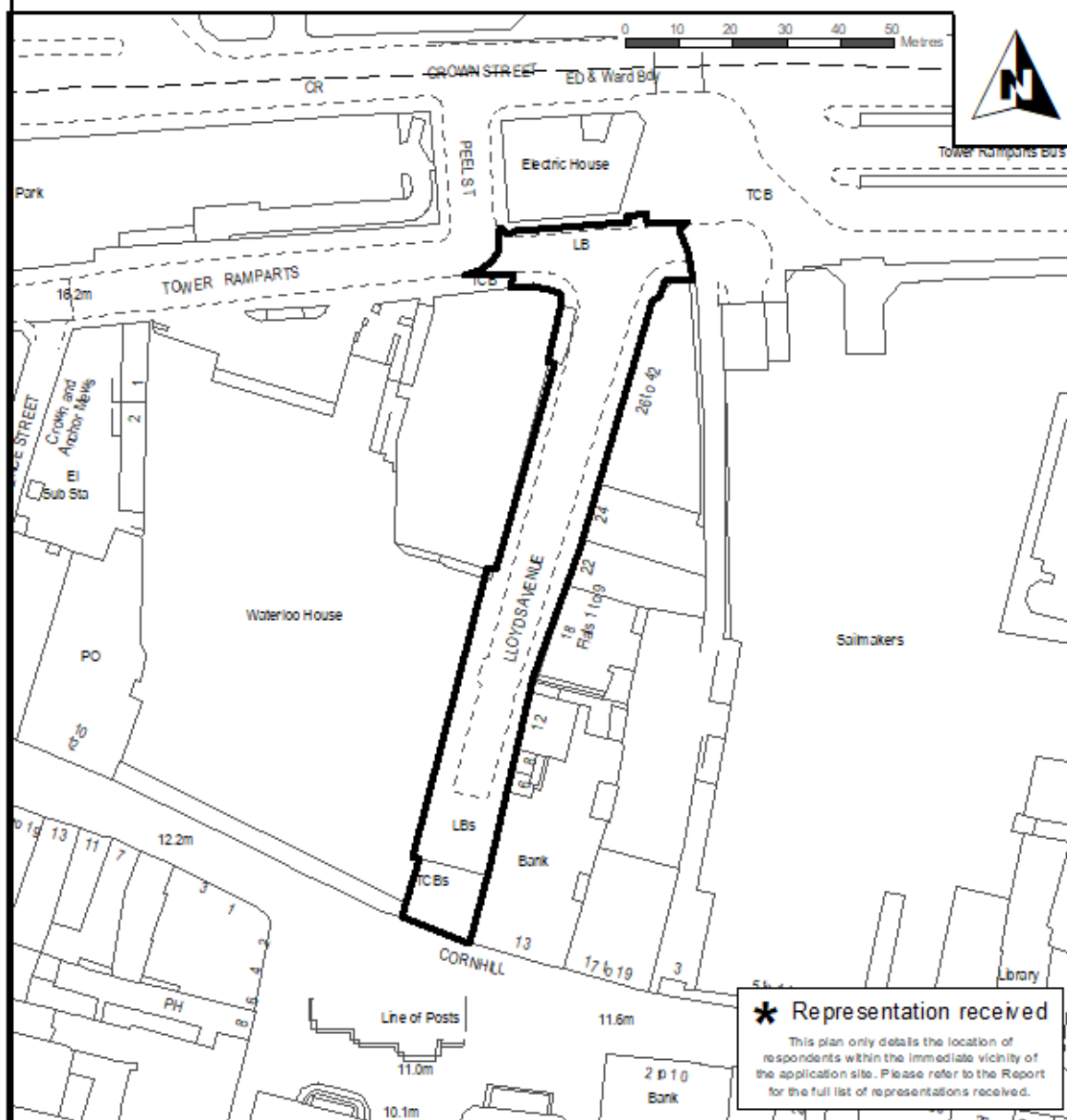
Item 02**Application No. IP/25/00007/LBC****Ward:** ALEXANDRA

Proposal: Refurbishment of Lloyds arch undercroft, including removing of service box, repositioning plaques, insertion of lights and cabling, digital screens/lightboxes, security cameras and radio equipment, and general redecoration.

Address: Archway And Various Sites,Lloyds Avenue,

Applicant: Ipswich Borough Council

Agent: KLH Architects Ltd



25/00005/FUL - Archway And Various Sites Lloyds Avenue

Recommendation IP/25/00005/FUL:

Grant planning permission subject to the following conditions (briefly) :-

1. Development to be in accordance with the approved drawings and the requirements of any succeeding conditions.
2. Submission of a Construction Management Plan (pre-commencement condition).
3. Before the development hereby approved is commenced, evidence shall be submitted to, and approved in writing by, the Local Planning Authority of the requisite Section 278 highway agreement, including the plans and final details of the proposal (and including details of materials).
4. Before the development hereby approved is commenced, planting management details are required to be submitted to, and approved by, the Local Planning Authority.
5. Before the development hereby approved is commenced, details of the bollards to be installed are to be submitted to and approved by the Local Planning Authority.
6. Prior to their installation, details of the planters and their seating shall be submitted to and approved in writing by the Local Planning Authority.
7. Prior to their installation, details of the cycle parking provision shall be submitted to and approved in writing by the Local Planning Authority. Prior to their installation, details of the final lighting scheme and control details are to be submitted to and approved in writing by the Local Planning Authority.

Recommendation IP/25/00007/LBC:

Grant listed building consent subject to the following conditions (briefly):-

1. The works hereby permitted shall be carried out in accordance with the approved drawings, documents, and correspondence, and the requirements of any succeeding conditions.
2. Methodologies and sample panels for the proposed redecoration of the columns, walls and ceiling of the archway shall be submitted to, inspected, and approved by the LPA prior to works commencing on the ceilings.
3. Full details, including manufacturer specification, and methodology for installation on site, for the proposed digital screens and light boxes shall be submitted to and approved in writing by the Local Planning Authority prior to their installation on site.
4. Full details of all new fixtures and fittings (including lighting, CCTV and radio equipment) shall be submitted to and approved in writing by the Local Planning Authority prior to their installation on site.
5. Full details of all permanent signage shall be submitted to and approved by the Local Planning Authority prior to installation on site.

These applications are referred to the Planning and Development Committee as the Council is both the applicant and the part owner of the site, in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992.

1. Proposal

- 1.1 Planning permission (reference 25/00005/FUL) is sought for *Public Realm Improvement works to Lloyds Avenue consisting of resurfacing works including increasing width of public footway and extended shared public space, installation of raised bed planters and landscaping, and existing cycle storage repositioned. Refurbishment of Lloyds Arch undercroft, including insertion of lights and cabling, digital screens/lightboxes, security cameras and radio equipment.*
- 1.2 The listed building consent application (reference 25/00007/LBC) seeks consent to *install new lighting, signage, digital screens and light boxes, new radio transmitter, receiver and security cameras, reposition a plaque and redecorate the walls and base of the columns within the Lloyds Archway.*

Description of the Site

- 1.3 Lloyds Avenue is a street connecting Tower Ramparts to the north with The Cornhill to the south. The street is made up of carriageway with turning circle, and taxi ranks on the east and west sides of the road. There is a footway either side with mixed uses running along the east side of the road. To the south sits a pedestrianised area leading on to Lloyds Arch and Avenue.
- 1.4 The Lloyds Building straddles Lloyds Avenue and fronts onto The Cornhill in Ipswich. It is a red brick and stone building designed by F G Cotman, an Ipswich architect, in 1889, in a free Jacobean style. This is the only building on Lloyds Avenue to be included within the Ipswich Central Conservation Area. The Lloyds Arch is a 20th century intervention to the public realm, creating a threshold /entrance to the Cornhill, a public square bordered by impressive, landmark Victorian buildings which include the town hall and post office - all Grade II Listed. This square is a focal point of the town, an important gathering space for large events.
- 1.5 Lloyds Arch is laid out as a two bay deep undercroft, with two central ionic order columns (with an ornamental egg and dart ovolo within the capitals), an ornate ceiling and deeply recessed, decorative arches and cornices around the arch walls. Waterloo House to the West of the arch has its colonnade connected through an opening in the under croft's South-western bay.

Detailed Description of Proposals

Lloyds Archway

- 1.6 A redundant service box and plaque shall be removed, and one plaque shall be relocated from the east to the west wall. One plaque will remain in-situ on the east wall under the proposed lightbox. A new plaque will join the relocated plaque on the west wall to mitigate for the covered up plaque on the east.
- 1.7 It is proposed to remove the four existing lights positioned on the east and west walls and install new lights in the same positions, but slightly higher. It is also proposed to install floor 'up lights' around the six columns.
- 1.8 On the eastern wall it is proposed to install an 'art installation' light box and a digital screen. A section of the proposed lighting box shows the projection and setting between the pilasters. The design is yet to be appointed and technically detailed, however the intention is that the depth will be set to avoid interaction with mouldings, and the overall projection will not protrude beyond the depth of these as to not compete visually. Mechanical fixings will allow a timber frame to be attached to the listed building, these will be minimised to facilitate a simple reversal, if necessary, in the future. The lightbox is to be designed to be fixed to this frame.
- 1.9 It is proposed to install a new radio transmitter, receiver, and security cameras to the north elevation, on the outer walls of the Lloyds building. It is also proposed to redecorate the walls and base of the columns.

Lloyds Avenue

- 1.10 The main elements of the proposal are to reduce the length of the Lloyds Avenue carriageway and realign the eastern edge of the carriageway to increase footway width on the eastern side. The section of ex-carriageway will be re-modelled to provide an extended pedestrian space.
- 1.11 The materials are proposed to be as follows:

Original footway outside front of shops:

Charcon – Woburn Original – Rustic
Marshalls Tegular Original Burnt Ochre

Extended footway outside front of shops:

Charcon – Woburn Original – Graphite
Marshall's – Tegular – Pennant Grey

Pedestrian / Public Realm and fixed seating area under catenary lighting:

Fairstone Granite (or similar) Setts

Footway elsewhere:

Charcon – Woburn Original – Graphite.

- 1.12 5no. Bollards are proposed at the southern end of the reduced length carriageway and will be a mix of 3no. fixed and 2no. demountable according to most recent drawing. The demountable bollards would allow for controlled vehicular access. Kerb line changes; improved pedestrian crossing facilities; and a change to road lining and signing is proposed at the northern end where Lloyds Avenue meets Tower Ramparts and Peel Street.
- 1.13 Presently Lloyds Avenue provides a taxi rank on both sides. The taxi rank area on the eastern side of the road will be removed. One rank will be retained on the western side with carriageway space being allocated to 10 taxi spaces and 1 space with a dual delivery/loading bay and taxi space use.
- 1.14 The dual space is at the back of the taxi queue, so the space will be available for delivery/loading use unless there are more than 10 taxis waiting.
- 1.15 An area for vehicle turning at the southern end has been provided. Tracking plans show the ability to maneuver vehicles in the relocated turning space, to the satisfaction of the Local Highway Authority.
- 1.16 Colour and material changes are proposed on the eastern footway and these areas will encourage an active frontage (shown as the shaded pink area in the plans). The boundary between the active frontage area (probably seating and tables) and the part of the footway where pedestrians will have clear passage is further demarcated by planters. The pedestrian movement part of the footway tapers from its widest part at the northern end to its narrowest point adjacent to the Three Wise Monkeys. At its narrowest point the footway would be 4.8m total width, with a 2m effective width on the carriageway side of the demarcating planter, and 1.6m on the side of the planter closest to the building frontage.
- 1.17 The width of the eastern side footway of Lloyds Ave will be increased by realigning the kerb line.
- 1.18 There are five points where rainwater down pipes from buildings are connected to drainpipes that cross under the footway allowing rainwater to flow onto the low point of the existing carriageway. Existing pipes will connect to a new drainage channel that will run south to connect to the highway drainage system.
- 1.19 At the northern end of Lloyds Avenue works are proposed to increase the width of the footway on the western side by moving the junction kerb line out. Build-outs on both sides of Tower Ramparts will reduce the carriageway to single vehicle width which will be ramped to allow a level surface pedestrian crossing point.
- 1.20 Give way arrangements at Peel Street will be changed with new road markings as advice from a Road Safety Audit.
- 1.21 8 on-street cycle hoops are to be removed and reprovioned.
- 1.22 Changes are proposed to the existing street lighting and that new street lighting will be suspended from posts (catenary lighting).
- 1.23 The applications have been submitted with the following documents:-

Towns Fund Lloyds Avenue CCTV Plan 2024 pages 1-3

Nola Hoop Bike Stand (a specification sheet)

Air Quality Exposure Assessment.

Zero Lumo Catenary Lighting image (received 10.02.25)

Post Mountable Hooded Litter Bin 42L technical specification document (received 10.02.25)

101-P1 Vehicle Tracking Analysis Sheet 2 of 2 (dated Nov 2024) (received 10.02.25)

100-P1 Vehicle Tracking Analysis Sheet 1 of 2 (dated Nov 2024) (received 10.02.25)

06117.00-KLH-XX-00-DR-A-1500 Rev P02 Proposed Raised Bed Planter Details (dated 19.12.24) (received 10.02.25).

23.5437.01 Rev A Soft Landscape Proposals (dated 25.10.24) (received 10.02.25)

2. Background

2.1. The site is Lloyd's Avenue and the Lloyd's Archway, the latter being part of listed building no.13, Cornhill. The southernmost part of the site, under the Archway, falls within the Central Conservation Area. The development proposes public realm improvements including footway widening, public seating and planting, catenary lighting, lightboxes under the archway, and digital board. New surfacing is proposed to differentiate the different spaces along the Avenue, encouraging active spaces. Recent and notable planning history in the area includes the 2017 applications and permissions for the public realm works of Cornhill area (17/00235/FPI3); a change of use from restaurant and care to retail shop and bar at no.38 (15/00830/FUL); applications and permission at 22 Lloyds Avenue for installation of a shop front (18/00539/FUL); and the installation of window display and window vinyls at 12, 13-15 Cornhill (13/00102/ADV). The Mecca Bingo site to the north of the proposed site is allocated for retail use under policy SP28 (reference IP347).

3. Consultations

3.1 Public and statutory consultation was undertaken between 15th January 2025 and 11th February 2025. 47 properties were notified of the application, in addition to a press notification and a site notice. The application was advertised on the Council's website in accordance with the Ipswich Statement of Community Involvement 2024.

3.2 Comments that were received are summarised below. Officers would like to draw attention to paragraph 5.40-5.43 of this report for a bespoke response to the comments raised.

3.3 Suffolk Constabulary (and Counter Terrorism Unit)

- Encourage consideration of Anti-social behaviour risks resultant from the planters, planting, and seating.
- Support the inclusion of CCTV but suggest that vertical and light emanating features do not interfere with CCTV.
- Concerns that pavement licencing may conflict with CCTV coverage or encourage ASB, though understood to be managed at licencing stage.
- Recommend that power supply is only accessible to authorised users.
- Anti-graffiti paint is recommended.
- Lighting ought to be in accordance with BS 5489-1:2020.
- Recommend secured by design cycle parking facilities.
- Hostile Vehicle Mitigation measures and standards should be employed.
- Digital features should be Secure Connected Device accredited.
- Recommendations made for construction phase site security.

Suffolk Constabulary does not object to this application, but does strongly request that any seating included in the proposal is capable of being removed when not in use if required to avoid generating a location for ASB.

3.4 Suffolk County Council Local Highway Authority (original comments)

- All proposed works are within Highway Maintainable at Public Expense and therefore subject to full s278 Agreement regarding design details, specifications and materials.

- Recommend vehicle tracking plans shows vehicles can turn in the designated turning circle, including when spaces are occupied.
- Concern raised as to footway tapering leading to unacceptable pinchpoints widths, exacerbated by active frontage areas.
- Clarification requested regarding maintenance of the planters.
- Details required of kerb upstands.
- Details required of surface water drainage, including details of utility assets.
- Details required of intended Traffic Regulation Orders, and any TRO's to be managed by IBC.
- Details of cycle hoops required.
- Details of materials, edge materials and details, and tree species required.
- Details required of lighting as concerns of conflict with surface water drainage infrastructure.
- Details regarding bollards are required.

3.5 Suffolk County Council Local Highway Authority (comments on revised drawings)

- Matters raised previously (above) have been addressed. No further response aside from that the applicant shall need to enter into a legal agreement under Section 278 of the Highways Act 1980.

3.6 IBC Conservation Officer:

- Conservation officer is the case officer for the listed building consent application- see main report for assessment.

3.7 IBC Urban Design:

- No design objections to public realm or installation proposals.

3.8 Conservation and Design Advisory Panel (06.03.25)

- Concerns regarding use of setts for proposed plaza
- Lack of natural materials
- Concerns the lack of sunlight may deter use of outdoor seating
- Surface treatments must be appropriate, ensuring stability and usability.
- Light box may be overly dominating in a Conservation Area, and in winter
- Clarity sought on exact purpose to justify such a large illuminated display
- Seating area materials should match Cornhill for cohesive appearance
- Narrowing effect of archway looks awkward – better transition of materials could improve this.
- One member of the panel encouraged contrasting materials for distinction.
- One member stated there is evidence of a large tree surviving adjacent to the Post Office/Botanist.
- Concern large trees would not survive in planters.
- Concerns over vandalism; a strict maintenance and watering regime needed.

Recommendation:

- Materials should align with Cornhill for cohesion.
- Members unconvinced the lightbox may overpower the conservation area.
- Condition should be imposed regarding landscaping and species selection.

3.9 Representations:

3.10 One received on listed building consent application 25/00007/LBC commenting upon the proposals:

1. Jane Riley, 19 Weymouth Road, Kerseys, Ipswich, received 27.01.25

Issues raised:

- Any redesign of lighting etc should incorporate and consider the ability of birds in particular pigeons to avoid them sitting or nesting on the ledges or fittings.

3.11 Two received on Planning application 25/00005/FUL objecting to the proposals:

1. Mr S Ali, Taxi Alliance, received by email on 14.02.25
2. Mr L O'Brien, received by email on 18.02.2025

Issues raised:

- Reduction in taxi spaces, contrary to need.
- Restricts space for taxi manoeuvring, leading to traffic congestion at peak times; and including conflict between taxi's and other users such as market deliveries.
- Loss of flattest surface at the southern point of Lloyds Avenue, for disability access (pick up / drop off). Stated to be contrary to The Equality Act.
- Increased pedestrianised space to the south results in loss of flat part of Lloyds Avenue, making it more difficult for disabled individuals to use taxis, as would need to climb the gradient of Lloyds Avenue.
- Loss of historic and well known taxi rank.
- Loss of taxi rank leading to public safety risks where individuals are without a taxi for longer periods of time.
- No specified and suitable relocation of lost spaces proposed.
- Lloyds Avenue is a wind tunnel, discouraging anticipated public realm use and meaning money would be better used elsewhere.

In addition, and received later on 03.03.25:

- Limited light reaching landscaping / planting due to tall buildings surrounding.
- Extended footpath leads to loss of privacy for other businesses and residential flats.
- Noise pollution upon current occupants and businesses.
- Out of character with existing property.
- Street / shop becomes overdeveloped due to extended footpath
- Impacts highway safety.
- Alternative schemes more appropriate e.g. Ipswich Ministry to Tower Street; shouldn't have two separate gateways miles apart under Greener Ipswich.

4. **Policy**

4.1. National Planning Policy

National Planning Policy Framework (2024)
National Planning Practice Guidance

4.2. Local Planning Policy

Ipswich Local Plan, incorporating the Core Strategy and Policies Development Plan Document (DPD) Review, and the Site Allocations and Policies (Incorporating IP-One Area Action Plan (AAP)) DPD Review (2022)

Policies:

CS1 (Sustainable Development)
CS2 (The Location and Nature of Development)
C3 (IP-One Area Action Plan)
CS5 (Improving Accessibility)
CS14 (Retail Development and Main Town Centre Uses)
CS20 (Key Transport Proposals)
DM3 (Air Quality)

DM4 (Development and Flood Risk)
DM8 (The Natural Environment)
DM9 (Protection of Trees and Hedgerows)
DM12 (Design and Character)
DM13 (Built Heritage and Conservation)
DM18 (Amenity)
DM21 (Transport and Access in New Developments)
DM22 (Car and Cycle Parking in New Development)
DM27 (The Central Shopping Area)
DM28 (Arts, Culture and Tourism)
DM29 (The Evening and Night-time Economy)

4.3. Site Allocations and Policies DPD Review (2022)

SP28 – Site Allocation IP347 – Mecca Bingo (650sqm net) (Delivering new retail investment in town centres can be challenging in this economic climate. The Mecca Bingo site, Westgate site and west side of the Mint Quarter are identified as a key opportunities to achieve new development, as they are located in close proximity to the existing retail core and would build upon the existing well-functioning retail centre).

4.4. Other Planning Guidance

Cycling Strategy SPD (2016)
Public Open Space SPD (2017)
Ipswich Town Centre and Waterfront Public Realm Strategy (2019)
Low Emissions SPD (2021)
Development and Flood Risk SPD (2022)

5. Planning Assessment

Principle of Development

- 5.1. The National Planning Policy Framework (2024) seeks to ensure the vitality of town centres (s.7); promote healthy communities which are encouraged to walk and cycle (s.8), promote sustainable transport through promotion of walking and cycling opportunities (s.9) whilst achieving well-designed places (s.12) and conserving the historic environment (s.16).
- 5.2. Local Plan Policy CS1 acknowledges and requires development to be sustainable as defined by the NPPF 2024 in terms of economic, social, and environmental sustainability. CS2 seeks high quality architecture and urban design and which enhances the public realm; CS3 promotes tree-planting and urban greening schemes, mindful of the ecological network, to improve the street scene and permeability for wildlife throughout the Town Centre; CS5 states the Council will work with partners to promote the inclusive and age-friendly design of buildings, public spaces, highways and transport infrastructure; CS14 states the Council will promote high quality investment and development in Ipswich Central Shopping Area, to maintain and enhance its attraction and market share, and strengthen its regional role; CS20 seeks to enhancing cycling and walking infrastructure and state that the Council will support further measures to facilitate cycling and walking in the Borough, including prioritising pedestrians and cyclists in Ipswich Town Centre.
- 5.3. The scheme is immediately adjacent to the allocated site IP347 of SP28 (Mecca Bingo) where increased retail investment is proposed.
- 5.4. The current scheme includes traffic calming measures across Tower Ramparts from Peel Street and the Tower Ramparts Transport Hub by way of raised table crossing points to improve pedestrian connectivity with Lloyds Avenue and the Town Centre beyond. There will be retainment of taxi ranks on the west side of Lloyds Avenue. Footway widening on the east side of Lloyds Avenue with flexible

space for active shop frontages, designated via a material change to the footway and siting of planters. An increased pedestrianised area with urban realm improvements such as planters with embedded seating, festoon lighting, and contemporary aesthetic cycle parking, leading to the Lloyds Avenue Arch with lightbox and digital board adjacent to the site of the Ipswich Market.

- 5.5. Officers consider the proposals will encourage a modal shift towards sustainable travel options by making a more attractive thoroughfare and destination point. Officers consider the proposals will encourage footfall along the Avenue, improving vitality and improving the attractiveness of sites such as IP347 (Mecca Bingo) and the currently unoccupied and unallocated former Debenhams site. Officers therefore consider the principle of the development to accord with the principles of the Local Plan and the NPPF 2024.
- 5.6. The improved connectivity between transport hub and taxi rank and the Town Centre, combined with contemporary drainage systems such as the proposed v-channels within the widened pedestrian footways, and soft landscaping / planters means the scheme; and contribution to the vitality of the area leads Officers to hold the view the proposals are an example of sustainable development compliant with policy DM1.
- 5.7. Officers consider the combination of enhancing the north-south route into the Town Centre including additional footway space for flexible active frontage use for shops, cafes, and bars, within the Central Shopping Area is supported by policies DM27 and DM29 which both aim to drive activity towards the Town Centre.
- 5.8. In Officers' view, the inclusion of potential art and similar through the lightbox installation brings the benefits sought by policy DM28 into the scheme, which states new facilities for arts, culture or tourism including accommodation, will be supported where they are focused within the Town Centre boundary or within the Waterfront area.

Design and Layout

- 5.9. Section 12 of the NPPF 2024 seeks the creation of high quality, beautiful and sustainable buildings and place and states it is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. The NPPF 2024 goes on to state development should function well and add to the quality of the area over the lifetime of the development; be visually attractive as a result of good architecture, layout; and appropriate and effective landscaping; be sympathetic to local character and history; maintain a strong sense of place; and promote health and well-being.
- 5.10. Policy DM12 (Design and Character) states new development should include useable public spaces for all (including pedestrians, cyclists and people with disabilities) that are easily understood and easy to pass through; and ensuring good public realm design that enhances the streetscape and protects and reinforces a sense of place, through the appropriate use of public art, bespoke paving, street furniture and soft landscaping.
- 5.11. Officers consider the raised table crossing, footway widening, and the extended shared public space with managed green spaces, complete with cycle parking, to be an enhancement to the streetscape along Lloyds Avenue and to provide a sense of place within what is currently a thoroughfare only. The inclusion of lightboxes and digital screen under the Lloyds Archway, and soft landscaping (planting) and seating, will reinforce a sense of place and turn Lloyds Avenue and the associated public space extension into a destination. Officers consider the pavement material changes and lighting across the public space will provide legibility and identity of the street. The location of planters along the centre of the extended footway on the east is understood to be for purposes of further denoting the flexible active frontage spaces (albeit specific locations of such planters may vary according to highways effective width requirements). Officers consider the location of bollards between carriageway and pedestrianised space a legible and sensible layout choice, which allows cycles to proceed on to the cycle spaces

beyond (whether via designation of the space as shared use or requiring dismounting of cycles for a short distance, subject to the project team and / or Highway Authority decisions at later stages in the project).

- 5.12. Some information on materials to be used was provided as part of the submission, however, following the initial SCC Highways consultation response, greater detail was submitted as part of a set of 'Setting Out Plans.' The setting out plans show the proposed material palettes in detail (as listed above in paragraph 1.12 and repeated below):

The materials are proposed to be as follows:

Original footway outside front of shops:

Charcon – Woburn Original – Rustic

Marshalls Tegular Original Burnt Ochre

Extended footway outside front of shops:

Charcon – Woburn Original – Graphite

Marshalls – Tegular – Pennant Grey

Pedestrian / Public Realm and fixed seating area under catenary lighting:

Fairstone Granite (or similar) Setts

Footway elsewhere:

Charcon – Woburn Original – Graphite.

- 5.13. The materials are considered by Officers to be of high quality and representative of contemporary urban design schemes. Officers note the Conservation and Design Panel's concerns regarding the use of granite setts however, the granite setts are within the fixed seating area and not proposed for the areas of active frontages to the north of Lloyds Avenue where there would indeed be the risk of chair legs falling between the granite setts. That being stated, Officers strongly encourage the applicant to ensure that the granite setts are installed in such a way as to be inclusive to all abilities, and not prejudicial to wheelchairs, pushchairs and similar which may find wheels caught within the setts and unbalanced as a result. This can be included as an informative of any planning permission. The Conservation and Design Panel also raised concerns of linking materials with Cornhill Exchange. Planning Officers consider the material palette, being of contemporary material, to find a good balance between a link with the Cornhill Exchange and its own identity.

- 5.14. For the reasons stated above, Officers consider the design and layout of the proposals to comply with policy DM12 and section 12 of the NPPF 2024.

Impacts upon Heritage Assets and Conservation

- 5.15. Sections 16(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that, when a local planning authority considers whether to grant listed building consent it must have "special regard" to the desirability of preserving the building, its setting and any special architectural or historic features.
- 5.16. Policy DM13 states that proposals for new development must consider the impacts on the historic built environment which makes Ipswich such a distinctive town, seek opportunities for enhancement of the town's heritage, and respond to the historic pattern of development and character of the area and comply with the requirements of the NPPF.
- 5.17. Chapter 16 of the NPPF states that – In determining applications, local planning authorities should take account of a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the

desirability of new development making a positive contribution to local character and distinctiveness (paragraph 203).

- 5.18. The proposed works have been sensitively designed to sit within the architectural detailing of the archway; the proposed light box and digital screens to be installed will sit well within the recess of the arches and columns.
- 5.19. The refurbishment of the lighting, CCTV, radio equipment and redecoration are welcomed as these shall enhance the appearance and experience of the public space.
- 5.20. The works are essentially reversible; the light box and digital screens shall be fixed to the listed building via a timber frame, which shall ensure the fixings into the fabric of the building are minimal, and could be made good in the future if necessary.
- 5.21. To summarise, it is considered that the proposed works will not cause harm to the historic or architectural character of the listed building, and shall enhance the viability and sustainability of the heritage asset. The proposals are in accordance with Policy DM13 of the adopted Local Plan and consistent with the NPPF 2024.

Amenity

- 5.22. Section 12 paragraph 135(f) of the NPPF 2024 states development should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.23. Policy DM18 states the Council will 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. The factors considered under the policy include: overbearing impact and sense of enclosure; sunlight, daylight, overshadowing and artificial light levels; noise and vibration levels; odour, fumes, dust and ventilation; contamination; and visual privacy and overlooking.
- 5.24. Based on *Preliminary detail specifications* and *Elevation* drawings, the structures to be installed include 1.5m(l) x 1.2m(w) x 1m(h) pressed metal planters; circa 0.6m(h) above ground tree curved and circular planters with seating; a 2m(h) wayfinder totem, approx. 13no. 900mm(h) hooped bicycle stands; 1000mm(h) bollards; 10no. slender 6.3m(h) vertical lighting supports, with lighting chains to be circa 5.3m(h) ground clearance. Officers consider the street furniture and vertical features to produce a positive sense of enclosure in interests of creating a destination point as well as attractive through route between transport hubs and Town Centre to be acceptable. Artificial Light levels will be subject to further technical details, and forms part of the recommended conditions, however the artificial lighting is supported in-principle owing to its siting towards the southern end of the site where the topography causes the lighting to fall below the sill levels of the first-floor residential units of the upper floors of the Blackberry Clinic building (on the east side of Lloyd's Avenue approx. 41m north of the Archway), and across the first floor windows of more southern premises which Officers understand to be office use only.
- 5.25. Officers consider risks of dust, noise, vibration, odour, and fumes to predominantly apply during the construction phase rather than operational phase of the development, and therefore a construction environment management plan has been conditioned to ensure minimal impacts during the construction phase. The construction environment management plan will also enable an opportunity to manage any construction phase impacts upon the adjacent air quality management area.
- 5.26. Officers consider the proposals will improve a public space, leading to increased footfall with active frontages overlooked by some residential units improves the amenity of the area generally.
- 5.27. Officers are aware that due regard has to be given to the Equality Act 2010 in decision making. Under section 149 of the act, all public bodies are required in exercising their functions to eliminate

discrimination, advance equality of opportunity and foster good relations. The "protected characteristics" to which the act applies include age, race, religion or belief, sex, sexual orientation, gender reassignment, disability, pregnancy and maternity.

- 5.28. The applicant has informed officers that consideration of disability matters have taken place prior to the submission of the planning application, and discussions held with groups such as Ipswich Disabled Advice Bureau, Suffolk Sight and Suffolk Guide Dog Forum.
- 5.29. Public representations state that taxis currently pick up customers with disabilities at the flattest part of Lloyd's Avenue (the southern most point of the highway). This area is beyond the turning area of the existing road, is bounded by double yellow lines, and the dropped kerb element is restricted by existing bollards and rough-set surface treatment. The proposal seeks to push the turning area further north and extend the public realm and seating area over the flattest part of Lloyd's Avenue. The plans do indeed seek to utilise the flattest ground level for public realm and seating however, there will remain a turning area at the northernmost point of the flattest stretch of land (albeit subject to a slight incline). The current on/off boarding of customers at the flattest part of the road is, from the presence of the current location of the turning point, an unintended use of what Officers consider to be designed as an access point for service, delivery, and market vehicles into the Cornhill Exchange area beyond the arch. For this reason, Officers consider that limited weight can be given to a concern which currently necessitates unintended vehicular movements; either turning within the carriageway beyond the allocated turning point, or turning and reversing towards the flattest part of the highway. Indeed, the proposed plans would take public realm up to the turning point and, if on/off boarding were carried out within the proposed turning point (before the steepest gradient of Lloyd's Avenue begins), this would at least be in accordance with the turning function of the proposed layout. The removal of an unintended pick-up/drop-off point is not considered to warrant a refusal of planning permission, as this facility would be retained, albeit further up Lloyds Avenue. There are also alternative places for on/off boarding of customers within the town.
- 5.30. Public representation raised concerns of a wind tunnel and shade caused by buildings discouraging use of the proposed seating areas and active frontages. However, Officers consider this is a choice for the market and applicant to consider, and not reason to refuse the application. The key consideration is that the development, being the agent of change for the area, does not introduce amenity impacts. Officers do not consider that the proposals introduce any amenity impacts.
- 5.31. Officers do not consider that the increased footway width will affect privacy. The highway is existing and the increased footway is to the front of ground floor shop frontages designed to attract footfall.
- 5.32. Officers do not consider that the scheme constitutes over-development. The openness of the highway (including Lloyd's Avenue carriageway and the footways leading under the arch) is retained by considerately located and appropriately scaled planters and seating, allowing sufficient and open circulation space between.
- 5.33. Regarding concerns raised of noise impacts, any residential units adjacent to the site, notably those at first floor and above along Lloyd's Avenue, are town centre residential units which can reasonably expect a more active environment with commensurate noise as a result.
- 5.34. Officers conclude that the proposal is compliant with paragraph 135(f) of the NPPF 2024 and policy DM18 of the Local Plan.

Transport and Access Matters

- 5.35. Section 9 paragraph 109(e) of the NPPF 2024 states proposals should identify and pursue opportunities to promote walking, cycling and public transport use. Policy DM21 of the Local Plan seeks to prioritise options for travel by foot, bicycle, and public transport; enhance public rights of way facilities and routes; and ensure safe and suitable access for all users. Policy DM22 seeks secure and convenient facilities and create a safe and attractive environment.

- 5.36. The proposals include a variety of alterations to the public highway, including footway widening, kerb re-alignment, raised tables for enhanced crossing provision, retainment of a turning circle for taxis. The proposals seek to enhance pedestrian accessibility, provide cycle parking provision, and space for active frontages; together encouraging a modal shift towards sustainable transport and behaviour.
- 5.37. Public representations have been critical of the loss of taxi provision. Planning Officers consider that matters of provision and need are matters for the applicant to consider and may be something considered through the Traffic Regulation Order process.
- 5.38. The specific details of the alterations to the highway will be subject to Section 278 agreement with Suffolk County Council and the applicant, separate to this planning permission. However, with the proposals encouraging modal shift towards sustainable transport options by way of improved pedestrian north-south links; connectivity with transport hubs and taxi ranks; and cycle provision and parking, the proposals are considered, in planning terms, to comply with policies DM21 and DM22 of the Local Plan; and actively promote sustainable transport in accordance with section 9 of the NPPF 2024.

Landscaping and Biodiversity Matters

- 5.39. The development does not impact a priority habitat and impacts less than 25m² of on-site habitat, and is able to claim an exemption from BNG under the de minimis designation; however, planting is proposed as part of the scheme. Considerations have been made to ensure sufficient soil volume has been allowed to ensure the viability and survival of the bed planter trees proposed. In response to concerns as to the resilience of the planting in the shaded area of Lloyd's Avenue, the planting is specified to be native species which should cope to the site conditions. The inclusion of planting into a currently hard landscape-only environment is deemed by Officers to be an improvement and compliant with policies DM8 and DM9 in terms of enhancing opportunities for biodiversity and increasing tree canopy coverage respectively. As such, Officers consider the proposal compliant with Section 15 of the NPPF 2024 also.

Air Quality

- 5.40. The northernmost end of the scheme, where Lloyds Avenue meets Tower Ramparts falls within the 20m buffer zone of the Air Quality Management Area (2). An Air Quality Exposure Assessment was submitted as part of the application however did not acknowledge that the site is adjacent to an Air Quality Management Area. However, the works within this area are the raised tables and tactile paving works, rather than the footway widening or the increased length of the pedestrianised space. As such, Officers consider the proposals to introduce little risk of relevant exposure of air pollution to sensitive receptors owing to the gathering spaces being outside the poorer air quality area. In terms of increasing impacts to the existing environment, the highway construction works are limited in scale and for a limited period of time only and are, in Officers opinion, outweighed by the modal shift encouragement of enhanced crossing points. Furthermore, the conditioned construction environment management plan will provide opportunity to minimise construction phase impacts upon the air quality management area. Officers are therefore content that the proposals comply with policy DM3 which seeks to avoid negative impacts to existing air quality levels.

Flood Risk

- 5.41. The scheme does not seek to increase hard landscaping. The scheme will include v-channel drainage to manage surface water along the widened footway, leading to existing drainage provision. Carriageway drainage will fall to existing drains also. Planters will be fixed to the ground (though Officers understand in such a way as to be detached and relocated if required). The proposal is therefore considered by Officers to not increase flood risk. Specific details of surface water management would fall within the final Section 278 highway agreement and is beyond the scope of this planning assessment. Officers are therefore content to state that the proposals comply with policy DM4 of the Local Plan and section 14 of the NPPF 2024.

Consultation Response Comments

- 5.42. Many of the consultation responses from the Highway Authority have been responded to by the applicant and shall be subject to formal s278 agreements with the Highway Authority. It is acknowledged that Section 17 of the Crime and Disorder Act 1998 places a duty on authorities to exercise its various functions with due regard to the likely effect of those function on, and the need to do all that it reasonably can to prevent crime and disorder in its area. Suffolk Constabulary seek details which are the purview of technical design stages of a given scheme. Planning Officers consider that the level of detail sought after is either best placed to be managed as part of the section 278 agreement process with the Highway Authority or, owing to the sensitive and confidential nature of concerns raised by the Suffolk Constabulary, best managed through confidential condition discharges. Planning Officers consider there is sufficient material submitted as part of the planning application to reach a planning decision (including the addition s278 material submitted on 10.02.25); with a view to link with the s278 agreement details and resolve the security matters through condition discharges.
- 5.43. Matters raised by the Conservation and Design Panel such as funding streams are beyond the scope of the planning assessment. However, with regards to planting, a management schedule has been requested as a condition. Governance of the material displayed on the installation would also be separate to the planning system. Should the lightboxes or digital boards be used for advertisements, this would require separate advertisement consent.
- 5.44. Regarding risks of increased Anti-Social behavior, again it is acknowledged that Section 17 of the Crime and Disorder Act 1998 places a duty on authorities to exercise its various functions with due regard to the likely effect of those function on, and the need to do all that it reasonably can to prevent crime and disorder in its area. Officer's consider the site to be well overlooking, and the active frontages and anticipated increased use of the semi-public frontages the widened footway produces will increase natural surveillance and counterbalance any increased risks of anti-social behavior resultant from the destination points created by the scheme.
- 5.45. The seating proposed as part of the landscaping is to be fixed. The seating that would be encouraged through the widened, active footway would be subject to separate licences which, as Planning Officers understand, would usually require being taken back into their respective units out of hours.
- 5.46. Matters regarding alternative sites for a Gateway such as that proposed are beyond the planning assessment and are considerations for the applicant. The planning decision making process is only able to consider the plans before them as submitted by an applicant; not to suggest alternative sites and schemes.
- 5.47. In terms of Governance of the contents of the lightbox, IBC are the applicant and owner. Planning Officers cannot condition what is to be displayed on the lightbox, only that it must not be an advertisement. Use for advertisements would require alternative advertisement consent.

6. Planning Balance / Conclusion

- 6.1. **IP/25/00005/FUL** – The proposed works to widen the footway to accommodate active frontages; extend the pedestrianised area to the south of Lloyd's Avenue; and install lightbox; with ancillary seating and lighting throughout is considered by Officers to be an improvement to the urban realm in the interests of making both an attractive thoroughfare and destination point. The scheme continues to share the overall highway with other users, such as retainment of some taxi provision.
- 6.2. The proposals, subject to the application of conditions, would not be detrimental to the character, appearance or setting of the listed building, nor to the character and appearance of the Conservation Area to the south; and in Officer's opinion will improve the character and visual amenity of the Lloyd's Avenue generally. The proposal is therefore considered compliant with Local Plan policies CS1, CS2, CS3, CS5, CS14, CS20, DM3, DM4, DM8, DM9, DM12, DM13, DM18, DM21, DM22, DM27, DM28,

DM29 and the NPPF 2024; and in relation to chapter 16 of the NPPF 2024. It is recommended that planning permission is granted.

- 6.3. **IP/25/00007/LBC** - The proposed listed building works would enhance the viability and sustainability of the heritage asset without causing harm to the historic or architectural character of the listed building.
- 6.4. The proposals, subject to the application of conditions, would not be detrimental to the character, appearance or setting of the listed building and Conservation Area. The proposals would comply with Policy DM13, chapter 16 of the NPPF 2024, and sections 16(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is recommended that listed building consent is therefore granted.