

Consultation Statement for the Ipswich Local Plan Review 2018-2036

Regulation 22(c) Statement

June 2020



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1. Introduction

This document provides a summary of the consultation undertaken on the Ipswich Local Plan Review. It provides the information required under Regulation 22(c) of the Town and Country Planning (Local Planning) Regulation 2012. The document sets out:

- Which bodies and persons were invited to make representations under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.
- How those bodies were invited to make representations.
- A summary of the main issues raised in those representation received.
- How those representations have been taken into account.
- The number of representations made pursuant to Regulation 20 of the Town and Country Planning (Local Planning) Regulations 2012 and a summary of the main issues raised.

The consultation on the '**Issues and Options for the Ipswich Borough Local Plan Review**' marked the first stage of consultation on the new Local Plan under Regulation 18 and invited comments from statutory local plan consultees, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public. A 10-week consultation was undertaken between Friday 18 August and Monday 30 October 2017. In total 76 individuals and organisations responded to the consultation. Between them they made 711 comments.

The '**Ipswich Local Plan Review Preferred Options**' consultation under Regulation 18 invited comments from statutory local plan consultees, parish and town councils, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public. An 8-week consultation took place between Wednesday 16 January and Wednesday 13 March 2019. In total, 110 individuals and organisations responded to the consultation. Between them they made 600 comments. 413 of these comments were made on the Core Strategy and Policies DPD Review, 160 on the Site Allocations and Policies DPD and 12 on the Sustainability Appraisal and Habitat Regulations Assessment.

The '**Ipswich Local Plan Review Final Draft**' consultation under Regulation 19 invited comments from statutory local plan consultees, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public. The consultation lasted just over 6 weeks, beginning on Wednesday 12 January and ending on Monday 2 March 2020. In total 89 individuals and organisations made 497 representations between them.

2. Regulation 18 – Who was Consulted (Regulation 22(c)(i))

Issues and Options for the Ipswich Borough Local Plan Review and the Ipswich Local Plan Review Preferred Options consultations.

Specific, Statutory and general consultation bodies (by post)
Anglian Water Group (AWG Property Ltd)
British Gas (Lakeside)
BT Group plc
Copleston High School
DB Cargo Limited
Department for Transport (DFT)
EON UK Plc
Essex & Suffolk Water
Handford Hall Primary School
Headway Ipswich and East Suffolk
Health & Safety Executive (East Anglia) HSE local offices
Holywells High School
Hutchison 3G UK Ltd
Ipswich Academy (formerly Holywells High School)
Ipswich School
Ipswich Disabled Advice Bureau
Lambert Smith Hampton on behalf of NOMS/HM Prison Service
Murrayfield Primary School
Newcastle City Council
NPOWER
NTL UK
One-Ipswich
Opal Telecom
Orange Business Services
Orchard Street Health Centre
Public Health England - Midlands and east of England Regional Office
Smartest Energy
St Alban's Catholic High School
St John Ambulance
St Joseph's College
One Suffolk Sixth Form College
T-Mobile (UK) Ltd
Torch Communications Ltd
Vectone Services Ltd
Vodafone Limited
Witnesham Parochial Church Council

Specific, Statutory and general consultation bodies (by email)
Akenham Parish Council
Anglia Care Trust
Anglian Water
Babergh Mid Suffolk District Councils
Barnham Parish Council
Belstead Parish Council
Bramford Parish Council
Brightwell, Foxhall & Purdis Farm Parish Council
Broke Hall Community Primary School
BS Pension Fund Trustee Ltd
Cable and Wireless
Castle Hill Infant and Junior School
Chantry Academy
Claydon & Whitton Parish Council
Coal Authority
Colchester Hospital University NHS
Community Action Suffolk
Copdock & Washbrook Parish Council
Copleston High School
CTIL (on behalf of Vodafone and Telefónica)
Cycle Ipswich
Cycling UK
Dale Hall Community Primary School
Department for Communities and Local Government
Department for Education
East Anglian Wire Works
East of England LGA
Easton and Otley College
EDF Energy
EE
Environment Agency
Felixstowe Town Council
Felixstowe Coastal
Friston Parish Council
Great Bealings Parish Council
Great Yarmouth Borough Council
Halifax Primary School
Henley Parish Council
Highways England (Agency)
Hillside Primary and Nursery School
Historic England
Home Office
Homes England

Homes and Communities Agency (Formerly Homes England)
House of Commons
Hoxne and Eye
Iceni Projects Limited
Inland Waterways Association
Ipserve
Ipswich and Suffolk Council for Racial Equality
Ipswich Borough Council Councillors
Ipswich Borough Council Internal Departments
Ipswich Chamber of Commerce
Ipswich High School for Girls (Junior and Senior)
Ipswich Hospital NHS Trust
Ipswich Preparatory School
Ipswich School
Ipswich Wildlife Group
NHS England Midlands and East (East)
NHS Ipswich & East Suffolk Clinical Commissioning Group
Ipswich & East Suffolk CCG & West Suffolk CCG
Little Bealings Parish Council
Marine Management Organisation
MBNL (EE and Three)
Member of Parliament
MS Society - Ipswich
MLL Telecom Ltd
Morland Primary School
Nacton Parish Council
Natural England
Network Rail
NHS Property Services Ltd
Norfolk and Suffolk NHS Foundation Trust
Northgate High School
Office of Nuclear Regulation
Office of Rail and Road
Ormiston Endeavour Academy
Otley College of Agriculture and Horticulture
Parish Council Playford Village
Pinewood Parish Council
Police and Crime Commissioner for Suffolk
Railfuture
Ranelagh Primary School
Ravenswood Community Primary School
Rosehill Primary School
Rushmere Hall Primary School
Rushmere St Andrew Parish Council
Shopmobility

Sports England (East)
Springfield Infant School and Nursery
Springfield Junior School
Sprites Primary School
Sproughton Parish Council
St Alban's Catholic High School
West Suffolk/ Forest Heath District Council and St Edmundsbury Borough Council
St Helen's Primary School
St John's C of E Primary School
St Margaret's Primary School
St Mark's Catholic Primary School
St Matthew's C of E Primary School
St Pancras Catholic Primary School
Stoke High School
Suffolk Association of Local Councils
Suffolk Biodiversity Information Service
Suffolk Coastal and Waveney District Councils (East Suffolk)
Suffolk Coastal District Council (East Suffolk)
Suffolk Constabulary
Suffolk County Council Councillors
Suffolk County Council Internal Departments
Suffolk Fire and Rescue Service (Suffolk County Council)
Suffolk GP Federation - Woodbridge
Suffolk Mind
Suffolk New College
Swilland and Wivesham grouped Parish Council
The Northgate Foundation
The Oaks Community Primary School
The Planning Inspectorate
Theatres Trust
The Willows Primary School
Thomas Wolsey School
Three
Tuddenham St Martin Parish Council
UK Power Networks
University of Suffolk (UCS Campus)
Vodafone and O2
West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council)
Westbourne Academy
Westerfield Parish Council
Wherstead Parish Council
Whitehouse Community Primary School
Whitton Community Primary School
Wild Anglia Local Nature Partnership/New Anglia Local Enterprise Partnership
Willow Park Montessori Day Nursery

Wood Plc on behalf of National Grid

Individuals and organisations

Includes individuals, planning and estate agents, developers, land owners, schools, local businesses and others on the Ipswich Local Plan mail list.

3. Regulation 18 – How they were consulted (Regulation 22(c)(ii))

Public Exhibitions

Issues and Options for the Ipswich Borough Local Plan Review

Venue	Date	Time
Ipswich Town Hall, Pickwick Room	Saturday 30 th September 2017	11am – 3pm
Ipswich Town Hall, Pickwick Room	Tuesday 3 rd October 2017	11am – 3pm
Central Area Committee Ipswich Community Church	Wednesday 13 th September 2017	7pm – 9pm
South West Area Committee Stoke Green Baptist Church	Thursday 21 st September	6:30 – 8:30pm
South East Area Committee Murrayside Learning Centre	Wednesday 6 th September	7pm – 9pm
North West Area Committee St Raphael Club, Highfield Road	Thursday 14 th September	7pm – 9pm
North East Area Committee St John's Church	Thursday 19 th September	7:30 – 9:30pm

Ipswich Local Plan Review Preferred Options

Venue	Date	Time
Ipswich Town Hall, Pickwick Room	Saturday 26 th January 2019	10am – 4pm
Ipswich Town Hall, Pickwick Room	Thursday 14 th February 2019	10am – 4pm 5:30pm – 8pm
Central Area Committee Museum Street Methodist Church	Wednesday 9 th January 2019	7pm – 9pm
South West Area Committee Grafton House, Gipping Room	Thursday 10 th January 2019	6:30 – 8:30pm
South East Area Committee Alan Road Methodist Church	Wednesday 16 th January 2019	7pm – 9pm
North West Area Committee St Raphael Club, Highfield Road	Thursday 17 th January 2019	7pm – 9pm
North East Area Committee Ransomes Sports Pavillion, Sidegate Avenue	Thursday 24 th January 2019	7:30 – 9:30pm

Consultation documents and materials online and at exhibitions

Documents	Details
Core Strategy and Policies DPD Review Preferred Options (November 2018) + Tracked Change version	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Plan 1 (District and Local Centres), Plan 2 (Flood Risk), Plan 3 (Conservation Areas), Plan 4 (Area of Archaeological Importance including Scheduled Ancient Monuments), Plan 5 (Ipswich Ecological Network) and Plan 6 (Green Corridors) (November 2018)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Sheets (IP003 – IP348)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review Preferred Options (November 2018) + Tracked Change version	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Local Plan Policies Map (November 2018) Local Plan Policies Map IP-One Area Inset (November 2018)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Strategic Environment Assessment and Sustainability Appraisal (includes Non-Technical Summary) and Appendices A -E (January 2019)	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Habitats Regulations Assessment of the Ipswich Borough Local Plan at Preferred Options Stage (January 2019)	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Notices	Notices placed on the vicinity of every proposed site allocation
Draft Statement of Common Ground with the Ipswich Strategic Planning Area Authorities (November 2018) Issues and Options Consultation Statement (November 2018) Equality Impact Assessment Statement of Compliance with the Duty to Co-Operate	Evidence-based documents available for download online
Ipswich Garden Suburb (IGS) Housing Retail & Town Centre Air Quality, Transport & Green Infrastructure	Topic Papers available for download online

Economy	
Draft Strategic Housing & Economic Land Availability Assessment (SHELAA) and Site Map	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
GIS Online Service	Interactive mapping service available
Consultation Module Site	Interactive consultation system that enables those to register and comment online
Comments Form	PDF and word versions online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Letters/emails	Sent to contacts on the local plan mail list (including private individuals and statutory consultees) informing of consultation dates of exhibitions
Presentations at the Area Committees	Planning officers gave a talk outlining (on A1 boards) the main issues and facts in the Core Strategy and Site Allocations documents of the Local Plan
A4 Preferred Options "What is a Local Plan" leaflet	Available to take away at exhibitions
Ipswich Borough Council Social Media feeds	Regular notifications and opportunity to interact on Facebook and Twitter

Media and Publicity

Issues and Options for the Ipswich Borough Local Plan Review

The Council advertised the Issues and Options consultation in the Ipswich Star and East Anglian Daily Times local press on Wednesday 18th August 2017. Ipswich Borough Council hosted a dedicated web page from January to March that included downloadable comment forms. Those on the Ipswich Local Plan Mailing List were notified via letter and email and invited to make comments on the Preferred Options documents. Representations could also be submitted electronically on the consultation module site within the consultation period.

Twitter and Facebook pages ran for the duration of the consultation with regular bulletins on exhibition information and venue dates.

Appendices 4 – 7 demonstrate the Media and Publicity that were used throughout the consultation. Appendix 12 provides a full list of the representations and responses to the consultation.

Ipswich Local Plan Review Preferred Options

The Council advertised the Preferred Options Review consultation in the Ipswich Star and East Anglian Daily Times local press on Wednesday 16th January 2019. Ipswich Borough Council hosted a dedicated web page from January to March that included downloadable comment forms. Those on the Ipswich Local Plan Mailing List were notified via letter and email and invited to make comments on the Preferred Options documents. Representations could also be submitted electronically on the [consultation module site](#) within the consultation period.

Twitter and Facebook pages ran for the duration of the consultation with regular bulletins on exhibition information and venue dates.

Appendices 8 – 11 demonstrate the Media and Publicity that were used throughout the consultation.

4. Main Issues raised during Regulation 18 and how they were taken into account (Regulation 22(c)(iii and iv))

As detailed above, two consultations were undertaken under Regulation 18. The comments received during the Issues and Options for the Ipswich Borough Local Plan Review (August – October 2017) Consultation are summarised in Appendix 1. Appendix 1 also details how the Council took these comments into account during the preparation of the second Regulation 18 consultation, the First Draft Local Plan (January - March 2019). A summary of the comments received during the First Draft Local Plan consultation is found in Appendix 2 together with details on how the Council took these comments into account in preparing the Regulation 19 proposed submission version of the Local Plan, the Final Draft Local Plan (January 2020).

5. Main Issues in Representations made under Regulation 20 (Regulation 22 (c)(v))

A six-week consultation for the submission of representations was held between 15th January and 2nd March 2019. This final consultation prior to the submission for examination invited representations on soundness and legal compliance. Appendix 3 details who was consulted and how they were consulted at this stage.

In total, 89 individuals and organisations responded to the consultation, making 497 representations.

Document name	Respondents	Objectors	Support / Object			Totals
			Support	Object	Comment	
Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review - Final Draft	52	49	64	273	0	337
Ipswich Borough Council Local Plan Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review - Final Draft	61	58	15	121	0	137
Local Plan Policies Maps Final Draft	5	5	0	5	0	5
Final Draft Ipswich Local Plan 2018 - 2036 Sustainability Appraisal Report (SEA and SA)	4	3	1	10	0	11
Supporting Documents and PDFs for Download	3	2	1	7	0	8
Totals <i>(Total respondents & objectors only includes number of persons/ organisations. It does not double count where they have commented on more than one document)</i>	89	84	81	416	0	497

The following sections detail the main issues raised under each part of the Local Plan.

5.1 Core Strategy and Policies Development Plan Document Review

1. Part A – The Context

Chapter 2 – The Planning System

Main Issue	Representations
Main issue 1: Important we continue to be consulted in relation to emerging Neighbourhood Development Plans in order to work with local communities to deliver and maintain sustainable healthcare.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26230)
Main issue 2: Support the spatial strategy for continued urban regeneration in central Ipswich, IGS and Humber Doucy Lane.	Babergh and Mid Suffolk (Rep ID: 26463)

Chapter 3 – The Local Enterprise Partnership

No Main Issues.

Chapter 4 – The Duty to Co-operate

Main Issue	Representations
Main issue 1: Important to remember that improved or newly created infrastructure, alone, will not fully mitigate the impact of development growth. Resource and revenue implications provide a very significant risk to the delivery of primary care services and we should continue to work together to identify ways in which sustainable health care services can be delivered and how development can contribute to healthy communities and the training and recruitment of health care professionals.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26222)
Main issue 2: ESNEFT is undergoing a Sustainability Transformation Plan (STP) to determine how acute hospital healthcare provision will be provided.	East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26262)

Main Issue	Representations
<p>Significant investment in healthcare facilities and services is/ will be taking place, to meet requirements of existing and future catchment population by planned new housing growth. To deliver the STP a planning policy basis is needed.</p>	
<p>Main issue 3: Supportive of cross boundary working with local authorities across the ISPA to address highways issues.</p>	<p>Highways England (Rep ID: 26587)</p>
<p>Main issue 4: EastSuffolk is tasked with making modifications to their plan. SOCS very critical of the 'Statement of Common Ground' issued last year and submitted a response to the emerging Mid Suffolk Local Plan Consultation in addition to Suffolk Coastal District Council. SOCS attended and gave oral evidence to the EastSuffolk Plan Inquiry. Feel the Duty to Cooperate has not been effectively achieved within this Draft; nor has it by the partner local authorities.</p>	<p>Save Our Country Spaces (Rep ID: 26347)</p>
<p>Main issue 5: The Duty to Cooperate is hard for Ipswich to achieve when partner organisations are reluctant to take ownership/ responsibility for the adverse impacts they are imposing on the County Town. Ipswich has little power/ control for resolution.</p>	<p>Save Our Country Spaces (Rep ID: 26343)</p>
<p>Main issue 6: There is no cooperation between local authorities such as has happened around Cambridge or Norwich.</p>	<p>Ravenswood Environmental Group (Rep ID: 26637)</p>
<p>Main issue 7: Support that the Council has sought to co-operate with neighbouring authorities and statutory bodies on key strategy and cross-boundary issues. This is important given the tightly drawn boundary which constraints the ability to meet development needs.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26641)</p>
<p>Main issue 8: The Council has not co-operated effectively with neighbouring authorities to meet unmet Ipswich housing need.</p>	<p>Gladman Homes (Rep ID: 26361)</p>

Main Issue	Representations
<p>Main issue 9: Ipswich's administrative boundary justifies significant efforts to work with neighbouring authorities as a priority on cross boundary issues. Absence of detail weighs against how positively prepared the Final Draft of the Local has been and how effective its approach will be over the plan period. Persimmon also endorse the statements made by the HBF.</p>	<p>Persimmon Homes (Rep ID: 26381)</p>

Chapter 5 – Ipswich – The Place

Main Issue	Representations
<p>Main issue 1: Table 2 lists “cheap car parking” alongside sustainable transport modes which is not supported as this would encourage more driving and worsen air pollution.</p>	<p>Andrea McDonald (Rep ID: 26201)</p>
<p>Main issue 2: Health care providers in areas of deprivation are under more pressure than those in areas where deprivation is lower. Due to the extra strain put on health providers in areas of high deprivation, morale and recruitment is lower than areas where the level of deprivation is less. Tackling areas of the highest levels of deprivation must be seen as a priority going forward</p>	<p>Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26225)</p>
<p>Main issue 3: It is good to see that the benefits of health and wellbeing are being considered in initiatives not intrinsically linked to health. Creating a safe and sustainable link between new developments and areas of commerce and community is essential, be it via a well-lit walking path, cycle path or green corridors. The benefits to resident’s wellbeing should not be overlooked as linking people that would otherwise be isolated can have a major benefit to mental health.</p>	<p>Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26226)</p>
<p>Main issue 4: The physical building of a health and/or social facility or improving one is relatively acquirable in most circumstances but there is currently a national shortage of NHS staff in both primary care and secondary care</p>	<p>Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26227)</p>

Main Issue	Representations
causing capacity issues. LPAs can help aid recruitment by providing local communities that will attract NHS staff to them, by producing key worker housing in and around NHS campuses and facilities, encouraging commerce, designing and creating a vibrant and attractive community.	
Main issue 5: To take account of Environmental Bill, amend biodiversity section to "Prevent loss of biodiversity and implement measures for biodiversity net gain."	Suffolk Wildlife Trust (Rep ID: 26314)
Main issue 6: 5.25; Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge. Meeting the Climate Emergency needs to be added as a key challenge.	Save Our Country Spaces (Rep ID: 26382) Northern Fringe Protection Group (Rep ID: 26508)
Main issue 7: 5.26 (table 2); There are inconsistent references throughout the document (6.16, IBC FRA webpage, 8.45, 8.46, 8.225, DM4 PRFA). The situation regarding flood risk assessment within the CS is confusing and makes flood risk impossible to understand for the general public. Requires further clarification.	Save Our Country Spaces (Rep ID: 26382) Northern Fringe Protection Group (Rep ID: 26508)
Main issue 8: Allocating the land north of Burrell Road for residential development would address the issues identified in chapter 5.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26643)

3. Part B – The Strategy

Chapter 6 – Vision and Objectives

Main Issue	Representations
Main issue 1: No comments.	National Grid (Rep ID: 26200)
Main Issue 2: Object as some existing health infrastructure will require further investment/ improvement to meet the needs of growth in this LP. Provision needed to address development impact on health infrastructure and ensure timely cost-effective delivery of necessary infrastructure improvements.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26205)

Main Issue	Representations
<p>Main issue 3: Objective 10 - The CCG is undergoing a data gathering exercise for all primary care facilities in Suffolk with the aim of providing a 6-facet survey. The outcome of this project will be reliable data showing the CCG the general physical condition of all primary care facilities. Once this information is known the CCG will be in a better position to know which facilities require improvement and which facilities are in good condition.</p>	<p>Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26228)</p>
<p>Main issue 4: Natural England is satisfied that their recommendations have been taken into account. Natural England considers the approach taken with regards to the natural environment to be sound.</p>	<p>Natural England (Francesca Shapland) (Rep ID: 26289)</p>
<p>Main issue 5: Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document. See comments on DM4 regarding unsoundness.</p>	<p>Environment Agency (Rep ID: 26274)</p>
<p>Main issue 6: Whilst support allocation at Humber Doucy Lane, seeking minor amendments to detailed wording. Plan should not make generic references to "future" development or refer to requirement for phasing without appropriate evidence/details. Wording of paragraph 6.17 should be amended to reflect this.</p>	<p>Kesgrave Covenant (Rep ID: 26438)</p>
<p>Main issue 7: In general agreement with the Vision and Objectives, however, consider that there should be explicit recognition that, unless development is viable (or is subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved (and is unsound). The word 'viable' needs to be added to Objective 4.</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26552)</p>
<p>Main issue 8: General support for the spatial strategy, as set out at paragraphs 6.10 to 6.22.</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26553)</p>

Main Issue	Representations
Main issue 9: Reference should be made to Government's net zero 2050 policy together with reference to IBC's Climate Emergency Declaration in order for the plan to be sound. Failure to do so could make the CS unlawful.	Councillor Oliver Holmes (Rep ID: 26611)
Main issue 10: Objectives should be re-written to state that permitted development will not add to carbon emissions. Reference should be made to air quality/need for development not to increase poor air quality in existing and potentially new AQMAs for the plan to be sound. Continued reference to modal shift could be seen as disingenuous without evidence to show shift is occurring. Need to provide initiatives for developers to make it happen.	Councillor Oliver Holmes (Rep ID: 26613)
Main issue 11: Reference to development at Humber Doucy Lane being "appropriately phased" with IGS is too open-ended. To be sound, no development should take place until a trigger point of 3,200 homes completed.	Councillor Oliver Holmes (Rep ID: 26617)
Main issue 12: Consider addition of reference to ecological networks and connectivity to reflect NPPF paragraphs 173(d) and 174(b).	Suffolk Wildlife Trust (Rep ID: 26316)
Main issue 13: The Climate Change agenda and climate emergency declaration is insufficiently addressed throughout the document.	Save Our Country Spaces (Rep ID: 26340)
Main issue 14: NPPF Paragraph 11 not considered. Growth inadequately assessed against serious adverse effects/ impacts of SA.	Save Our Country Spaces (Rep ID: 26340 & 26342)
Main issue 15: Housing/ Jobs growth, including IGS, undermined by lack of assessment of requirement for wastewater infrastructure.	Save Our Country Spaces (Rep ID: 26340) Northern Fringe Protection Group (Rep ID: 26534)
Main issue 16: Concerns throughout document regarding traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality; climate emergency and climate change precipitated flood risk, loss of grade 2 farm land, loss of vital green rim and	Save Our Country Spaces (Rep ID: 26348)

Main Issue	Representations
urban/rural separation with its attendant adverse impacts on the network of wildlife links with green corridors,	
Main issue 17: Objective 1 is inadequately demonstrated	Save Our Country Spaces (Rep ID: 26359)
Main issue 18: The 4% and % affordable housing negotiated does not meet the 31% quoted in objective 2. Evidence of recent job losses in town undermines credibility of job target.	Save Our Country Spaces (Rep ID: 26359)
Main issue 19: Lack of justification for Humber Doucy Lane (ISPA4.1) allocation in objective 3.	Save Our Country Spaces (Rep ID: 26359)
Main issue 20: Objective 5: Concerns about railway noise/ vibration from intensification of line and traffic from humpback bridge. Current rail noise causes residents complaints and audible for a distance of about 1/4-1/2 a mile at night causing significant sleep-disturbance especially in summer. 5 point rail plan agreed 2018 and no assessment of diesel pollution. The original indicator of “air quality exceedances” and objective to improve air quality should be reinstated.	Save Our Country Spaces (Rep ID: 26359)
Main issue 21: Objective 5 (continued): 1. Inconsistent with national policy, fails to comply with legal limits. Must be requirement. 2. Strengthen commitment to Improve Air Quality, no real improvement over past decade. 3. No funding in IBC’s financial plan for improving air quality. 4.No AQA. Must be completed urgently. Include assessments for early years of developments, construction-related traffic and rail/sea traffic and impacts of different levels of modal shift rather than unsubstantiated levels assumed. 5. Little point undertaking an AQA in 2036 as ban on non-electric vehicles. Early years likely to be worst. Suggest earlier assessment. 6. Ambiguity over 2004 emission levels cited	Save Our Country Spaces (Rep ID: 26367) Northern Fringe Protection Group (Rep ID: 26497)
Main issue 22: Objective 6: why 15% modal shift by 2031 target removed	Save Our Country Spaces (Rep ID: 26383)

Main Issue	Representations
<p>given still required for soundness. Imperative that modal shift target for 2026 included. Must report the modal shift levels achieved through Travel Ipswich in AMR (appendix 5 quoted). Evidence needed showing that modal shift can be delivered. Need to illustrate what "additional east-west highway capacity" is. Considerable investment in public transport required. Insufficient firm proposals or funding to deliver the required modal shift levels throughout the CS period. CS is unsound as it lacks a transport solution that supports proposed growth. Switch to electric cars will not solve health impacts.</p>	<p>Northern Fringe Protection Group (Rep ID: 26509)</p>
<p>Main issue 23: Objective 6: 1. Junctions/ link roads at/near capacity, not addressed. No evidence growth is sound. 2. Severe capacity issues in 2026 but no infrastructure projects in Infrastructure Tables. Especially town centre, Ipswich Garden Suburb and A1214. 3. Modelling fails to identify when junctions will reach capacity. 4. Failing to Improve Access in breach of CS5. Modal Shift assumptions too high, uncompliant with CS20. 5. CCC assumes 10% modal shift by 2050. No evidence 15% modal shift deliverable by 2026? CCC assumption should be used. 6. Existing walking/ cycling infrastructure substandard, won't enable delivery of modal shift. Need new cycling indicator.</p>	<p>Save Our Country Spaces (Rep ID:26362) Northern Fringe Protection Group (Rep ID: 26493)</p>
<p>Main issue 24: Objective 6 (continued): 7. No funding allocated in IBC's financial plan to encourage modal shift. 8. Doesn't include proportionate evidence. New Evidence database incomplete as excludes Transport documents, especially modal shift related and S106 schedules for approved IGS developments which haven't been made publicly available.</p>	<p>Save Our Country Spaces (Rep ID: 26363) Northern Fringe Protection Group (Rep ID: 26496)</p>

Main Issue	Representations
<p>9. Concerned that road bridges (and country park) may not be delivered in time (February 2022) to receive £9.8m HIF. If so, then CS is unsound unless alternative funding available.</p> <p>10. Not positively prepared as fails to fully assess transport infrastructure requirements, especially in relation to timing of delivery (including sewage).</p>	
<p>Main issue 25: Objectives 4 and 9: Need to reference Climate Emergency Declaration.</p>	<p>Save Our Country Spaces (Rep ID: 26370) Northern Fringe Protection Group (Rep ID: 26498)</p>
<p>Main issue 26: Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective.</p>	<p>Save Our Country Spaces (Rep ID: 26380) Northern Fringe Protection Group (Rep ID: 26507)</p>
<p>Main issue 27: The Vision needs to include an improvement in air quality levels and compliance with legally binding targets. Climate emergency also needs to be included.</p>	<p>Save Our Country Spaces (Rep ID: 26380) Northern Fringe Protection Group (Rep ID: 26507)</p>
<p>Main issue 28: Support objectives 2 and 4. Recognise no realistic alternative to locating some development in flood zone 3. Allocating the land north of Burrell Road for residential development would help meet the objectives of the Local Plan.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26644)</p>
<p>Main issue 29: Under paragraph 35 of the National Planning Policy Framework ('The Framework') we consider that this Plan is unsound as some aspects are not effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. In particular we have recommended the inclusion of specific policy references for heritage assets and identified mitigation within Policies SP2 (Land Allocated for Housing), SP4 (Opportunity Sites), SP5</p>	<p>Historic England (Rep ID: 26654)</p>

Main Issue	Representations
(Land Allocated for Employment Use), SP11 (The Waterfront), SP12 (Education Quarter), and SP13 (Portman Quarter).	
Main issue 30: Acknowledges the positive enhancements to the local plan in terms of the adherence with security measures.	Suffolk Constabulary (Rep ID: 26177)

Chapter 7 – Key Diagram

Main Issue	Representations
Main issue 1: The amendment to include the small area of the AONB, as requested at Preferred Options, is supported.	AONB Unit (Rep ID: 26248)
Main issue 2: Whilst support allocation at Humber Doucy Lane, seeking minor amendments to detailed wording. Plan should not make generic references to "future" development or refer to requirement for phasing without appropriate evidence/details. Wording of paragraph 7.2 should be amended to reflect this.	Kesgrave Covenant (Rep ID: 26439)
Main issue 3: Strongly disagree with the proposed change to replace "green rim" with "green trail". Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it. Change in name is misleading and is actually to bring forward land at Humber Doucy Lane for development.	Save Our Country Spaces (Rep ID: 26398) Northern Fringe Protection Group (Rep ID: 26517)
Main issue 4: Support IP-One Area boundary.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26645)
Main issue 5: Object to Waterfront boundary which should be extended westwards to cover land to the North of Burrell Road. This Site is suitable for residential development.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26645)
Main issue 6: Regarding the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map, IP-One Area inset map and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas. However, these areas do not match up with illustrative boundaries in The Ipswich Key Diagram. The opportunity areas need to be clearly defined and labelled on the policies map, so that it is	Historic England (Rep ID: 26661)

Main Issue	Representations
clear which policy and supporting text relates to which area, and the extent of the land in question.	
Main issue 7: Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as “Land Allocated for Sport Use” on the basis that it is not required for this purpose. It is proposed that the site is allocated for residential development.	Ipswich School (Rep ID: 26588)

Chapter 8 – The Spatial Strategy

Main Issue	Representations
Main issue 1: Generally supportive of spatial strategy.	Highways England (Rep ID: 26583)
Main issue 2: Re-phrase paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan.	Babergh and Mid Suffolk (Rep ID: 26467)

Policy ISPA1 – Growth in the Ipswich Strategy Planning Area

Main Issue	Representations
Main issue 1: No viable transport solutions offered to provide the improved infrastructure for sustainable growth. Schemes unlikely to be achievable as planning gain through development. Need to re-write Plan to include sustainable options.	Councillor Oliver Holmes (Rep ID: 26619)
Main issue 1: Argued for years that previous homes and employment targets set by IBC were too high, unrealistic and based upon flawed evidence. Now clear that previous Plans were unsound and were therefore sub-optimal for Ipswich as we argued strongly at the time. Disappointing that IBC has taken so long to accept this.	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)
Main issue 2: The proposed lower targets are more realistic.	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)
Main issue 3: Agree with IBC that it has established a 5- year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply.	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)
Main issue 4: Potential impact of Sizewell C on IGS and CS has not been assessed (rail freight Ipswich-Westerfield).	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)

Main Issue	Representations
<p>Main issue 5: Support the recognition within the Plan that the Council will need to work closely with neighbouring authorities regarding future development and infrastructure, as set out in the first strategic objective. However, as expanded upon below we do not consider that the Council have fully explored all opportunities to work with neighbouring authorities to meet full identified housing needs throughout the Plan period as a whole, as also set out in response to the Suffolk Coastal emerging Local Plan (refer to Appendix C)</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26581)</p>
<p>Main issue 6: Discrepancy in the housing need figure across the ISPA (see table 1). This requires clarification. East Suffolk relies on the 2016 household projections whereas IBC uses the 2014 household projections, thus reducing the IBC housing need figure.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26646)</p>

Policy ISPA2 – Strategic Infrastructure Priorities

Main Issue	Representations
<p>Main issue 1: The CCG is very happy to see that health provision is identified as key infrastructure and will work with the council and alliance partners in providing holistic healthcare for the residents of Ipswich.</p>	<p>Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26206)</p>
<p>Main issue 2: Suggest that policy includes reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural green space in order to align with the Statement of Common Ground between ISPA authorities which specifically references these points.</p>	<p>East Suffolk Council (Rep ID: 26390)</p>
<p>Main issue 3: Encouraging to see that Network Rail is mentioned in Policy ISPA2 Strategic Infrastructure Priorities as a working partner of Ipswich Borough Council to enable the delivery of key infrastructure projects.</p>	<p>Network Rail (Rep ID: 26544)</p>
<p>Main issue 4: Encourage early engagement on strategic development sites to ensure all impacts are identified and taken into consideration at the masterplan stage.</p>	<p>Network Rail (Rep ID: 26546)</p>
<p>Main issue 5: Funding for A14 not certain. Without robust measures identified by Suffolk County Council, it isn't certain that delivery of the latter stages of the plan can be achieved - vital that a robust manage and monitor approach is maintained throughout the plan period.</p>	<p>Highways England (Rep ID: 26592)</p>

Main Issue	Representations
Main issue 6: On 25/02/2020, Suffolk County Council resolved not to take Northern Bypass scheme forward.	Highways England (Rep ID: 26594)
Main issue 7: Not in favour of proposal for an east bank link road and a new A14(T) junction as there is concern with resultant local 'junction hopping' along the A14 which would reduce highway capacity, and more significantly it is considered that there is insufficient geometric capacity to accommodate an additional junction on this section of the A14.	Highways England (Rep ID: 26596)
Main issue 8: We consider that policy ISPA2 should also include delivery of strategic green infrastructure alongside the other types of infrastructure listed.	Suffolk Wildlife Trust (Rep ID: 26321)
Main issue 9: Needs to include the highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound. See 12 highways schemes listed in attached letter.	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26510)
Main issue 10: The list of highway schemes excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson. Needs to be confirmed whether this infrastructure project has been included and modelled accordingly.	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26510)
Main issue 11: Support the inclusion of sewage infrastructure in ISPA2.	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26510)

Policy ISPA3 – Cross-boundary Mitigation of Effects on Protected Habitats and Species

Main Issue	Representations
Main issue 1: Support commitment to address the issue of recreational impact avoidance and mitigation through continued joint working.	East Suffolk Council (Rep ID: 26391)

Policy ISPA4 – Cross Boundary Working to Deliver Sites

Main Issue	Representations
Main issue 1: Site should remain as farmland to provide the green trail (as per Policy DM10).	Derk Noske (Rep ID: 26194) Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)

Main Issue	Representations
Main issue 2: Additional housing would encroach on this pristine countryside that provides easy access to green spaces.	Derk Noske (Rep ID: 26194)
Main issue 3: Allocation will significantly increase traffic and development should not take place until significant improvements to roads/ travel have been made.	Rushmere St Andrew Parish Council (Rep ID: 26233) Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)
Main issue 4: The agreement to work with ESC supported. Development near Humber Doucy Lane is within the catchment of Two Rivers Medical Centre and primary care provision would likely be prescribed here	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26207)
Main issue 5: The possibility of issues arising from developments near to local authority boundaries regarding healthcare provision is prevalent. The developments of IGS, continued development of Ravenswood and Whitton are examples of possible cross-boundary developments. Communication/ cooperation will be vital in making sure that appropriate stakeholders are aware and mitigation is sought in a timely manner. Make sure that the land North of Ipswich is accounted for in mitigating health.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26207)
Main issue 6: The Rugby Football Club has a need to expand its facilities/ pitches to meet local demand. The potential sale of the existing land could realise the funding to assist the club to meet these demands either through an expansion adjacent to the existing site or a alternative new site. Site IP184b should be included within the ISPA4.1 allocation.	Ipswich Rugby Football Club (Rep ID: 26246)
Main issue 7: It will be important that the Council can show that the cross-boundary issues concerning the deliverability of those sites in ISPA4 which will meet a considerable portion of the ISPA's housing needs will be addressed by the Council and the relevant agencies.	Home Builder Federation (Rep ID: 26329)
Main issue 8: Support principles regarding development of land at Humber Doucy Lane. Approach is complementary of the Suffolk Coastal Final Draft Local Plan and contributes towards the outcome outlined in the Statement of Common Ground of each local planning authority meeting housing need within their own area. Support 30% affordable housing requirement which complements the affordable housing policy in the Suffolk Coastal Final Draft Plan.	East Suffolk Council (Rep ID: 26392)

Main Issue	Representations
<p>Main issue 9: Suggest policy for development at northern end of Humber Doucy Lane references maintenance of separation between Ipswich and surrounding settlements, for consistency with DM11. Could provide appropriate level of flexibility by not specifying that SANGs be located on both sides of boundary. Suitable Accessible Natural Greenspaces should be changed to Suitable Alternative Natural Greenspaces.</p>	<p>East Suffolk Council (Rep ID: 26393)</p>
<p>Main issue 10: KCL has additional land in vicinity so may be possible to locate outside of allocated site. Limiting green infrastructure to within allocation overly restrictive, therefore not effective or sound. Policy outlines affordable housing requirements as much higher than 15% plan requirement. Whilst provision supported in principle, Council must ensure viability. Recommend changes to policy wording to reflect these points.</p>	<p>Kesgrave Covenant (Rep ID: 26440)</p>
<p>Main issue 11: Paragraph 8.28 refers to transport mitigation measures required for the development of the site at Humber Doucy Lane being "challenging". This is not considered to be the case and current reference to "challenging" transport mitigation measures not justified. Recommend amendment to paragraph 8.28.</p>	<p>Kesgrave Covenant (Rep ID: 26441)</p>
<p>Main issue 12: The plan identifies requirement for sites to provide 15% affordable housing, with the exception of Humber Doucy Lane and IGS where 30/31% required respectively. Whilst support the provision of affordable housing, more detailed viability testing may be required to ensure site is viable with regard to all infrastructure costs. Recommend amendment to paragraph 8.29 to reflect this.</p>	<p>Kesgrave Covenant (Rep ID: 26442)</p>
<p>Main issue 13: Breach of policies DM8, DM10 and DM11 as no net biodiversity gains or green infrastructure through development.</p>	<p>Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)</p>
<p>Main issue 14: No development of this land until completion of IGS. Needs to be clarified in the CS.</p>	<p>Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)</p>
<p>Main issue 15: Sustainability Appraisal needs to fully assess implications on building on site and whether delivering</p>	<p>Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)</p>

Main Issue	Representations
more homes in town centre instead of retail is more sustainable option.	
Main issue 16: Adverse impacts and significant disruption will undoubtedly occur in both the short and long term on existing residents	Save Our Country Spaces (Rep ID: 26396)
Main issue 17: Portfolio holder (paper E/13/601); “ 2.2 The development of the Northern Fringe involves major challenges due to its largescale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities.”	Save Our Country Spaces (Rep ID: 26396)
Main issue 18: ISPA4 is unjustified/ unsound. Concerns regarding air quality, flood risk vulnerability and biodiversity/ habitat loss.	Save Our Country Spaces (Rep ID: 26396)
Main issue 19: Future households will have to bear costs of management/ maintenance of drainage. Should be levied to new houses.	Save Our Country Spaces (Rep ID: 26396)
Main issue 20: Site no longer needed by Suffolk Coastal Local Plan due to Inspector recommending lower housing target.	Save Our Country Spaces (Rep ID: 26387) Northern Fringe Protection Group (Rep ID: 26512)
Main issue 21: Settlement Sensitivity Assessment recognises the sensitivity of the open land between the edge of suburban Ipswich and villages of Westerfield and Rushmere. Concludes that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. Site too important/ sensitive to be built on.	Save Our Country Spaces (Rep ID: 26387) Northern Fringe Protection Group (Rep ID: 26512)
Main issue 22: Will need additional primary school, which has traffic implications.	Save Our Country Spaces (Rep ID: 26387) Northern Fringe Protection Group (Rep ID: 26512)
Main issue 23: There is a lack of a coordinated approach, with allocations proposed within Ipswich. Concerned that spatial strategy has been unduly influenced by the administrative boundary, e.g. SHELAA only looking at sites within IBC.	Bloor Homes (Strutt and Parker) (Rep ID: 26590)
Main issue 24: The Site has the potential to help meet housing needs within a location (East of Ipswich) which has already been tested through the Suffolk Coastal Local Plan plan-making process and found to be a sustainable location for growth. Do not consider the Site has been robustly assessed, subsequently a sustainable option for growth being rejected without	Bloor Homes (Strutt and Parker) (Rep ID: 26590)

Main Issue	Representations
justification. 200 homes (shorter term) and 1,200 homes (medium term)	
Main issue 25: Development must preserve and where possible enhance identified heritage assets and their settings where this setting contributes to significance. Heritage Impact Assessment required. Any specific measures required to remove/mitigate any harm should be included in a site specific policy for ISPA4.1.	Historic England (Rep ID: 26658)
Main issue 26: Consider including a local centre at the site.	Suffolk County Council (Rep ID 26579)
Main issue 27: The Council and the relevant agencies need to show that cross-boundary issues concerning the deliverability of those sites in ISPA4 will be addressed.	Home Builder Federation (Rep ID: 26329)
Main issue 28: Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative reference to allocation of land west of Tuddenham Road, north of Millenium Cemetery (500 dwellings).	Ipswich School (Rep ID: 26629)

Policy CS1 – Sustainable Development

Main Issue	Representations
Main issue 1: Support paragraph 8.41. 8.44 should reference fluvial flood risk. The SFRA should be updated when new modelling becomes available.	Environment Agency (Rep ID: 26275)
Main issue 2: Policy not required. Duplicates national policy.	Home Builders Federation (Rep ID: 26304)
Main issue 3: Need to re-write Policy to be compliant with UK Government policy on climate change. Net zero by 2050 is an objective above the NPPF. All development in Ipswich must be at or close to net zero by 2036 otherwise the 2050 target cannot be achieved.	Councillor Oliver Holmes (Rep ID: 26620)
Main issue 4: Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.	Northern Fringe Protection Group (Rep ID: 26525) Save Our Country Spaces (Rep ID: 26356)
Main issue 5: Needs to reference/ consider Climate Emergency Declaration and Heathrow Judgement.	Northern Fringe Protection Group (Rep ID: 26525) Save Our Country Spaces (Rep ID: 26356)
Main issue 6: Need local approach to how development proposals will be considered against the presumption in favour.	Gladman Homes (Rep ID: 26366)

Main Issue	Representations
Main issue 7: CS1 is not consistent with the National Policy and should be removed. Persimmon Homes also endorse representation submitted by HBF.	Persimmon Homes (Rep ID: 26369)

Policy CS2 – The Location and Nature of Development

Main Issue	Representations
Main issue 1: Designing developments in such a way that encourages the use of more sustainable modes of transport to get to community infrastructure is welcome and will help in the NHS preventative aspirations being obtained.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26208)
Main issue 2: Limiting green infrastructure to the application site is overly restrictive. KCL has additional land in the vicinity of the Humber Doucy Lane site allocation so it may be possible to locate green infrastructure uses outside the site. Therefore, seek flexibility to policy wording to ensure the most appropriate option can be pursued.	Kesgrave Covenant (Rep ID: 26448)
Main issue 3: Plan should be specific about any infrastructure requirements that will influence timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details. Recommend amendment to paragraph 8.55 wording to reflect this.	Kesgrave Covenant (Rep ID: 26451)
Main issue 4: ABP’s vision for the site does not envisage ‘high density’ development as currently defined in Policy DM23. Request additional wording in the final paragraph of Policy CS2: “...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets...”or wording of similar effect.	Associated British Ports (Rep ID: 26468)
Main issue 5: General support for Policy CS2. Welcome changes to criterion h, which is now consistent with the guidance set out in the NPPF.	Cardinal Lofts (Mill) Ltd) (Rep ID: 26554)
Main issue 6: Level of town centre retail development isn't required, land better used for new homes.	Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)
Main issue 7: Town centre housing has lower impact on traffic congestion and air quality than outskirts development. Opportunities to convert existing excess town centre retail into housing. This	Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)

Main Issue	Representations
<p>approach should be used instead of Humber Doucy Lane, which will exacerbate traffic congestion into town centre and along Valley/Rd/Colchester Rd.</p>	
<p>Main issue 8: Ipswich Central supports increase in town centre homes. Will improve town centre and night-time economy, reduce traffic into the centre, facilitate modal shift and improve air quality.</p>	<p>Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)</p>
<p>Main issue 9: Parking Strategy over-estimates parking demand, brownfield parking land better for housing.</p>	<p>Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)</p>
<p>Main issue 10: Support the content of the policy itself but land North of Burrell Road should be allocated for residential development to help achieve the aims of this policy.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26647)</p>
<p>Main issue 11: Concerned that 'higher density homes' is a synonym for tall buildings/ flats. Appears to be confirmed in final paragraph of Policy. Inference that 'high density' could 'compromise' the historic character of Ipswich, by way of tall buildings affecting the setting of these assets, impacting on their significance. Consider this section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. Should also make clear that good design should not only respect the historic character of an area, but respond to it. High density does not need to take the form of flats, see 'Increasing Residential Density publication (2018).</p>	<p>Historic England (Rep ID: 26655)</p>
<p>Main issue 12: The Council's housing sites are undeliverable or in the flood zone. Therefore, sites outside the boundary need to be identified. Gladman proposes two sites in East Suffolk and Babergh.</p>	<p>Gladman Homes (Rep ID: 26375)</p>
<p>Main issue 13: A prescriptive approach in the interpretation of the policy would limit opportunities to respond to market forces. Persimmon also endorse the statement made by the HBF.</p>	<p>Persimmon Homes (Rep ID: 26425)</p>
<p>Main issue 14: Object to soundness. BMS consider statements made in the plan to the effect that later in the plan period housing supply opportunities in Ipswich will be limited, are premature and shouldn't be made until a comprehensive regeneration and assets strategy has been undertaken. Ipswich should look at its car parks and should have developed its car parking</p>	<p>Babergh and Mid Suffolk (Rep ID: 26450)</p>

Main Issue	Representations
strategy before asserting that housing land supply opportunities are likely to be limited.	
Main issue 15: Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2(b), suggest alternative reference to allocation of land off Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings).	Ipswich School (Rep ID: 26623)

Policy CS3 – IP-One Area Action Plan

Main Issue	Representations
Main issue 1: Support regeneration objectives for IP-One area in general. However, request addition of a new criterion into any new policy based on Policy CS3: “New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.” Support the inclusion of similar wording to this effect in Policy CS13.	Associated British Ports (Rep ID: 26469)
Main issue 2: General support for Policy. Welcome change made to criterion c and the explicit recognition that guidance set out in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft may not always be the optimum way to develop a site.	Cardinal Lofts (Mill) Ltd (Rep ID: 26555)
Main issue 3: Action plan fails to make the most of allocating previously developed land. A greater number of small to medium scales deliverable sites are required to make the plan sound. Land North of Burrell Road is suitable for a residential allocation.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26648)
Main issue 4: Extremely concerned about the following key aspects: <ol style="list-style-type: none"> 1. The lack of clarity regarding the status of the IP-One Area Action Plan; 2. The lack of clear delineation of the opportunity areas; and 3. The absence of robust policies for these which in our view renders this aspect of the Plan not effective, and therefore unsound. See detailed commentary for further explanation of these concerns. Ipswich has a high number of historic assets in the IP-One area and appropriate management of the historic environment will therefore be a	Historic England (Rep ID: 26657)

Main Issue	Representations
significant consideration in the design and deliverability of new development.	
Main issue 5: The way the IP-one area action plan is referred to suggests that this work has yet to be completed, and that in due course a new Area Action Plan will be prepared, clarifying the opportunity area boundaries, and setting out detailed policy criteria. However, this is not clear and is confusing and misleading. Concern is that the Plan should be readable and useable for everyone. If the IP-One Area Action Plan has been completed and is incorporated, then Policy and supporting text need to clearly state this. Notwithstanding this, it is our contention that the Council has not followed CS3.	Historic England (Rep ID: 26660)

Policy CS4 – Protecting our Assets

Main Issue	Representations
Main issue 1: The amendment to bullet point H of the policy is supported.	AONB Unit (Rep ID: 26252)
Main issue 2: Ensure correct terminology with reference to the draft South East Marine Plan and The East Inshore and East Offshore Marine Plans.	Marine Management Organisation (Rep ID: 26548)
Main issue 3: Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it.	Save Our Country Spaces (Rep ID: 26399) Northern Fringe Protection Group (Rep ID: 26518)
Main issue 4: Welcome the changes to criterion 3 regarding the Council's commitment to a local list in policy.	Historic England (Rep ID: 26666)

Policy CS5 – Improving Accessibility

Main Issue	Representations
Main issue 1: The accessibility of infrastructure is a key factor in designing a development that is aimed at meeting environmental and health objectives. Despite the desire to have all community infrastructure within easily accessible locations, it might not always be possible for health but this does not mean that community space could not be accessible to provide community healthcare services on an ad hoc basis.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26209)

Main Issue	Representations
Main issue 2: Support Policy and agree that inclusive transport infrastructure should be a priority.	Network Rail (Rep ID: 26545)
Main issue 3: Disappointed that only the Town Centre is specifically mentioned as being a location dependent upon access by a variety of transport modes. This 'recognition' should be expanded to include the whole of the IP-One Area.	Cardinal Lofts (Mill) Ltd) (Rep ID: 26556)
Main issue 4: Must bear in mind that the vast majority of journeys into and through Ipswich are by car and there is no objective for limiting or reducing car transport. It is entirely likely that accessibility will decrease over the plan period.	Councillor Oliver Holmes (Rep ID: 26621)
Main issue 5: IBC is failing to Improve Access in breach of CS5. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)
Main issue 6: Concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)
Main issue 7: Disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)
Main issue 8: New infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)
Main issue 9: Bus routes just go into town rather than radial. Investment in bus network required.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)
Main issue 10: No money allocated over four-year period to improving air quality, delivering modal shift or improving cycle/ pedestrian infrastructure.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)

Policy CS7 – The Amount of Housing Required

Main Issue	Representations
Main issue 1: Shortfall of 796 units requires clarification. Presumably as a result of housing supply period being reduce from 2018 to 2019-2036?	Constable Homes (Tom Cole) (Rep ID: 26298)
Main issue 2: Ipswich has poor housing delivery (see housing delivery test results)	Constable Homes (Tom Cole) (Rep ID: 26298)

Main Issue	Representations
and will need to accelerate delivery to overcome significant shortfall.	
Main issue 3: 20% buffer to five year housing supply should be applied as no buffer applied to CS7.	Constable Homes (Tom Cole) (Rep ID: 26300)
Main issue 4: To be effective, a buffer equivalent to one year's supply (445 dwellings) should be added to five year housing land supply as the Housing Delivery Test requirement will increase to 75% as of February 2021.	Constable Homes (Tom Cole) (Rep ID: 26300)
Main issue 5: Critical position of acute undersupply of housing. Current approach will mean an immediate review of Plan necessary.	Constable Homes (Tom Cole) (Rep ID: 26300)
Main issue 6: The Council's desire for jobs and economic growth is not matched by the Council's decision to adopt a lower housing requirement.	Home Builders Federation (Rep ID: 26323) Gladman Homes (Rep ID: 26406)
Main issue 7: The Council will not meet its need for affordable housing.	Home Builders Federation (Rep ID: 26315) Gladman Homes (Rep ID: 26406)
Main issue 8: Do not agree with the steps proposed. The approach is not sufficiently challenging and is likely to lead to the whole plan underdelivering.	Home Builders Federation (Rep ID: 26313) Gladman Homes (Rep ID: 26406)
Main issue 9: It is not evident which sites form the basis of supply within the first five years of the plan. It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period.	Home Builders Federation (Rep ID: 26311) Gladman Homes (Rep ID: 26406)
Main issue 10: Plan should be specific about any infrastructure requirements that will influence timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details. Recommend amendment to policy wording to reflect this.	Kesgrave Covenant (Rep ID: 26452)
Main issue 11: No housing trajectory and the rate of delivery unknown. This is a significant failure.	Bloor Homes (Strutt and Parker) (Rep ID: 26582)
Main issue 12: The Site can deliver a smaller scale housing development of around 200 homes within the early Plan period.	Bloor Homes (Strutt and Parker) (Rep ID: 26582)
Main issue 13: Without full consideration of this and joint working to increase delivery, the stepped trajectory has not been justified and is unsound. Plan is also overly reliant on delivery of IGS for stepped delivery.	Bloor Homes (Strutt and Parker) (Rep ID: 26582)

Main Issue	Representations
Main issue 14: Question the overall housing requirement and whether the Council have adequately considered uplifting to support economic growth as this contradicts paragraph 8.168. Contrary to NPPF 35 and not positively prepared or effective.	Bloor Homes (Strutt and Parker) (Rep ID: 26582)
Main issue 15: Plan fails to acknowledge or address the 20% buffer required by the housing delivery test. More short/ medium term sites needed to ensure consistent delivery. Land north of Burrell Road would aid delivery of windfall development.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)
Main issue 16: Support aims of Housing Delivery Action Plan.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)
Main issue 17: Concerning that only 47 windfall dwellings delivered 2017-18 but plan relies on 50 per annum.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)
Main issue 18: Support 100% previously developed land aim in IP-One.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)
Main issue 19 (see also 6-9): The housing requirement is too low; it should not be stepped; historic delivery shows need will not be met; IP-One sites are unrealistic; economic and affordable housing needs will not be met; delivery rate at IGS is overestimated; further distribution across the HMA is required.	Gladman Homes (Rep ID: 26406)
Main issue 20: Housing requirement – The policy is not sound, the housing requirement has not been justified. The Council’s desire for jobs and economic growth is not matched by the Council’s decision to adopt a lower housing requirement.	Home Builders Federation (Rep ID: 26323)
Main issue 21: Housing requirement - The policy is not sound, the housing requirement has not been justified. The Council will not meet its need for affordable housing.	Home Builders Federation (Rep ID: 26315)
Main issue 22: Stepped approach – The policy is not sound, the stepped trajectory has not been justified. Do not agree with the steps proposed. The approach is not sufficiently challenging and is likely to lead to the whole plan underdelivering.	Home Builders Federation (Rep ID: 26313)
Main issue 23: Housing supply - It is not evident which sites form the basis of supply within the first five years of the plan. It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period.	Home Builders Federation (Rep ID: 26311)
Main issue 24: A prescriptive approach in the interpretation of the policy would limit	Persimmon Homes (Rep ID: 26426)

Main Issue	Representations
opportunities to respond to market forces. Persimmon also endorse the statement made by the HBF.	
Main issue 25: Object to soundness. Policy CS7 contradicts the text in paragraph 8.58. It is unclear whether Ipswich can meet its housing need beyond 2031. Ipswich have not adhered to the correct and proper process as set out in the ISPA Statement of Common Ground where housing need cannot be met.	Babergh and Mid Suffolk (Rep ID: 26464)
Main issue 26: Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2(b), suggest alternative reference to allocation of land off Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings).	Ipswich School (Rep ID: 26626)

Policy CS8 – Housing Type and Tenure

Main Issue	Representations
Main issue 1: The CCG and Alliance partners are willing to be involved in any discussions involving assisted living and residential care homes. This area of development puts strain on all healthcare providers and being involved in discussions from the earliest stage possible will help primary, secondary, community and mental health care mitigate the impact.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26210)
Main issue 2: There is a need for elderly accommodation and policy needs to be expanded to acknowledge that retirement living supported.	Constable Homes (Tom Cole) (Rep ID: 26301)
Main issue 3: The surplus of accommodation referred to in the policy relates to sheltered accommodation. This does not include elderly accommodation and as such the policy needs to set out the need for elderly accommodation specifically.	Constable Homes (Tom Cole) (Rep ID: 26301)
Main issue 4: The delivery of elderly accommodation at Red House Farm would have a trickle-down benefit of freeing up other housing from people down-sizing.	Constable Homes (Tom Cole) (Rep ID: 26301)
Main issue 5: The draft plan does not acknowledge the need for specialised housing for more able older people who wish to retain a level of independence and does not address the projected increase in over 65s with appropriate housing provision.	Councillor Timothy Lockington (Rep ID: 26310)

Main Issue	Representations
Main issue 6: Support inclusion of up to date definitions of affordable housing in CS8 and CS12, as set out in Annex 2 of the framework.	Rentplus UK (Rep ID: 26357)
Main issue 7: Welcome amendments to CS8 promoting a more flexible approach to mix where evidenced by the SHMA. However, for clarity and consistency, policy should be reworded to include reference to tenure as well as size and type when referring to appropriate mix of homes.	Rentplus UK (Rep ID: 26360)
Main issue 8: Welcome policy on housing type and tenure mix and the recognition of potential exceptions to these requirements. Note desire to secure high density development on central sites (para 8.121), however, high density may not be appropriate in all instances.	Associated British Ports (Rep ID: 26470)
Main issue 9: Generally supportive of CS8. Welcome acknowledgement that it may not always be viable to provide a full mix of dwelling types and sizes.	Cardinal Lofts (Mill) Ltd (Rep ID: 26557)
Main issue 10: There is a disconnect between Policy CS8 seeking a mix of housing to meet the identified needs and site allocations, contrary to national policy. 61% of dwellings proposed are at a high density. These are likely to be small flats and over saturate this market. 13% of dwellings will be low density and predominantly houses, we question if this will meet the actual housing mix identified in qualitative terms or the overall need figure.	Bloor Homes (Strutt and Parker) (Rep ID: 26586)
Main issue 11: IGS only likely to deliver post 2024 so there is a need for 3-bedroom and larger homes in early plan period. The Site can deliver this.	Bloor Homes (Strutt and Parker) (Rep ID: 26586)
Main issue 12: It is recommended that the Self and Custom Build element of the policy is modified so it as the discretion of the developer to provide self-build homes on site.	Gladman Homes (Rep ID: 26411)
Main issue 13: There is a weak market for high density flatted development in Ipswich. It is recommended that allocations for schemes are revisited with a view to allow for lower density development. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26386)
Main issue 14: The policy does not define what constitutes an up to date SHMA. Persimmon Homes also endorse representation submitted by HBF.	Persimmon Homes (Rep ID: 26424)

Policy CS10 – Ipswich Garden Suburb

Main Issue	Representations
Main issue 1: The 'improvements to Fonnereau Way' listed in Table 8B need to ensure the route is safe for pedestrians as it is currently not safe.	Mr and Mrs Fred Lewis (Rep ID: 26188)
Main issue 2: NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Despite the relatively large size of the garden suburb development, primary care will be provided for the new patients at both Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26211)
Main issue 3: Remove "healthcare provision" from policy wording for the district centre element and update to reflect the absorption of capacity at Tooks/ Two Rivers Medical Centres instead.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26211)
Main issue 4: The existing route through Broadacres at the northern end of Fonnereau Way does not meet the provisions of the NPPF or Section 18 of the Crime and Disorder Act 1998. The SPD represents an opportunity to phase out this unsafe route and eradicate the threat of crime, vandalism and anti-social behaviour by keeping the route within the Country Park.	D Wiseman (Rep ID: 26251)
Main issue 5: Table 8B: Unclear whether infrastructure improvements to Fonnereau Way relate to exiting route currently defined or amended route within country park.	D Wiseman (Rep ID: 26253)
Main issue 6: Concerns regarding the reference to 'dual use playing fields'. The policy requirement for outdoor sport should not include school playing fields. The requirement for replacement playing fields for Ipswich School must be in addition to the policy requirements for community outdoor sport provision.	Sport England (Rep ID: 26280)
Main issue 7: Landowner of Red House Farm supports continued allocation of land for residential development but objects to content of policy.	Constable Homes (Tom Cole) (Rep ID: 26297)
Main issue 8: The numbering of parcels on Figure 2 of policy is misleading as it implies sites should be delivered in numerical order.	Constable Homes (Tom Cole) (Rep ID: 26302)

Main Issue	Representations
Main issue 9: Site N3(b) Red House Farm can come forward independently and this should be reflected in the policy wording. Recommend policy is amended to outline how each parcel could come forward individually.	Constable Homes (Tom Cole) (Rep ID: 26302)
Main issue 10: Support protection of physical separation between Ipswich and Westerfield village. In line with Policy SCLP10.5 of the Suffolk Coastal Final Draft Local Plan. CS10 facilitates a country park towards the north of the Ipswich Garden Suburb and the Suffolk Coastal Final Draft Local Plan carries forward the allocation of land as part of the country park.	East Suffolk Council (Rep ID: 26394)
Main issue 11: More realistic affordable housing target needs to be given for IGS whole site considering existing permissions only requiring 5% and 4%.	Councillor Oliver Holmes (Rep ID: 26622)
Main issue 12: Quotes from SOCS and Portfolio Holder regarding impacts/ challenges (see attached)	Save Our Country Spaces (Rep ID: 26354)
Main issue 13: Concerns regarding air quality, flood risk vulnerability and biodiversity/ habitat loss.	Save Our Country Spaces (Rep ID: 26354)
Main issue 14: Future households will bear costs of management/ maintenance of drainage, levy new houses instead.	Save Our Country Spaces (Rep ID: 26354)
Main issue 15: Concerns on road network to cope with additional traffic without northern relief road.	Save Our Country Spaces (Rep ID: 26354) Northern Fringe Protection Group (Rep ID: 26532)
Main issue 16: Concerned bridges not built in time to secure HIF and permissions only require vehicle bridge on delivery of 699 homes, impossible before March 2022 (HIF). Bridge too narrow for all road users and needed for safety. Need contingency measures for alternative funding.	Save Our Country Spaces (Rep ID: 26354) Northern Fringe Protection Group (Rep ID: 26532)
Main issue 17: Delivery of roads must be compatible with traffic modelling. Modelling is hiding fact that Ipswich roads near IGS are already heavily congested with roads already operating at capacity at peak times. Modelling must identify when key junctions and links reach capacity and how congestion will be mitigated. Concerned that modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads, worsening air quality and no assessment of this factored in.	Save Our Country Spaces (Rep ID: 26354 & 26416) Northern Fringe Protection Group (Rep ID: 26532)

Main Issue	Representations
Main issue 18: Sewage infrastructure should be included. No agreed sewage infrastructure. If sewage infrastructure cannot be provided at the right time and right price for the IGS (as a whole) then IGS cannot be delivered in accordance with the Plan. All off-line sewage storage should be provided on-site.	Save Our Country Spaces (Rep ID: 26404) Northern Fringe Protection Group (Rep ID: 26532)
Main issue 19: Not clear what RAMS S106 payments agreed with CBRE and Crest as S106 not public. If no RAMS tariffs included this could be in breach of SPD and policies CS4, CS17 and DM31 of adopted CS. New CS unsound in relation to CS4 CS17 and DM8 as no means of funding the required.	Save Our Country Spaces (Rep ID: 26404) Northern Fringe Protection Group (Rep ID: 26532)
Main issue 20: Sizewell-C and Felixstowe 30% increase in trains not assessed (rail-freight). No AQA for IGS permissions.	Save Our Country Spaces (Rep ID: 26416) Northern Fringe Protection Group (Rep ID: 26532)
Main issue 21: Mersea Homes Ltd are broadly supportive of Policy CS10 and its various provisions, but in order to ensure effective delivery, there are three aspects of the policy that are considered to be unsound, as follows: 1. Elements of the detailed wording of the policy in relation to site specific matters and the role of the SPD, which relate to Effectiveness; 2. The Affordable Housing provisions, which relate to soundness issues in respect of the justification and the effectiveness of the Policy; 3. The wording of the Policy in respect of viability review provisions. Please see full representation text for proposed amendments.	Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26330)
Main issue 22: As the delivery rate at Ipswich Garden Suburb has been overestimated, significantly more housing sites need to be identified to support the housing land supply.	Gladman Homes (Rep ID: 26415)
Main issue 23: support school allocations but DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue.	Department for Education (Rep ID: 26540)
Main issue 24: Support delivery of homes at IGS and associated infrastructure including 1,200 secondary school places.	Babergh and Mid Suffolk (Rep ID: 26453)

Policy CS11 – Gypsy and Traveller Accommodation

Main Issue	Representations
Main issue 1: The CCG will be happy to be involved in any proposed gypsy and traveller site discussions to ensure that the residents will be able to access primary care.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26212)
Main issue 2: Support this policy, specifically the amendment undertaken to paragraph 8.148 regarding flood risk.	Environment Agency (Rep ID: 26276)
Main issue 3: Support policy CS11 as being positively prepared. Support the provision of appropriate pitches to meet the identified need which will be secured through the policy.	West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council) (Rep ID: 26290)
Main issue 4: Support policy seeking to identify land within Borough for permanent Gypsy and Traveller pitches to meet identified need. Policy includes reference to developing short stay site between Ipswich and Felixstowe - should apply flexibility in meeting short stay needs to be consistent with approach in Statement of Common Ground.	East Suffolk Council (Rep ID: 26397)
Main issue 5: Object to soundness. Ipswich need to find 27 permanent pitches to 2036. No contact has been made with IBC regarding permanent provision.	Babergh and Mid Suffolk (Rep ID: 26454)

Policy CS12 – Affordable Housing

Main Issue	Representations
Main issue 1: Unsound and not consistent with national policy. The phrase 'at least 15%' does not provide the necessary clarity for applicants and decision makers and should be removed.	Home Builders Federation (Rep ID: 26303)
Main issue 2: Unsound and not consistent with national policy. The viability assessment may have underestimated the level of abnormal costs that occur when developing brownfield sites. The Council may need to consider a lower affordable housing requirement on brownfield sites or amend other policy requirements.	Home Builders Federation (Rep ID: 26350)
Main issue 3: Support inclusion of up to date definitions of affordable housing in CS8 and CS12, as set out in Annex 2 of the framework.	Rentplus UK (Rep ID: 26358)
Main issue 4: Recommend a focused update to the SHMA is prepared to inform policy and planning decisions, which would assess needs for products such as affordable rent-to-buy. Supporting text	Rentplus UK (Rep ID: 26368)

Main Issue	Representations
should be added to CS12, committing to keeping the SHMA up to date.	
Main issue 5: Note requirement for major new development to provide 15% affordable housing and welcome the flexibility within the wording both in respect of the proportion of affordable housing and tenure mix where development viability justifies it.	Associated British Ports (Rep ID: 26471)
Main issue 6: Generally supportive of CS12. Welcome acknowledgement that it may not always be viable to provide full affordable housing provision.	Cardinal Lofts (Mill) Ltd (Rep ID: 26558)
Main issue 7: The plan allocates a total of 1,647 affordable dwellings (assuming 30% IGS and ISPA4 and 15% on all other sites including windfall). In all likelihood this is overly optimistic given that most windfall sites are likely to be small and fall below the threshold set in Policy CS12. Based on the 239 dwellings per year in the SHMA, this would result in 38% of the affordable need. This is insufficient. Contrary to NPPF 20 and PPG.	Bloor Homes (Strutt and Parker) (Rep ID: 26585)
Main issue 8: The Site can come forward to provide market and affordable housing to assist with meeting the need, working with East Suffolk.	Bloor Homes (Strutt and Parker) (Rep ID: 26585)
Main issue 9: The approach will not meet affordable housing needs. Additional housing land needs to be allocated within neighbouring districts.	Gladman Homes (Rep ID: 26417)

Policy CS13 – Planning for Jobs Growth

Main Issue	Representations
Main issue 1: Recommend reducing land allocation to reflect actual need. Land allocation should be consistent with needs identified in Evidence Base (23.2ha). When compared with total land allocated for employment use (28.34ha) under Policy SP5, there is a significant excess of requirement. Even allowing for flexibility, the excess is not justified. Allocations require further review to ensure consistency with Evidence Base and to achieve soundness.	AquiGen (Rep ID: 26436)
Main issue 2: Support inclusion of reference at sub-point b. to the need to protect “land for employment uses in existing employment areas defined on the policies map, including the function and strategic	Associated British Ports (Rep ID: 26472)

Main Issue	Representations
role of the port to Ipswich” in response to ABP’s specific request for such reference at Preferred Options.	
Main issue 3: The Council should be aspirational and seek to increase jobs growth not reduce it.	Gladman Homes (Rep ID: 26418)

Policy CS14 – Retail Development and Main Town Centre Uses

Main Issue	Representations
Main issue 1: We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets).	Northern Fringe Protection Group (Rep ID: 26513) Save Our Country Spaces (Rep ID: 26388)

Policy CS15 – Education Provision

Main Issue	Representations
Main issue 1: The secondary school site at the Ipswich Garden Suburb should be referenced in the same way as primary school sites i.e. as a broad location (or, as per our representations to the Policies Map, all allocations within the IGS should be removed). Please see full representation text for proposed amendments.	Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26309)

Policy CS16 – Green Infrastructure

Main Issue	Representations
Main issue 1: The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26213)
Main issue 2: Support as previous comments (Reg 18) addressed.	Environment Agency (Rep ID: 26277)
Main issue 3: Support approach of working with partners in respect of the RRAMS and new country park with the IGS. Support joint working to deliver strategic green infrastructure, in particular, the establishment of a green trail around Ipswich which is reflected in the Suffolk Coastal Final Draft Local Plan.	East Suffolk Council (Rep ID: 26400)

Main Issue	Representations
Main issue 4: In order for the plan to be sound there should be an explicit recognition that, on high density sites within the IP-One Area, and particularly along the Waterfront, it won't be possible to make full provision for private, and public, open space, in accordance with the Council's standards.	Cardinal Lofts (Mill) Ltd) (Rep ID: 26559)
Main issue 5: Assessing Green Infrastructure, Sport and Recreation need should take account of future residents and changing desires/habits of the residents over time.	Councillor Oliver Holmes (Rep ID: 26624)
Main issue 6: Object to change from green rim to green trail. Change in name is misleading and is actually to bring forward land at Humber Doucy Lane for development. Non-compliant with DM8. See appendix 1 for history of the green rim/ corridors. No mention of the green rim/ trail being used in the Ipswich Cycling Strategy	Save Our Country Spaces (Rep ID: 26401) Northern Fringe Protection Group (Rep ID: 26520)
Main issue 7: Tuddenham Road/Westerfield green corridors are home to significant number of recorded protected species (great crested newts, badgers, hedgehogs, bats and all manner of species) as well as birds, flora/ fauna; Southern Marsh and bee orchids found on the Fynn Valley and adjacent area. Due to private ownership, there is little interest for formal surveys due to landowners aspirations for land use. SWT done some work within Red House Ipswich, the Fynn Valley CWS; a Hedgerow Survey of the whole IGS area completed. Active badger sets reported.	Save Our Country Spaces (Rep ID: 26352) Northern Fringe Protection Group (Rep ID: 26520)
Main issue 8: The policy needs to be clear that new development should meet the needs arising from that development, having regard to the Council's standards, and should not be required to remedy existing deficits. Please see full representation text for suggested amendments.	Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26308)
Main issue 9: Support collaborative working on the RAMS, but need to ensure that RAMS contributions are spent to mitigate the impact from the development that generated the need for RAMS contributions	Babergh and Mid Suffolk (Rep ID: 26460)

Policy CS17 – Delivering Infrastructure

Main Issue	Representations
<p>Main issue 1: The inclusion of GP surgeries and health centres as key strategic infrastructure is to be commended as this will allow the CCG to strategically plan ahead with the understanding that providing the business case is sustainable it will more likely get approval. NHS England has now provided instructions that all health providers should be looking to request mitigation through S106 or CIL as part of the planning application response process. As part of this process, developments over 250 dwellings will automatically go to the Alliance partners in health for them to make representation and request mitigation.</p>	<p>Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26214)</p>
<p>Main issue 2: Acute hospital facilities require referencing in policy wording.</p>	<p>East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26265)</p>
<p>Main issue 3: Categories broadly in line with infrastructure commitments in the Suffolk Coastal Final Draft Local Plan. Policy refers to infrastructure to be secured from new development including early years provision, but it is not clear in Table 8A whether early years provision in north east Ipswich is identified as an infrastructure priority, consistent with the Statement of Common Ground. Council has included criterion within SCLP12.24 for provision of early years setting on site, if needed. Recommend that this is replicated in ISPA4.</p>	<p>East Suffolk Council (Rep ID: 26405)</p>
<p>Main issue 4: Financing infrastructure through developer contributions is difficult in Ipswich as net profit margins are low and contributions are challenged by developers on viability grounds. The Draft needs to reflect this difficulty otherwise it is unsound.</p>	<p>Councillor Oliver Holmes (Rep ID: 26625)</p>
<p>Main issue 5: Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM 8 as no means of funding the required.</p>	<p>Save Our Country Spaces (Rep ID: 26410) Northern Fringe Protection Group (Rep ID: 26528)</p>
<p>Main issue 6: No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. The 13 transport projects need to be included in the Infrastructure Tables. If any of projects</p>	<p>Save Our Country Spaces (Rep ID: 26535) Northern Fringe Protection Group (Rep ID: 26536)</p>

Main Issue	Representations
aren't delivered by the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates. Bramford Road/ Sproughton Road link road must be included.	
Main issue 7: Clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth.	Department for Education (Rep ID: 26541)
Main issue 8: Support collaborative working on the RAMS, but need to ensure that RAMS contributions are spent to mitigate the impact from the development that generated the need for RAMS contributions	Babergh and Mid Suffolk (Rep ID: 26459)

Policy CS18 – Strategic Flood Defence

Main Issue	Representations
Main issue 1: Support IBC's positive commitment to delivery and funding of mitigation through a transport mitigation strategy as part of collaborative working through the ISPA board. Potential measures outlined in CS20 are consistent with the Suffolk County Council's Transport Mitigation Strategy.	East Suffolk Council (Rep ID: 26412)

Policy CS19 – Provision of Health Services

Main Issue	Representations
Main issue 1: The support of primary care infrastructure is very welcome but due to a number of factors adhering to the policy of building near the town centre, district or local centre will be difficult. GP surgeries have catchment areas and these might conflict with your district or local centres. Primary Care Networks (PCNs) are being introduced to provide a variety of services through a number of surgeries working together and this could influence the location of any new health facility.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26215)
Main issue 2: Paragraph 8.231; As participants in the Ipswich and East One Public Estate (OPE) the platform is available to make sure that all public buildings are fully utilised. Aside from OPE	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26216)

Main Issue	Representations
all of the local health partners meet as part of an Integrated Care System (ICS) and the re-use of sites no longer required by a provider is discussed and only after extensive study would a building be permitted for non-public uses.	
Main issue 3: Paragraph 8.232; The CCG does have plans and work is ongoing regarding provision of primary care in and around Ipswich. A number of feasibility studies are currently taking place with the goal of finding an estates strategy for Ipswich that covers the period of the plan.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26217)
Main issue 4: Policy as drafted is overly restrictive and inflexible. Fails to reflect legal or procedural requirements. Does not enable ESNEFT to realise its development requirements. Contrary to NPPF paragraph 35. Amendments needed and recommended.	East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26263)
Main issue 5: Last sentence of 8.229 requires deletion as it's beyond LPA remit. Additional wording needed to demonstrate other ancillary uses. Paragraph 8.230 requires amendment to link parking issues to those directly associated with proposed hospital activity. Amendments needed and recommended.	East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26264)

Policy CS20 – Key Transport Proposals

Main Issue	Representations
Main issue 1: Suggest addition of criteria (i) “improvements to the rail line” to policy CS20 to make it effective. This will enable matters such as the Ipswich to Cambridge rail line to remain a strategic priority.	West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council) (Rep ID: 26291)
Main issue 2: Object to reference to requirement of road bridge to enable development at the Island Site. Not appropriate to be so prescriptive. Request removal of: “at a minimum, a road bridge from the west bank to the Island Site...will be required to enable any significant development on the Island”.	Associated British Ports (Rep ID: 26473)
Main issue 3: Measures including A14 improvements and park and ride provision, are potentially feasible, however, funding is an issue as there is no certainty of future Highways England capital funding programme funding.	Highways England (Rep ID: 26601)
Main issue 4: Generally supportive of Policy CS20.	Highways England (Rep ID: 26589)

Main Issue	Representations
Main issue 5: Transport is an area of weakness, and there is no evidence that Suffolk will provide any major infrastructure during Plan period. Therefore, all development will add to existing congestion with no reductions in carbon and increase in pollution and AQMAs. Makes Draft unsound on a fundamental level. Argument for no development until effective town wide mitigation strategy is in place.	Councillor Oliver Holmes (Rep ID: 26627)
Main issue 6: IBC is failing to Improve Access in breach of CS20. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport	Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495)
Main issue 7: Concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered.	Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26511)
Main issue 8: Disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base.	Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495) Suffolk County Council (Rep ID: 26574)
Main issue 9: New infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary.	Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26511)
Main issue 10: See detailed comments on Transport Modelling and Mitigation Strategy (pages 26 - 32).	Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495)
Main issue 11: Paragraph 8.220 needs to be amended to read "Air Quality Management Areas are designated in areas where poor air quality will have an effect on people's health". Failure to recognise this undermines the soundness of the Plan.	Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495)
Main issue 12: IBC must explain why elected leader believes Ipswich cannot cope with existing volumes of traffic and that it's sound to increase traffic.	Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)
Main issue 13: Needs to recognise that SCC is concerned about traffic volume management and announced that it's establishing a taskforce to look at new ways of tackling the town's traffic.	Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)
Main issue 14: TUOC and Northern Route not proceeding.	Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)
Main issue 15: ISPA modelling needs to include additional highway schemes (see list).	Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)

Main Issue	Representations
Main issue 16: Object to soundness. Object to reference to an Ipswich Northern Route, as this is no longer supported by Babergh and Mid Suffolk.	Babergh Mid Suffolk (Rep ID: 26462)
Main issue 17: Object to soundness. Paragraph 8.240 needs to be amended to include reference to the respective local planning authorities agreeing the detailed measures, costings and a mechanism for collecting contributions for planned growth in respect of the Transport Mitigation Strategy, the current policy text only refers to agreement being sought through the ISPA Board.	Babergh Mid Suffolk (Rep ID:26461)

4. Part C – Development Management Policies

Main Issue	Representations
Main issue 1: RSPB supports references to measures for swift conservation within DM policies and SPDs, particularly within DM8 and DM12.	RSPB (Rep ID: 26292)
Main issue 2: Plan not radical enough. Require change in modal shift and improved cycling and walking infrastructure. Rural bus services should be prioritised over park and ride schemes. Policy doesn't include references to reducing rat running on residential roads, increasing use of 20mph speed limits, or implementing protected cycle tracks. Proposals likely to have little effect on walking and cycling levels.	Cycle Ipswich (Rep ID: 26551)

Policy DM1 – Sustainable Construction

Main Issue	Representations
Main issue 1: Re-write Policy to take account of the national zero carbon target of 2050. Although carbon for new builds will be less than under previous standards, the level of emissions under this policy will still increase during the plan period. The default position should be zero carbon.	Councillor Oliver Holmes (Rep ID: 26628)
Main issue 2: The Climate Emergency Declaration needs to be referenced.	Save Our Country Spaces (Rep ID: 26407) Northern Fringe Protection Group (Rep ID: 26526)

Policy DM2 – Decentralised Renewable or Low Carbon Energy

Main Issue	Representations
Main issue 1: Policy should apply to all new builds. A 15% target is unlikely to be lawful under the net zero 2050 national objective and should be increased. Fails to consider national policy on prohibiting gas boilers after 2025. Extensions to residential property (including permitted development) will need to be compliant. Policy should make it clear that permission will be refused unless compliant.	Councillor Oliver Holmes (Rep ID: 26631)
Main issue 2: The Climate Emergency Declaration needs to be referenced.	Save Our Country Spaces (Rep ID: 26408) Northern Fringe Protection Group (Rep ID: 26527)

Policy DM3 – Air Quality

Main Issue	Representations
Main issue 1: Concern raised about a lack of sufficient investment and actions proposed in the plan to deliver the modal shift required to improve air quality and reduce carbon emissions in the town.	Clean Air Ipswich (Rep ID:26312)
Main issue 2: Note IBC's air quality screening study which has considered growth across the ISPA. Council would note that there are potential linkages with the mitigation outlined to deliver modal shift through an ISPA transport mitigation strategy.	East Suffolk Council (Rep ID: 26421)
Main issue 3: Poor air quality in AQMAs is a result of road traffic. Mitigation needs to include restriction on operational parking in commercial development. All new residential development needs to include significant contributions towards sustainable transport options. Increase in emissions in AQMAs and further AQMAs declared during the plan period cannot be allowed.	Councillor Oliver Holmes (Rep ID: 26633)
Main issue 4: Transport Modelling includes challenging modal shift assumptions. Unless evidence of funding and plans to improve the ineffective cycling network provided, the levels of modal shift unreachable. Contrary to NPPF 181. CS needs to make clear commitment to improving air quality and compliance with legally binding air pollution targets. Fails to follow Government's guidelines and waters down Government requirements. Flaws in WSP Source Apportionment Study. New modelling needs to address issues and focus on air quality in first 10 years	Save Our Country Spaces (Rep ID: 26414) Northern Fringe Protection Group (Rep ID: 26530)

Main Issue	Representations
Main issue 5: No Air Quality Assessment provided as part of this consultation, unacceptable. Reserve right to comment on this.	Save Our Country Spaces (Rep ID: 26414) Northern Fringe Protection Group (Rep ID: 26530)
Main issue 6: No Air Quality Assessment for IGS.	Save Our Country Spaces (Rep ID: 26414) Northern Fringe Protection Group (Rep ID: 26530)

Policy DM4 – Development and Flood Risk

Main Issue	Representations
Main issue 1: At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. The SFRA has not yet been agreed as the River Gipping fluvial model is not yet verified and ready for use. A statement of common ground will be prepared if required and will continue to work in partnership with IBC on the SFRA. Paragraph 9.4.10 needs to make reference to the SFRA as a living document.	Environment Agency (Rep ID: 26279)
Main issue 2: The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents. (see image of better map to illustrate.)	Save Our Country Spaces (Rep ID: 26372) Northern Fringe Protection Group (Rep ID: 26500)
Main issue 3: Delete 'where practicable' from DM4 clause a). Continue work on emerging SFRA.	Suffolk County Council (Rep ID: 26593)

Policy DM5 – Protection of Open Spaces, Sport and Recreation

Main Issue	Representations
Main issue 1: The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26218)
Main issue 2: Support the revisions to the policy based on comments raised at Preferred Options.	Sport England (Rep ID: 26281)

Policy DM6 – Provision of New Open Spaces, Sport and Recreation Facilities

Main Issue	Representations
Main issue 1: The policy is supported.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26219)
Main issue 2: In order for the Plan to be sound there should be an explicit recognition that, on higher density, previously developed sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council's standards.	Cardinal Lofts (Mill) Ltd (Rep ID: 26560)

Policy DM7 – Provision of Private Outdoor Amenity Space in New and Existing Developments

Main Issue	Representations
Main issue 1: In order for the Plan to be sound there should be an explicit recognition that, in respect of high density, previously developed sites, it may not always be possible to make full provision for private amenity space to accord with the Council's standards.	Cardinal Lofts (Mill) Ltd (Rep ID: 26561)
Main issue 2: The policy is unsound as is not consistent with national policy or justified. The policy is too prescriptive, Ipswich is highly constrained. To meet Ipswich's housing requirement more flexibility is required.	Home Builders Federation (Rep ID: 26299)
Main issue 3: Minimum standard areas for private outdoor amenity space are not adequately justified and are not consistent with national policy. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26428)

Policy DM8 – The Natural Environment

Main Issue	Representations
Main issue 1: Support objectives of policy.	AONB Unit (Rep ID: 26254)
Main issue 2: European Protected Sites are now called Habitats Sites and policy needs to be amended accordingly.	AONB Unit (Rep ID: 26254)
Main issue 3: Consultation module title for DM8 incorrect.	AONB Unit (Rep ID: 26256)
Main issue 4: Support policy and approach. However, equivalent policy within the Suffolk Coastal Final Draft Local Plan refers to the RAMS, and as such provides a development management policy approach to implementing the strategy which has been worked up on a cross-boundary basis. To be effective, DM8 could be strengthened	East Suffolk Council (Rep ID: 26422)

Main Issue	Representations
through reference to securing contributions to facilitate the implementation of the strategy.	
Main issue 5: Delete conditions a. and c. to reflect NPPF paragraph 175b which only allows for benefits outweighing impacts.	Suffolk Wildlife Trust (Rep ID: 26317)
Main issue 6: Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it. Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM8 as no means of funding the required.	Save Our Country Spaces (Rep ID: 26409) Northern Fringe Protection Group (Rep ID: 26529)

Policy DM9 – Protection of Trees and Hedgerows

No Main Issues.

Policy DM10 – Green Corridors

Main Issue	Representations
Main issue 1: The Green Corridors identified are not interlinked and there is no coherent walking/ cycling route.	Andrea McDonald (Rep ID: 26202)
Main issue 2: Green Corridor F could be extended beyond what is shown. See suggested route. Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F. If these sites are fully developed, this ecological network would be interrupted.	Suffolk Wildlife Trust (Rep ID: 26326)
Main issue 3: Object to change from green rim to green trail as this is misleading and is to allow development at Humber Doucy Lane.	Save Our Country Spaces (Rep ID: 26351) Northern Fringe Protection Group (Rep ID: 26519)
Main issue 4: Tuddenham Road/Westerfield green corridors are home to significant number of recorded protected species (great crested newts, badgers, hedgehogs, bats and all manner of species) as well as birds, flora/ fauna; Southern Marsh and bee orchids found on the Fynn Valley and adjacent area. Due to private ownership, there is little interest for formal surveys due to landowners aspirations for land use. SWT done some work within Red House	Save Our Country Spaces (Rep ID: 26351) Northern Fringe Protection Group (Rep ID: 26519)

Main Issue	Representations
Ipswich, the Fynn Valley CWS; a Hedgerow Survey of the whole IGS area completed. Active badger sets reported.	

Policy DM11 – Countryside

Main Issue	Representations
Main issue 1: The policy does not relate to development within the setting of the AONB and requires amendment to acknowledge this.	Suffolk Preservation Society (Rep ID: 26244)
Main issue 2: Change to policy requested at Preferred Options undertaken and supported.	AONB Unit (Rep ID: 26255)

Policy DM12 – Design and Character

Main Issue	Representations
Main issue 1: Support policy as it promotes multi-functional uses.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26220)
Main issue 2: Welcome the importance attached to open spaces.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26220)
Main issue 3: Support the revisions to the policy based on comments raised at Preferred Options.	Sport England (Rep ID: 26282)
Main issue 3: Support the accessibility standard M4(2) but 'waiver' wording needs to be firmer and the policy should include a requirement for 10% M4(3) wheelchair accessible housing.	Habinteg Housing Association (Rep ID: 26272)
Main issue 4: Support desire for new development to be well designed and sustainable, for 25% of new dwellings to be built to Building Regulations standard M4(2), and for proposals to respect the character and distinctiveness of Ipswich, however, this should not be at the expense of development viability. Policy should be applied flexibly in the context of the objective to achieve sustainable regeneration.	Associated British Ports (Rep ID: 26474)
Main issue 5: Point d. there should be an inclusion of the potential for installation of green roofs and walls as part of the strategy to introduce greener streets and spaces.	Suffolk Wildlife Trust (Rep ID: 26318)
Main issue 6: No justification has been provided for the need for 25% of all housing on major developments to be designed to Part M4(2). Figure could be too high. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26430)

Policy DM13 – Built Heritage and Conservation

Main Issue	Representations
Main issue 1: Object to reference of “the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area”. Strongly resist any steps to withdraw permitted development rights. If this does not encompass rights enjoyed by ABP, specific clarification should be included.	Associated British Ports (Rep ID: 26475)
Main issue 2: Generally supportive of objectives set out in Policy DM13 and satisfied with revised wording.	Cardinal Lofts (Mill) Ltd (Rep ID: 26562)
Main issue 3: We strongly object to the re-designation of the Ipswich “green rim” to “green trails”. This is in breach of DM13 and unsound.	Save Our Country Spaces (Rep ID: 26372) Northern Fringe Protection Group (Rep ID: 26499)
Main issue 4: Note the changes to this policy following our Regulation 18 advice.	Historic England (Rep ID: 26668)

Policy DM14 – Archaeology

Main Issue	Representations
Main issue 1: Welcome the changes to this policy following our Regulation 18 advice.	Historic England (Rep ID: 26669)

Policy DM15 – Tall Buildings

Main Issue	Representations
Main issue 1: The RSPB believes that the failure to include their suggestion regarding integrated swift bricks within Policy DM15 could constitute a failure in the Council’s ‘Duty to conserve biodiversity’ under Section 40 of the Natural Environment and Rural Communities Act.	RSPB (Rep ID: 26294)
Main issue 2: Object to exclusion of IP035 from the ‘arc of land’, where tall buildings may be appropriate, as shown on IP-One Area Inset Proposals Map. Costs of developing IP035 are such that high-density development, potentially involving ‘tall buildings’, will be required.	Cardinal Lofts (Mill) Ltd (Rep ID: 26563)
Main issue 3: A criterion K should be added, as requested by RSPB previously, to incorporate integrated swift boxes to help meet the biodiversity net gain requirements.	Suffolk Wildlife Trust (Rep ID: 26320)
Main issue 4: Support changes to Policy DM15, but request criterion ‘i’ is amended.	Historic England (Rep ID: 26667)

Main Issue	Representations
Remain concerned that the tall building arc still includes a significant area within the setting of the Grade I Listed Willis Building. One of its most striking features is its curvilinear glass curtain walling that reflects the surrounding buildings. Any new tall building therefore has the potential to impact on the setting, and therefore significance of this important building, and on this basis, we advise pulling back the arc boundary in the immediate vicinity. Our Tall buildings advice note provides more information.	

Policy DM16 – Extensions to Dwellings and the Provision of Ancillary Buildings

Main Issue	Representations
Main issue 1: Policy needs to include a reference to zero carbon to take account of the national zero carbon target of 2050.	Councillor Oliver Holmes (Rep ID: 26634)

Policy DM17 – Small Scale Infill and Backland Residential Developments

Main Issue	Representations
Main issue 1: A point should also be made to deny permission for any development which could result in an unacceptable loss of semi-natural habitat, which could be important in its own right, or support protected and/or priority species.	Suffolk Wildlife Trust (Rep ID: 26575)

Policy DM18 – Amenity

Main Issue	Representations
Main issue 1: Policy does not cite recognised technical guidance on overlooking, which would help to provide continuity in the assessment of the issue. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26429)

Policy DM19 – The Subdivision of Family Dwellings

No main issues.

Policy DM20 – Houses in Multiple Occupation

Main Issue	Representations
Main issue 1: Support.	Save Our Country Spaces (Rep ID: 26480)

Main Issue	Representations
	Northern Fringe Protection Group (Rep ID: 26537)

Policy DM21 – Transport and Access in New Developments

Main Issue	Representations
Main issue 1: Would prefer the requirement for electric vehicle charging points to be implemented through the Building Regulations rather than through local planning policy.	Home Builders Federation (Rep ID: 26295)
Main issue 2: Policy lacks clarity, it does not state the amount of charging point and the type of provision sought. The requirement should be evidenced with regard to the technical feasibility and financial viability.	Home Builders Federation (Rep ID: 26355)
Main issue 3: Object to removal criterion a. Specifically; “rights of way or the local road network in respect of traffic capacity” must be reinstated as walking/ cycling shouldn't be reduced as traffic congestion is a major problem and local new developments shouldn't negatively impact. Changes conflict with CS5	Save Our Country Spaces (Rep ID: 26481) Northern Fringe Protection Group (Rep ID: 26538)
Main issue 4: Support change regarding highway safety (criterion B). However IGS is non-compliant as failed to assess impacts of development on air quality. Revised assessment of air quality impacts of IGS urgently required before commencement.	Save Our Country Spaces (Rep ID: 26481) Northern Fringe Protection Group (Rep ID: 26538)
Main issue 5: Unclear how ‘severe’ and ‘significant’ impacts defined. Maximum legal limits for particulates and nitrous oxides, and this should be ‘significant’.	Save Our Country Spaces (Rep ID: 26481) Northern Fringe Protection Group (Rep ID: 26538)
Main issue 6: Whilst no objections are raised in respect of the majority of the provisions of this policy, we are concerned that a requirement that all new development should have access to public transport within 400m is neither justified (in terms of its being a fixed requirement) nor likely to mean that the Plan is effective overall in delivering the number of new homes required, because there are some locations where a strict adherence to 400m is unlikely to be achievable. Please see full representation text for proposed changes.	Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26307)
Main issue 7: Travel plan references need updating and thresholds aligning with SCC Guidance.	Suffolk County Council (Rep ID: 26576)
Main issue 8: The HBF would prefer the requirement for electric vehicle charging	Home Builders Federation (Rep ID: 26295)

Main Issue	Representations
points to be implemented through the Building Regulations.	
Main issue 9: Part c is unsound and has not been justified. Policy lacks clarity, it does not state the amount of charging point and the type of provision sought. The requirement should be evidenced with regard to the technical feasibility and financial viability.	Home Builders Federation (Rep ID: 26295)

Policy DM22 – Car and Cycle Parking in New Development

Main Issue	Representations
Main issue 1: Support IBC’s qualification that it will not insist on the requirement to meet Nationally Described Space Standards if this is demonstrated to be unviable in specific cases.	Associated British Ports (Rep ID: 26476)
Main issue 2: Generally supportive of Policy. Welcome recognition that many people still own cars and that adequate levels of residential parking needs to be provided as part of new residential schemes.	Cardinal Lofts (Mill) Ltd (Rep ID: 26564)
Main issue 3: Extend the Central Car Parking Core to the whole of IP-One. Provide more examples of operational car parking.	Suffolk County Council (Rep ID: 26584)
Main issue 4: Policy is unsound as it is not consistent with national policy. Required standards for car and cycle parking are not set out in the policy.	Home Builders Federation (Rep ID: 26293)

Policy DM23 – The Density of Residential Development

Main Issue	Representations
Main issue 1: Generally supportive of Policy. Welcome support for high densities of residential development in the Portman Quarter and Waterfront areas.	Cardinal Lofts (Mill) Ltd (Rep ID: 26565)
Main issue 2: Part (c) of the policy as drafted would not be effective as there is no practical means for ensuring an average of 35 dph across multiple sites, and no justification for stipulating 35 dph on any particular individual site, and no justification for "low-density development" per se. Please see full representation text for amendments.	Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26306)
Main issue 3: A prescriptive approach in the interpretation of the policy would limit	Persimmon Homes (Rep ID: 26427)

Main Issue	Representations
opportunities to respond to market forces. Persimmon also endorse the statement made by the HBF.	

Policy DM24 – Protection and Provision of Community Facilities

Main Issue	Representations
Main issue 1: The aim is for all of the health providers in the area of Ipswich to provide an Infrastructure Delivery Plan (IDP). This document will allow all of the interested parties to work cohesively in identifying land and properties that are surplus to requirements and contrarily, if land acquisition could be required.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26221)

Policy DM25 – Shopfront Design

No main issues.

Policy DM26 – Advertisement

No main issues.

Policy DM27 – The Central Shopping Area

Main Issue	Representations
Main issue 1: Appreciate efforts by Council to move towards greater flexibility within Central Shopping Area, however, recommend change to policy position for Primary Shopping Zones to include D2 and C1. Such uses can provide active frontages and as such should not be excluded.	Threadneedle UK (Rep ID: 26466)

Policy DM28 – Arts, Culture and Tourism

Main Issue	Representations
Main issue 1: Suggest minor amendment to Appendix 6 (paragraph 2.2) to require applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. Subject to this amendment, the policy meets the tests of soundness.	Theatres Trust (26236)

Policy DM29 – The Evening and Night-time Economy

No main issues.

Policy DM30 – District and Local Centres

No main issues.

Policy DM31 – Town Centre Uses Outside the Central Shopping Area

No main issues.

Policy DM32 – Retail Proposals Outside Defined Centres

Main Issue	Representations
<p>Main issue 1: Object to criterion (a) requiring consideration of the appropriateness of scale when assessing out-of-centre retail proposals. Use of 'scale' is no longer recommended by NPPF which only requires an applicant to demonstrate compliance with the Sequential Approach and Impact. In addition, requirement to demonstrate scale not identified by the Evidence Base. Therefore, recommend removal of criterion (a).</p>	<p>AquiGen (Rep ID: 26435)</p>

Policy DM33 – Protection of Employment Land

Main Issue	Representations
<p>Main issue 1: Concern that policy only allows for consideration of no reasonable prospect of re-use for employment purposes for sites outside the Employment Areas. Ambiguity in the supporting paragraphs as 9.32.2 and 9.32.4 suggest that the no reasonable prospect test could be applied to Employment Area land. Recommend DM33 is amended to allow test to be applied to all defined Employment Area land to ensure plan is consistent with national guidance and flexible to deal with changing market needs. Important given surplus allocation.</p>	<p>AquiGen (Rep ID: 26431)</p>
<p>Main issue 2: Support safeguarding of the operational areas of the Port through their definition as Employment Areas and welcome recognition of the need for ABP's specific operational requirements and consents and licences for the handling and storage of hazardous substances to be taken into account in any development planned in the vicinity of these areas.</p>	<p>Associated British Ports (Rep ID: 26477)</p>
<p>Main issue 3: Support the wording of the policy but the land North of Burrell Road needs to be allocated for residential development.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26650)</p>

Policy DM34 – Delivery and expansion of Digital Communications Network

Main Issue	Representations
Concerned about potential impacts of new 5G technology and other telecoms equipment on the AONB. Amendment to criterion b sought.	AONB Unit (Rep ID: 26257)

5. Part D: Implementation, Targets, Monitoring and Review

Chapter 10 – Implementation

Main Issue	Representations
Main issue 1: The 'improvements to Fonnereau Way' listed in Table 8B need to ensure the route is safe for pedestrians as it is currently not safe.	Mr & Mrs Fred Lewis (Rep ID: 26189)
Main issue 2: Table 8B refers to a "new health centre." NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Mitigation for the increase in patients from the proposed Ipswich Garden Suburb will be spread between Two Rivers Medical Practice and the new healthcare facility at Tooks.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26223)
Main issue 3: Table 8B: Unclear whether infrastructure improvements to Fonnereau Way relate to exiting route currently defined or amended route within country park.	D Wiseman (Rep ID: 26249)
Main issue 4: Table 8B: The existing route through Broadacres at the northern end of Fonnereau Way does not meet the provisions of the NPPF or Section 18 of the Crime and Disorder Act 1998. The SPD represents an opportunity to phase out this unsafe route and eradicate the threat of crime, vandalism and anti-social behaviour by keeping the route within the Country Park.	D Wiseman (Rep ID: 26250)
Main issue 5: Acute hospital facilities require referencing in table 8B.	East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26266)
Main issue 6: No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.	Save Our Country Spaces (Rep ID: 26379) Northern Fringe Protection Group (Rep ID: 26517)
Main issue 7: The 13 transport projects need to be included in the Infrastructure Tables. If any of projects aren't delivered by	Save Our Country Spaces (Rep ID: 26379) Northern Fringe Protection Group (Rep ID: 26517)

Main Issue	Representations
the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates.	
Main issue 8: Bramford Road/ Sproughton Road (IP029) link road must be included.	Save Our Country Spaces (Rep ID: 26379) Northern Fringe Protection Group (Rep ID: 26517)
Main issue 9: Table 8a needs updating to clarify the contributions expected from development and specific early years and education requirements.	Suffolk County Council (Rep ID: 26573)

Chapter 11 – Key Targets associated with Part B

No main issues.

Chapter 12 – Monitoring and Review

No main issues.

6. Part E: Appendices

Appendix 1 – A List of Policies Included in this Document

No main issues.

Appendix 2 – Community Facilities in District and Local Centres

No main issues.

Appendix 3 – Activities or Services Relevant to each Planning Standard Charge Heading

No main issues.

Appendix 4 – Ipswich Standards for the Provision of Open Space, Sport and Recreation Facilities

No main issues.

Appendix 5 – Glossary

No main issues.

Appendix 6 – Marketing Requirements

Main Issue	Representations
<p>Main issue 1: Suggest paragraph 2.2 requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. This would prevent applicants undermining the policy objective by superficially addressing policy, for example listing with small agents in other parts of the country or listing commercial property with residential agents.</p>	<p>Theatres Trust (Rep ID: 26240)</p>
<p>Main issue 2: Aspects of marketing requirements are onerous and should be removed. Discussions with Council before marketing unnecessary if marketing requirements in Appendix 6 are followed. Welcome amendment to require simple schedule noting origin of enquiry and reason for interest is sufficient. Commercial site not generally marketed at set market value - "All Enquiries" exercise appropriate as it generates enquiries on all potential purchase options.</p>	<p>AquiGen (Rep ID: 26434)</p>

Appendix 7 – DM27 Central Shopping Area Maps

No main issues.

Plan 1 – District and Local Centres

No main issues.

Plan 2 – Flood Risk

Main Issue	Representations
<p>Main issue 1: The statement regarding fluvial flooding is incorrect as the plan shows both fluvial and tidal flooding.</p>	<p>Environment Agency (Rep ID: 26278)</p>
<p>Main issue 2: Request that Plan 2 and/or the Core Strategy and Policies Development Plan Document should include a note making clear that the flood zones shown on Plan 2 are indicative and that IBC will rely on the current Environment Agency Flood Maps to determine what flood risk zone any site may fall within for decision making purposes.</p>	<p>Associated British Ports (Rep ID: 26478)</p>

Plan 3 – Conservation Areas

No main issues.

Plan 4 – Area of Archaeological Importance

No main issues.

Plan 5 – Ipswich Ecological Network

Main Issue	Representations
Main issue 1: Green Corridor F could be extended beyond what is shown. See suggested route. Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F. If these sites are fully developed, this ecological network would be interrupted.	Suffolk Wildlife Trust (Rep ID: 26327)
Main issue 2: The map refers to Wildlife Audit 2012/2013, which is out-of-date (see 2019 update).	Suffolk Wildlife Trust (Rep ID: 26327)

Plan 6 – Green Corridors

Main Issue	Representations
Main issue 1: Arrows point towards parks/green areas, however not interconnected and there is no coherent walking or cycling route.	Andrea McDonald (Rep ID: 26204)
Main issue 2: Green Corridor F could be extended beyond what is shown. See suggested route. Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F. If these sites are fully developed, this ecological network would be interrupted.	Suffolk Wildlife Trust (Rep ID: 26327)

Plan 7 – Air Quality Management Areas

No main issues.

5.2 Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review

7. Legal Compliance, Introduction and General Comments

General Comments

Main Issue	Representations
Main issue 1: Noted that a number of policies in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft would support the delivery of transport mitigation in the ISPA. Particularly, the	East Suffolk Council (Rep ID: 26420)

Main Issue	Representations
potential provision for park and ride facilities under IP152, improvement to cycling and walking provision under SP15 and limiting congestion under SP17.	
Main issue 2: The plan is poorly prepared and presented and is very difficult to read. It lacks justification and its policies are neither useful to developers or decisionmakers. It is the most poorly presented plan in the region.	Ravenswood Environmental Group (Rep ID: 26331)
Main issue 3: It needs to demonstrate cross boundary working as happens in Greater Norwich and Greater Cambridge and it needs criteria based policies so that it can be held to account by the public and used successfully by developers. It is vague and the environmental impacts are not justified. Needs to be re-written	Ravenswood Environmental Group (Rep ID: 26331)
Main issue 4: The plan contains disjointed lists of sites and does nothing to assist decision makers to establish what is or is not acceptable or how various constraints would be overcome.	Ravenswood Environmental Group (Rep ID: 26331)

8. Part A – The Context

Chapter 2 – The Ipswich Local Plan

Main Issue	Representations
Main issue 1: Support this section of the Plan.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26651)

Chapter 3 – Vision and Objectives

No main issues.

9. Part B – The Policies

Policy SP1 – The Protection of Allocated Sites

Main Issue	Representations
Main issue 1: Support safeguarding of sites for the uses for which they have been allocated, subject to the recognition that where sites (such as the Island Site) are in existing use and are allocated for alternative use(s), redevelopment will be dependent on commercial viability.	Associated British Ports (Rep ID: 26479)

Policy SP2 – Land Allocated for Housing

Main Issue	Representations
<p>Main issue 1: Site IP034 (Wherstead Road) should be included as a residential allocation. Flooding assessments and consultation with the appropriate bodies has been carried out with no fundamental objections.</p>	<p>Salter and Skinner Partnership (Planning Direct) (Rep ID: 26181)</p>
<p>Main issue 2: Although support the inclusion of the allocation at Humber Doucy Lane within the Core Strategy document, it should also be included within the Site Allocations and Policies DPD. Omission is neither justified nor effective. Recommend additional line within Table 1 in relation to Humber Doucy Lane, and for the sake of completeness, Ipswich Garden Suburb should also be included. Recommend amendment to paragraph 4.7 wording.</p>	<p>Kesgrave Covenant (Rep ID: 26458)</p>
<p>Main issue 3: Support allocation for the Island Site and references that figures are indicative, however, believe that current indicative capacity of 421 homes is high. Consider that the Island Site will deliver a reduced density of approximately 150 units. Request removal of reference to need for “additional vehicular ... access (including emergency access)...to be provided to enable the site’s development”.</p>	<p>Associated British Ports (Rep ID: 26482)</p>
<p>Main issue 4: Bloor Homes are promoting land at Humber Doucy Lane, Rushmere St Andrew, (see Site Location Plan Appendix A). Land is situated within both the Ipswich Borough and East Suffolk District. Approximately 115 hectares in size. It presents both a shorter-term opportunity for a smaller scheme and a medium-long term opportunity for a larger scale Garden Village development. Development Framework Plans are included (Appendix B).</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26577)</p>
<p>Main issue 5: Not justified. Plan needs to be rewritten to justify sites with criteria-based policies which deal with the mitigation of development impacts.</p>	<p>Ravenswood Environmental Group (Rep ID: 26332)</p>
<p>Main issue 6: It is not clear whether the site sheets are or are not part of the plan.</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>
<p>Main issue 7: Site IP150 e is adjacent to other sites such as IP150c and IP150e and IP150d. These are geographically related, but they are separate in the plan. There is no justification for this piecemeal approach.</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>
<p>Main issue 8: The plan highlights serious traffic, air-quality, ecology, amenity and</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>

Main Issue	Representations
heritage constraints but does nothing to resolve these and does not insist upon master planning and effective mitigation. It is unacceptable to propose development only with a list of issues whilst not inviting or suggesting how these would be resolved	
Main issue 9: Support principle of allocating sites but need to allocate land to the North of Burrell Road as a residential allocation.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26652)
Main issue 10: Table 1 should refer to early years provision at sites IP048a Mint Quarter and IP037 Island Site.	Suffolk County Council (Rep ID: 26600)
Main issue 11: Site IP048a (Mint Quarter) The specification of the retention of the locally listed façade is too specific for a site allocation policy and the requirement for a development brief is unnecessary. The school component of allocation IP048a should be a separate allocation for a Primary School only.	Department for Education (Rep ID: 26550)

Policy SP3 – Land with Planning Permission or Awaiting a Section 106

Main Issue	Representations
Main issue 1: Support identification of IP206 and IP211 within Policy SP3, however, believe that the capacity figures are conservative and should be increased by up to 50%, with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).	Cardinal Lofts (Mill) Ltd) (Rep ID: 26568)
Main issue 2: SP2 sites are undeliverable and therefore land should be identified in neighbouring areas.	Gladman Homes (Rep ID: 26419)

Policy SP4 – Opportunity Sites

Main Issue	Representations
Main issue 1: SP4 Opportunity Sites are not deliverable or viable and therefore land should be identified in neighbouring districts.	Gladman Homes (Rep ID: 26423)

Policy SP5 – Land Allocated for Employment Use

Main Issue	Representations
<p>Main issue 1: Recommend reducing land allocation to reflect actual need. Land allocated in Table 3 (28.34ha) is significantly in excess of calculated requirement from Evidence Base (23.2ha). Such over provision can only be justified where there are clear reasons for a land supply buffer. No such evidence has been presented in the Plan or Evidence Base. Of the land allocated in Table 3, circa 24ha has been identified as being suitable for industrial uses -significant excess of the 9ha need calculated by the Employment Land Needs Assessment.</p>	<p>AquiGen (Rep ID: 26437)</p>
<p>Main issue 2: The Ravenswood employment sites should be planned so as to mitigate traffic impacts and be master planned with residential development. The whole area should be master planned so that environmental impacts are considered.</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>
<p>Main issue 3: The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Master planning and EIA must be insisted upon</p>	<p>Ravenswood Environmental Group (Rep ID: 26339)</p>

Policy SP6 – Land Allocated and Protected as Open Space

Main Issue	Representations
<p>Main issue 1: Object to the requirement that the Island Site provides 15% open space which is more than the minimum amount of on-site public open space provision required through Core Strategy Review Policy DM6. Request removal of reference.</p>	<p>Associated British Ports (Rep ID: 26483)</p>

Policy SP7 – Land Allocated for Leisure Uses or Community Facilities

Main Issue	Representations
<p>Main issue 1: IP150b - Floodlighting has the potential to harm the AONB. The AONB is not identified as a constraint. The need to</p>	<p>AONB Unit (Rep ID: 26285)</p>

Main Issue	Representations
assess impact on the AONB needs to be identified.	
Main issue 2: Support Council’s position that the amount of land for leisure or community uses on the Island Site should be determined through master planning.	Associated British Ports (Rep ID: 26484)
Main issue 3: The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated. Delete IP150b sports park.	Ravenswood Environmental Group (Rep ID: 26335)
Main issue 4: Site IP129 BT Depot – support school allocation.	Department for Education (Rep ID: 26543)

Policy SP8 – Orwell Country Park Extension

No main issues.

Policy SP9 – Safeguarding Land for Transport Infrastructure

Main Issue	Representations
Main issue 1: Owner of site IP152 objects to Park and Ride use on this site.	JPL Properties LLP (Mr James Little) (Rep ID: 26191)
Main issue 2: Object to inclusion in IP037 allocation of need for “additional vehicular access to the Island Site to enable the site’s development” and request removal. Object to inclusion of wording: “development layout should not prejudice future provision of a Wet Dock Crossing”. Request appropriate amendment to Policy SP9 and/or Policies Map IP – One Area Inset concerning the provision of a wet dock crossing.	Associated British Ports (Rep ID: 26486)

Chapter 5 – IP-One Area

Main Issue	Representations
Main issue 1: Generally supportive of the vision for the IP-One area.	Cardinal Lofts (Mill) Ltd (Rep ID: 26569)

Policy SP10 – Retail Site Allocations

No main issues.

Policy SP11 – The Waterfront

Main Issue	Representations
Main issue 1: Support Policy SP11 and welcome the recognition at para 5.21 of the need for new development to take account of the Port’s operational needs.	Associated British Ports (Rep ID: 26487)
Main issue 2: Fully supportive of Policy SP11	Cardinal Lofts (Mill) Ltd (Rep ID: 26570)

Main Issue	Representations
<p>Main issue 3: The Waterfront area needs to be extended westwards to cover land North of Burrell Road. The allocation of this site for residential development would achieve the aims of this policy.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26652)</p>
<p>Main issue 4: Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.</p>	<p>Historic England (Rep ID: 26663)</p>

Policy SP12 – Education Quarter

Main Issue	Representations
<p>Main issue 1: Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.</p>	<p>Historic England (Rep ID: 26664)</p>

Policy SP13 – Portman Quarter (formerly Ipswich Village)

Main Issue	Representations
<p>Main issue 1: Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.</p>	<p>Historic England (Rep ID: 26665)</p>

Policy SP15 – Improving Pedestrian and Cycle Routes

Main Issue	Representations
<p>Main issue 1: No coherent walking or cycling route.</p>	<p>Andrea McDonald (Rep ID: 26203)</p>
<p>Main issue 2: The area around the roundabout near St Peters Church is especially problematic.</p>	<p>Andrea McDonald (Rep ID: 26203)</p>
<p>Main issue 3: The river towpath is divided from the waterfront by the gyratory and is in need of improvement.</p>	<p>Andrea McDonald (Rep ID: 26203)</p>
<p>Main issue 4: Cars should not be allowed to drive around the waterfront due to highway safety and to improve the river path.</p>	<p>Andrea McDonald (Rep ID: 26203)</p>
<p>Main issue 5: Supportive of this policy.</p>	<p>Theatres Trust (Rep ID: 26239)</p>

Main Issue	Representations
Main issue 6: Support aspiration for a safe cycle/pedestrian access across the lock gates at the entrance to the Wet Dock subject to viability and ensuring Port operations are not compromised. Support provision of new foot/cycle bridges across the New Cut subject to the provision of such bridges being supported by public funding.	Associated British Ports (Rep ID: 26488)
Main issue 7: Generally supportive of Policy SP15, however, still have serious concerns about the impact of the proposals set out in the policy upon the development of Site IP035.	Cardinal Lofts (Mill) Ltd) (Rep ID: 26571)

Policy SP16 – Transport Proposals in IP-One

Main Issue	Representations
Main issue 1: Object to inclusion of statement (para 5.42), “which as a minimum will require a road bridge from the west bank to the Island Site... to enable any significant development”, and request removal. Need for access will depend on development established through master planning.	Associated British Ports (Rep ID: 26489)

Policy SP17 – Town Centre Car Parking

Main Issue	Representations
Main issue 1: Town centre car parking is a significant contributor to carbon emissions and availability of parking is a disincentive to modal shift and more sustainable travel options. To comply with national zero carbon objectives, Draft needs to acknowledge car parking is material in the overarching objective of reducing carbon emissions. Make reference to national policy and the Ipswich Climate Emergency.	Councillor Oliver Holmes (Rep ID: 26639)
Main issue 2: Policy is based on flawed 2019 Parking Strategy. Until proper analysis, no multi-storey car parks site should be allocated.	Councillor Oliver Holmes (Rep ID: 26642)
Main issue 3: We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane.	Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)

Main Issue	Representations
Main issue 4: It is not clear if the Ipswich Parking Strategy has actually been approved by the IBC Executive.	Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)
Main issue 5: The parking strategy is based on substantially higher jobs (12,500) and housing (8,840) targets than set out in the CS. Therefore obsolete.	Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)
Main issue 6: Parking strategy needs to take account of Climate Emergency declaration.	Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)
Main issue 7: Justify forecasts used by WYG parking report, and how the spatial strategy for parking responds to the WYG finding that care is needed to ensure parking provision does not encourage car use.	Suffolk County Council (Rep ID: 26640)

10. Part C – IP-One Opportunity Areas

Opportunity Area A – Island Site

Main Issue	Representations
Main issue 1: Welcome statement that Opportunity Area descriptions, development principles and plans will act as concept plans to guide the development unless evidence indicates a better approach. Note statement that allocation policies of the DPD take precedence over Opportunity Area guidance and site sheets, however, there are discrepancies between these respective parts of the DPD which would benefit from clarification. Request changes to text under “Opportunity Area A – Island Site”.	Associated British Ports (Rep ID: 26490)

Opportunity Area B – Merchant Quarter

Main Issue	Representations
Main issue 1: Site IP054b should be extended north to cover the Cattlemarket Bus Station. This would enable the regeneration aims for this area to be met.	Ortona Properties Ltd (Suzanne Nugent) (Rep ID: 26242)
Main issue 2: Concerned that the Development Options plan, together with the Development Principles, are not sound in that they will render development unviable and frustrate proposals to bring sites forward.	Cardinal Lofts (Mill) Ltd (Rep ID: 26572)

Opportunity Area C – Mint Quarter

Main Issue	Representations
Main issue 1: Supportive of these plans and of enhanced linkages to the Regent Theatre.	Theatres Trust (Rep ID: 26237)
Main issue 2: The requirement to 'respect and enhance setting of Listed and historic buildings' does not wholly comply with the NPPF.	Department for Education (in connection with allocation IP048a) (Rep ID 26549)

Opportunity Area D – Education Quarter

No main issues.

Opportunity Area E – Westgate

Main Issue	Representations
Main issue 1: Encourage the principles to include engagement with the Trust given the potential for impact on New Wolsey Theatre. We otherwise consider this to meet the tests of soundness.	Theatres Trust (Rep ID: 26238)

Opportunity Area F – River and Princes Street Corridor

No main issues.

Opportunity Area G – Upper Orwell River and Canalside

No main issues.

Opportunity Area H – Holywells

Main Issue	Representations
Main issue 1: Concerned about impact of building a new block of apartments in close proximity and its impact on lives around it.	Lily Maksimovic (Rep ID: 26269)
Main issue 2: Parking is difficult around here.	Lily Maksimovic (Rep ID: 26269)
Main issue 3: Concerned about impact on amenity of nearby properties.	Lily Maksimovic (Rep ID: 26269)

11. Part D – Implementation, Targets, Monitoring and Review

No main issues.

12. Part E – Appendices

Appendix 1 – A Summary of the Tests of Soundness

No main issues.

Appendix 2 – A list of Policies Contained in this Document

No main issues.

Appendix 3 – Site Allocation Details

3A – Site Allocation Details

IP003 – Waste Tip and Employment Area north of Sir Alf Ramsey Way

No main issues.

IP004 – Bus Depot, Sir Alf Ramsey Way

No main issues.

IP009 – Victoria Nurseries, Westerfield Road

Main Issue	Representations
Main issue 1: Allocated since 1997 Local Plan remains undeveloped. More cautious approach to the likelihood of delivery required.	Ipswich School (Rep ID: 26597)

IP010a – Co-Op Depot, Felixstowe Road

Main Issue	Representations
Main issue 1: Support school expansion.	Department for Education (Rep ID: 26542)
Main issue 2: School expansion needs 0.8ha [not the 0.5ha allocated].	Suffolk County Council (Rep ID: 26595)

IP010b – Felixstowe Road

Main Issue	Representations
Main issue 1: Support the change of use from employment to residential.	Daniel Hudson (Rep ID: 26235)
Main issue 2: The existing businesses are noisy, pose a threat to highway safety and damage local roads.	Daniel Hudson (Rep ID: 26235)

IP011a – Lower Orwell Street former Gym and Trim (formerly Smart Street/ Foundation Street)

No main issues.

IP011b – Smart Street/ Foundation Street (South)

Main Issue	Representations
Main issue 1: The allocation is supported by the landowner.	Ortona Properties (Sally Nugent) (Rep ID: 26245)

IP011c – Smart Street/ Foundation Street (North)

Main Issue	Representations
Main issue 1: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26609)
Main issue 2: Allocated in 1997 Local Plan, has not to date come forward for development. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26599)

IP012 – Peter’s Ice Cream, Grimwade Street

Main Issue	Representations
Main issue 1: Allocated in 1997 Local Plan. Whilst parts of wider site have come forward, and signs of potential development have been apparent, it is noted that the site does not yet benefit from planning permission. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26602)

IP014 – Hope Church, Fore Hamlet

No main issues.

IP015 – West End Road Surface Car Park

No main issues.

IP029 – Land Opposite 674 – 734 Bramford Road

No main issues.

IP031a – Car Park, Burrell Road

No main issues.

IP031b – 22 Stoke Street

No main issues.

IP032 – King George V Field, Old Norwich Road

Main Issue	Representations
Main issue 1: The trustees of the King George V Field stated that the site would need to be redeveloped in its entirety. The partial re-development set out in the proposed allocation would not provide sufficient funds to properly develop a multi-purpose site.	King George V Field Trustees (David J Coe) (Rep ID: 26193)
Main issue 2: The text in relation to the requirements for a replacement facility should be more explicit and should reflect Sport England's policy in relation to replacement playing fields (see proposed change).	Sport England (Rep ID: 26283)

IP033 – Land at Bramford Road (Stocks Site)

No main issues.

IP035 – Key Street/ Star Lane/ Burtons (St Peter's Port)

Main Issue	Representations
Main issue 1: Believe site has potential for much greater capacity than indicated and that this increased capacity will be necessary to ensure that development is viable due to number of site constraints (archaeology, hydrology, listed buildings, land contamination, flooding, air quality, design restriction).	Cardinal Lofts (Mill) Ltd (Rep ID: 26566)
Main issue 2: Believe there needs to be explicit reference to future development of IP035 having to incorporate car parking, for both residential units to be accommodated thereon and for further residential units to be developed on IP206 and IP211.	Cardinal Lofts (Mill) Ltd (Rep ID: 26567)
Main issue 3: Allocated in 1997 Local Plan. Site lies between two busy roads as part of one-way network, which may form constraint. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26603)

IP037 – Island Site

Main Issue	Representations
Main issue 1: Support allocation for residential/residential mixed-use, however, believe that proposed housing density is too	Associated British Ports (Rep ID: 26565)

Main Issue	Representations
high and should be reduced to approx. 150 units. Disagree that additional access would be required to enable development. Object to requirement of 15% open space as this is over the minimum requirement.	
Main issue 2: Allocated in 1997 Local Plan under site refs: 5.1 and 5.2. The need for additional access arrangements is noted and may represent constraint. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26605)

IP039a – Land between Gower Street and Great Whip Street

No main issues.

IP040 – Former Civic Centre, Civic Drive (Westgate)

No main issues.

IP041 – Former Police Station, Civic Drive

No main issues.

IP043 – Commercial Buildings, Star Lane

No main issues.

IP047 – Land at Commercial Road

No main issues.

IP048a – Mint Quarter/ Cox Lane East Regeneration Area

Main Issue	Representations
Main issue 1: residential use of upper floors may not be compatible with the school.	Department for Education (Rep ID: 26547)
Main issue 2: the requirement to retain the façade is too restrictive.	Department for Education (Rep ID: 26547)
Main issue 3: the requirement for a development brief is unnecessary.	Department for Education (Rep ID: 26547)
Main issue 4: the school should be a separate allocation.	Department for Education (Rep ID: 26547)
Main issue 5: Site sheet should refer to early years provision.	Suffolk County Council (Rep ID: 26598)

IP048b – Mint Quarter/ Cox Lane West Regeneration Area

No main issues.

IP049 – No.8 Shed, Orwell Quay

No main issues.

IP051 – Old Cattle Market, Portman Road - South

No main issues.

IP054b – Land between Old Cattle Market and Star Lane

Main Issue	Representations
Main issue 1: Site boundary should be extended north to include the Cattlemarket Bus Station. This would ensure that the wider regeneration aims of Opportunity Area B are met.	Ortona Properties (Sally Nugent) (Rep ID: 26241)
Main issue 2: Site allocation should be more flexible, allowing both commercial and residential development as per the adopted the local plan. Residential allocation alone is too restrictive. There should be the possibility for commercial units to remain and expand as required.	Norman Agran (Rep ID: 26319)
Main issue 3: Allocated in 1997 Local Plan as part of site refs: 5.9 and 5.10. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26606)

IP061 – Former School Site, Lavenham Road

Main Issue	Representations
Object.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169) Gary Butcher (Rep ID: 26198)
Main issue 1: Harm to the character of the area from infilling the green open space.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)
Main issue 2: Harm to the setting of the Grade II Listed Crane Manor.	Stewart McCarthy (Rep ID: 26168)
Main issue 3: The green space is used by the local community for a variety of activities and the loss of this space is negative for mental health and wellbeing.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169) Gary Butcher (Rep ID: 26198)
Main issue 4: Loss of view	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)
Main issue 5: Harm to neighbouring properties in terms of noise disturbance, light pollution, loss of light, loss of privacy, overshadowing and construction-related activities.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)
Main issue 6: Anti-social behaviour related to the development.	Stewart McCarthy (Rep ID: 26168)
Main issue 7: Increased traffic congestion, parking issues and emergency access issues arising from new development.	Stewart McCarthy (Rep ID: 26168) Gary Butcher (Rep ID: 26198)
Main issue 8: Inadequate local infrastructure to service the proposed development.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)

Main Issue	Representations
Main issue 9: residents weren't consulted on the planning application on part of the site.	Claire Sawyer (Rep ID: 26169)
Main issue 10: Harm to local wildlife and presence of bats not picked up in Wildlife Audit.	Gary Butcher (Rep ID: 26198)

IP064a – Land between Holywells Road and Holywells Park

No main issues.

IP066 – JJ Wilson, White Elm Street

No main issues.

IP067a & b – Former British Energy Site, Cliff Quay

No main issues.

IP080 – 240 Wherstead Road

No main issues.

IP083 – Banks of River upriver from Princes Street

No main issues.

IP089 – Waterworks Street

Main Issue	Representations
Main issue 1: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26618)

IP094 – Land to rear of Grafton House

No main issues.

IP096 – Car Park, Handford Road East

No main issues.

IP098 – Transco south of Patteson Road

Main Issue	Representations
Main issue 1: Concerned about impact of building a new block of apartments in close proximity and its impact on lives around it.	Lily Maksimovic (Rep ID: 26270)
Main issue 2: Parking is difficult around here.	Lily Maksimovic (Rep ID: 26270)
Main issue 3: Concerned about impact on amenity of nearby properties.	Lily Maksimovic (Rep ID: 26270)

IP105 – Depot, Beaconsfield Road

No main issues.

IP119 – Land east of West End Road

No main issues.

IP120b – Land west of West End Road

No main issues.

IP125 – Corner of Hawke Road and Holbrook Road

No main issues.

IP132 – Former St Peter’s Warehouse, 4 Bridge Street

Main Issue	Representations
Main issue 1: Allocated in 1997 Local Plan as part of site ref: 5.3. Lengthy vacancy with no signs of coming forward, despite allocation since 1997. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26607)

IP133 – South of Felaw Street

No main issues.

IP135 – 112 – 116 Bramford Road

No main issues.

IP136 – Silo, College Street

Main Issue	Representations
Main issue 1: Fire damaged buildings and lengthy vacancy with no signs of coming forward, despite allocation since 1997. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26608)

IP140 – Land north of Whitton Lane

No main issues.

IP141a – Land at Futura Park, Nacton Road (formerly the Cranes Site)

Main Issue	Representations
Main issue 1: The site is close to the AONB and the need for an assessment of the impact on the AONB should be reflected in the policy text.	AONB Unit (Rep ID: 26259)

Main Issue	Representations
Main issue 2: Suggest, site allocation could be considered for removal. No interest in Site 1 despite extensive marketing and designation within New Anglia Enterprise Zone. Site 1 shouldn't be restricted to Class B uses - subject to different townscape character due to relationship with Ravenswood and Nacton Road. Developing plans for site 3 meet B Class demands. If allocation not removed, suggest changes to constraints/issues text to ensure plan allows schemes to be justified on their own merits and to provide flexibility to support the delivery of site 1.	AquiGen (Rep ID: 26433)

IP149 – Pond Hall Farm

Main Issue	Representations
Main issue 1: Allocation is supported.	AONB Unit (Rep ID: 26268)

IP150b – Land south of Ravenswood

Main Issue	Representations
Main issue 1: Access to the Sports Park will need to be specified as it is not clear	Ravenswood Residents Association (Rep ID: 26176)
Main issue 2: Floodlighting has the potential to harm the AONB. The AONB is not identified as a constraint. The need to assess impact on the AONB needs to be identified.	AONB Unit (Rep ID: 26267)
Main issue 3: The split between private and social housing needs to be in line with the rest of the estate. We do not want a repeat or the UVW situation where the land was earmarked 100% social.	Claire Talbot (Rep ID: 26465)
Main issue 4: Traffic issues need to be considered, traffic already backs up daily at the McDonald's roundabout before additional housing. So would there be another entrance/exit?	Claire Talbot (Rep ID: 26465)
Main issue 5: Concerns over disruption to and loss of wildlife.	Claire Talbot (Rep ID: 26465)
Main issue 6: Instead of a skate park, an extension of the country park would give a space for recreation as well as maintaining wildlife.	Claire Talbot (Rep ID: 26465)
Main issue 7: The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated. Delete IP150b sports park.	Ravenswood Environmental Group (Rep ID: 26636)

IP150c – Land south of Ravenswood

Main Issue	Representations
Main issue 1: Object to the proposed allocation.	Ravenswood Residents Association (Rep ID: 26174)
Main issue 2: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this.	Ravenswood Residents Association (Rep ID: 26174)
Main issue 3: Is the access to this site via allocation IP150e? If so, it will need to be master planned.	Ravenswood Residents Association (Rep ID: 26174)
Main issue 4: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26174)
Main issue 5: The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Master planning and EIA must be insisted upon.	Ravenswood Environmental Group (Rep ID: 26630)

IP150d – Land south of Ravenswood

Main Issue	Representations
Main issue 1: Object to the proposed allocation.	Chris Warhurst (Rep ID: 26164) Ravenswood Residents Association (Rep ID: 26172) Hallowtree Scout Activity Centre (Rep ID: 26185) Ravenswood Environmental Group (Rep ID: 26338)
Main issue 2: Protected species have been seen on the site	Chris Warhurst (Rep ID: 26164) Ravenswood Environmental Group (Rep ID: 26338)
Main issue 3: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this.	Chris Warhurst (Rep ID: 26164) Ravenswood Residents Association (Rep ID: 26172) Hallowtree Scout Activity Centre (Rep ID: 26185)
Main issue 4: Insufficient local services/ amenities capacity (doctors, dentists and school).	Chris Warhurst (Rep ID: 26164) Ravenswood Residents Association (Rep ID: 26172) Sally Wainman (Rep ID: 26179)

Main Issue	Representations
Main issue 5: Inadequate sewage and drainage capacity to cope with new development.	Chris Warhurst (Rep ID: 26164)
Main issue 6: A mix of private and affordable homes are needed.	Ravenswood Residents Association (Rep ID: 26172)
Main issue 7: Does “Highway Network” just refer to the Nacton road/ Thrasher Roundabout or does it cover all roads?	Ravenswood Residents Association (Rep ID: 26172)
Main issue 8: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26172)
Main issue 9: The AONB would be negatively affected by the additional vehicular traffic.	Hallowtree Scout Activity Centre (Rep ID: 26185)
Main issue 10: The land must be kept undisturbed to allow flora and fauna to develop	Hallowtree Scout Activity Centre (Rep ID: 26185) Ravenswood Environmental Group (Rep ID: 26338)
Main issue 11: Needs to be master planned with other sites as part of one mixed use criteria based policy.	Ravenswood Environmental Group (Rep ID: 26338)
Main issue 12: Proposed for 34 homes but its contrived and unjustified shape demonstrates that it cannot accommodate 34 homes as frontage development.	Ravenswood Environmental Group (Rep ID: 26338)
Main issue 10: Remainder of Ravenswood community has been built out, but several parcels remain undeveloped. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26610)

IP150e – Land south of Ravenswood

Main Issue	Representations
Main issue 1: Object to the proposed allocation.	Ravenswood Residents Association (Rep ID: 26171) Hillary Scott (Rep ID: 26182) Helen Abbott (Rep ID: 26183) Jacky Robson (Rep ID: 26184) Hallowtree Scout Activity Centre (Rep ID: 26185) Bashar Shatta (Rep ID: 26187) Mr Jonathan N/A (Rep ID: 26192) Cindy Lawes
Main issue 2: A mix of private and affordable homes are needed.	Ravenswood Residents Association (Rep ID: 26171) Mr Jonathan N/A (Rep ID: 26192)
Main issue 3: Insufficient traffic capacity to cope with existing traffic demands.	Ravenswood Residents Association (Rep ID: 26171)

Main Issue	Representations
Additional development would exacerbate this.	Hillary Scott (Rep ID: 26182) Helen Abbott (Rep ID: 26183) Jacky Robson (Rep ID: 26184) Hallowtree Scout Activity Centre (Rep ID: 26185) Bashar Shatta (Rep ID: 26187) Mr Jonathan N/A (Rep ID: 26192) Cindy Lawes (Rep ID: 26197)
Main issue 4: Insufficient local services/ amenities capacity (doctors, dentists and school).	Ravenswood Residents Association (Rep ID: 26171) Sally Wainman (Rep ID: 26180) Cindy Lawes (Rep ID: 26197)
Main issue 5: Does “Highway Network” just refer to the Nacton road/ Thrasher Roundabout or does it cover all roads?	Ravenswood Residents Association (Rep ID: 26171)
Main issue 6: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26171) Helen Abbott (Rep ID: 26183) Jacky Robson (Rep ID: 26184) Mr Jonathan N/A (Rep ID: 26192)
Main issue 6: New homes should be built in central Ipswich rather than on green land in the outskirts as this is bad for wildlife, climate change and traffic pollution/ congestion. The area is overpopulated already.	Ravenswood Residents Association (Rep ID: 26171)
Main issue 7: A park or a lake is more appropriate to enhance the area.	Ravenswood Residents Association (Rep ID: 26171)
Main issue 8: The AONB would be negatively affected by the additional vehicular traffic.	Hallowtree Scout Activity Centre (Rep ID: 26185)
Main issue 9: The land must be kept undisturbed to allow flora and fauna to develop	Hallowtree Scout Activity Centre (Rep ID: 26185)
Main issue 10: A second access road will not solve the traffic problems.	Cindy Lawes (Rep ID: 26197)
Main issue 11: Allocated in 1997 Local Plan, as part of site ref 6.1. Remainder of Ravenswood community has been built out but several parcels remain undeveloped. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26614)

IP152 – Airport Farm Kennels, north of the A14

Main Issue	Representations
Main issue 1: Object to allocation	Ravenswood Residents Association (Rep ID: 26175)
Main issue 2: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate	Ravenswood Residents Association (Rep ID: 26175)

Main Issue	Representations
this. The development poses access constraints which would need to be master planned with the adjacent IP150c and IP150e sites.	
Main issue 3: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26175)
Main issue 4: Owner of site IP152 objects to Park and Ride use on this site.	JPL Properties LLP (Mr James Little) (Rep ID: 26191)
Main issue 5: The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Master planning and EIA must be insisted upon.	Ravenswood Environmental Group (Rep ID: 26630)

IP172 – St Margaret’s Green

No main issues.

IP188 – Webster’s Saleyard Site, Dock Street

No main issues.

IP221 – The Flying Horse PH, 4 Waterford Road

No main issues.

IP279a, b(1) and b(2) – Former British Telecom Office, Bibb Way

No main issues.

IP307 – Prince of Wales Drive

Main Issue	Representations
Main issue 1: Representatives objected to the proposed residential allocation	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167) Lisa Magor (Rep ID: 26165)
Main issue 2: Concerns stated that the proposal would be too dense, an overdevelopment of the site and out of character with the surrounding area.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167)

Main Issue	Representations
Main issue 3: Concerns raised regarding the harm that development would cause to the amenity of neighbouring properties (loss of light/ overshadowing, visual enclosure/ overbearing, overlooking/ loss of privacy, noise and disturbance during redevelopment).	Rosemarie Cornish (Rep ID: 26162) Terry Forster (Rep ID: 26166)
Main Issue 4: Representatives objected on the grounds of insufficient car parking in the area, the loss of car parking already on the site and the impact of parking on the surrounding streets.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167)
Main issue 5: There are high volumes of traffic already present in area, exacerbated by Halifax School drop-off and pick-up times.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167)
Main issue 6: The shop is a valuable community asset and shouldn't be lost.	Rosemarie Cornish (Rep ID: 26162) Terry Forster (Rep ID: 26166)
Main issue 7: Loss of views out towards River Orwell.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163)
Main issue 8: Loss of green and harm to biodiversity/ protected species.	Rosemarie Cornish (Rep ID: 26162)
Main issue 9: Objects to proposed redevelopment at the allocated site due to pressures on parking along Chatsworth Crescent/Prince of Wales Drive, congestion along roads at school time and the scale of proposed residential buildings in relation to existing architecture.	Mr. Forster (Rep ID: 26296)

IP309 – Former Bridgeward Social Club, 68a Austin Street

Main Issue	Representations
Main issue 1: Support allocation as a suitable site for residential development, well located with accessible transport links and close to local amenities. Intention to redevelop site with high quality scheme including affordable housing. Keen to work with IBC to develop appropriate approach in order to maximise development whilst respecting local environment.	Austin Street Projects Ltd (Rep ID: 26344)

IP347 – Mecca Bingo

No main issues.

IP348 – Upper Princes Street

No main issues.

IP354 – 72 (Old Boatyard) Cullingham Road

Main Issue	Representations
Main issue 1: Existing parking pressures and access concerns on Cullingham Road due to lack of existing off-road parking, new housing would add additional parking problems as new residents likely to have two vehicles.	Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26235) Tim Leggett (Rep ID: 26258) Margaret Pearson (Rep ID: 26273)
Main issue 2: Concern about traffic pollution from construction vehicles.	Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26234) Tim Leggett (Rep ID: 26258) Margaret Pearson (Rep ID: 26273)
Main issue 3: Concern was raised that the change of use would cause noise and disruption at evenings and weekends in a quiet location.	Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26234) Margaret Pearson (Rep ID: 26273)
Main issue 4: Concern over loss of wildlife habitat, need to be encouraging wildlife. Great crested newts.	Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26234) Tim Leggett (Rep ID: 26258) Margaret Pearson (Rep ID: 26273)
Main issue 5: Overlooking/ loss of privacy concerns	Stephen Morgan (Rep ID: 26234) Margaret Pearson (Rep ID: 26273)
Main issue 6: Flood Risk	Tim Leggett (Rep ID: 26258)
Main issue 7: Piling/ damage to properties during construction.	Tim Leggett (Rep ID: 26258)
Main issue 8: No play area and large gardens needed for children to play.	Tim Leggett (Rep ID: 26258)
Main issue 9: May be a housing association development which is not in keeping with the ownership makeup of street.	Tim Leggett (Rep ID: 26258)
Main issue 10: Drainage/ sewage capacity concerns.	Margaret Pearson (Rep ID: 26273)
Main issue 11: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26612)

IP355 – 77 – 79 Cullingham Road

Main Issue	Representations
Main issue 1: Support principle of allocation.	Universal Property Services Ltd (Rep ID: 26325)
Main issue 2: Positive re-use of a brownfield site, within a predominantly residential area.	Universal Property Services Ltd (Rep ID: 26325)
Main issue 3: The site will allow for a comprehensive and controlled re-development of the area including geographically linked sites IP279a, b(1) and b(2) – Former British Telecom Office, Bibb Way and IP003 Waste Tip at Sir Alf	Universal Property Services Ltd (Rep ID: 26325)

Main Issue	Representations
Ramsey Way all within close proximity to IP355.	
Main issue 4: The site will allow for cycle path aspirations linking the site to Bibb Way.	Universal Property Services Ltd (Rep ID: 26325)
Main issue 5: 10m EA River corridor buffer zone will remove 50% of the site & render the site nonviable	Universal Property Services Ltd (Rep ID: 26325)
Main issue 6: Higher density will need to be considered to ensure viability and linked aspirations.	Universal Property Services Ltd (Rep ID: 26325)
Main issue 7: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26615)

ISPA4.1 – Northern End of Humber Doucy Lane

Main Issue	Representations
Main issue 1: Site should remain as farmland to provide the green trail (as per Policy DM10).	Derk Noske (Rep ID: 26194)
Main issue 2: Additional housing would encroach on this pristine countryside that provides easy access to green spaces.	Derk Noske (Rep ID: 26194)
Main issue 3: Allocation will significantly increase traffic and development should not take place until significant improvements to roads/ travel have been made.	Rushmere St Andrew Parish Council (Rep ID: 26233)
Main issue 4: The Rugby Football Club has a need to expand its facilities/ pitches to meet local demand. The potential sale of the existing land could realise the funding to assist the club to meet these demands either through an expansion adjacent to the existing site or a alternative new site. Site IP184b should be included within the ISPA4.1 allocation.	Ipswich Rugby Football Club (Rep ID: 26246)
Main issue 5: Development must preserve and where possible enhance nearby heritage assets and their settings where this setting contributes to significance. Heritage Impact Assessment required. Any specific measures required to remove/ mitigate any harm should be included in a site-specific policy for ISPA4.1.	Historic England (Rep ID: 26659)
Main issue 6: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26616)
Main issue 7: Development of ISPA 4.1 is unsustainable. Concerns include traffic, school capacity, loss of habitat, air pollution and drainage infrastructure.	Jo Porter (Rep ID: 26432)
Main issue 8: Object to allocation of land at the northern end of Humber Doucy Lane	Ipswich School (Rep ID: 26635)

Main Issue	Representations
(ISPA4.1), with suggested alternative allocation of land west of Tuddenham Road, north of Millenium Cemetery (capacity for 500 dwellings).	

3B – Development Constraints for Sites Identified through Policy SP3 where construction is not already underway

No main issues.

IP005 – Former Tooks Bakery, Old Norwich Road

No main issues.

IP042 – Land between Cliff Quay and Landseer Road

No main issues.

IP048c – 6-10 Cox Lane and 36-46 Carr Street (upper floors)

No main issues.

IP054a – 30 Lower Brook Street

No main issues.

IP059a & b – Arclion House and Elton Park, Hadleigh Road

No main issues.

IP074 – Land at Upper Orwell Street

No main issues.

IP088 – 79 Cauldwell Hall Road

No main issues.

IP106 – 391 Bramford Road

No main issues.

IP116 – St Clement’s Hospital Grounds

No main issues.

IP131 – Milton Street

No main issues.

IP142 – Land at Duke Street

No main issues.

IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)

Main Issue	Representations
Main issue 1: Object to the proposed allocation.	Ravenswood Residents Association (Rep ID: 26173) Ravenswood Environmental Group (Rep ID: 26334)
Main issue 2: A mix of private and affordable homes are needed.	Ravenswood Residents Association (Rep ID: 26173) Ravenswood Environmental Group (Rep ID: 26334)
Main issue 3: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this.	Ravenswood Residents Association (Rep ID: 26173)
Main issue 4: Insufficient local services/ amenities capacity (doctors, dentists and school).	Ravenswood Residents Association (Rep ID: 26173)
Main issue 5: Does “Highway Network” just refer to the Nacton road/ Thrasher Roundabout or does it cover all roads?	Ravenswood Residents Association (Rep ID: 26173)
Main issue 6: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26173)
Main issue 7: The site is incorrectly titled S & T but should be U, V and W.	Ravenswood Environmental Group (Rep ID: 26334)
Main issue 8: The historic permission is no longer extant.	Ravenswood Environmental Group (Rep ID: 26334)

IP161 – 2 Park Road

No main issues.

IP165 – Eastway Business Park, Europa Way

No main issues.

IP169 – 23-25 Burrell Road

No main issues.

IP200 – Griffin Wharf, Bath Street

No main issues.

IP205 – Burton’s, College Street

No main issues.

IP206 – Cranfields, College Street

Main Issue	Representations
Main issue 1: Support identification of IP206 within Policy SP3, however, believe that the capacity figures are conservative and should be increased by up to 50%, with	Cardinal Lofts (Mill) Ltd) (Rep ID: 26578)

Main Issue	Representations
specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).	

IP211 – Regatta Quay

Main Issue	Representations
Main issue 1: Support identification of IP211 within Policy SP3, however, believe that the capacity figures are conservative and should be increased by up to 50%, with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).	Cardinal Lofts (Mill) Ltd) (Rep ID: 26580)

IP214 – 300 Old Foundry Road

No main issues.

IP245 – 12-12a Arcade Street

No main issues.

IP256 – Artificial Hockey pitch, Ipswich Sports Club

No main issues.

IP279a – Former British Telecom, Bibb Way

Main Issue	Representations
Main issue 1: Whilst no objection to conversion of BT building into residential units, concerns raised over impact on local wildlife. Concerns also raised over whether development would include areas of nature reserve/canal adjacent to the building.	Philip Charles (Rep ID: 26349)

IP283 – 25 Grimwade Street

No main issues.

Appendix 4 – Opportunity Areas

IP028b – Jewsons, Greyfriars Road

Main Issue	Representations
Main issue 1: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26604)

IP045 – Land Bounded by Cliff Road, Toller Road and Holywells Road

No main issues.

IP052 – Land between Lower Orwell Street and Star Lane

No main issues.

IP226 – Helena Road/ Patteson Road

Main Issue	Representations
Main issue 1: Concerned about impact of building a new block of apartments in close proximity as area already well built up.	Lily Maksimovic (Rep ID: 26271)
Main issue 2: Parking is difficult around here.	Lily Maksimovic (Rep ID: 26271)
Main issue 3: Concerned about impact on amenity of nearby properties.	Lily Maksimovic (Rep ID: 26271)

13. Sustainability Appraisal/ Strategic Environmental Assessment

Main Issue	Representations
Main issue 1: The methodology and baseline information meet the requirements of the SEA Directive and associated guidance. The final SA contains a robust assessment of the environmental effects of plan policies and allocations on statutorily designated sites and landscapes and has taken into account advice and the findings of the HRA.	Natural England (Francesca Shapland) (Rep ID: 26288)
Main issue 2: Appears that environmental, social and economic effects of plan(s) are inadequately/ inaccurately assessed against HRA and the SA. The SEA Directive requires that assessment include identification of cumulative and synergistic effects, including other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.	Save Our Country Spaces (Rep ID: 26341)
Main issue 3: Highly material is the decision/ judgement released from The Supreme Court on Climate Change and development- (Heathrow) ¹ . This needs referencing and being taken into account within Local Plans as it is a ‘fundamental game changer’ with respect to Local Plans, Strategic Planning and Local Development Control and Planning Committee decision making. This new case law could make Local Plans, where Paris Agreement on climate change, (concluded in December	Save Our Country Spaces (Rep ID: 26345)

Main Issue	Representations
<p>2015 and ratified by the United Kingdom in November 2016) isn't adequately taken into account or doesn't demonstrate conformity to within Strategic Environmental Assessment challengeable and potentially unlawful.</p>	
<p>Main issue 4: SA simply assumes that CS fully implemented and full funding for all measures secured. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. SA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.</p>	<p>Save Our Country Spaces (Rep ID: 26373) Northern Fringe Protection Group (Rep ID: 26501 & 26504)</p>
<p>Main issue 5: The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan10 (paragraph 12.209). The SA fails to assess this and is unsound.</p>	<p>Save Our Country Spaces (Rep ID: 26377)</p>
<p>Main issue 6: The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.</p>	<p>Save Our Country Spaces (Rep ID: 26378) Northern Fringe Protection Group (Rep ID: 26505)</p>
<p>Main issue 7: No SA of: - Lack of sewage infrastructure for IGS and ISPA and environmental impacts of new sewage infrastructure (emissions and traffic congestion) - air quality or noise assessment in relation to rail transport most (Ipswich Chord and Freight yard) and additional freight to/ from Port of Felixstowe, - environmental impacts of Port of Ipswich.</p>	<p>Save Our Country Spaces (Rep ID: 26485)</p>

Main Issue	Representations
<ul style="list-style-type: none"> - potential impacts of increased freight traffic on IGS pedestrian bridge and Westerfield rail crossing -decision to destroy Green Rim by building homes on ISPA4 and re-designating as Green Trails. - lack of full appraisal of the impacts on building ISPA4. - omission Climate Emergency Declaration 	
<p>Main issue 8: Appendix F sets out our full concerns. In summary, the SA has not considered the spatial strategy actually set out in the Local Plan. An option has been assessed which the Council consider to be close to the spatial strategy chosen, but they are different. It appears that Spatial Option 1, the option most closely aligned with the spatial strategy in the Local Plan, has been scored unjustly positively in some areas, and Spatial Option 2 has been scored more poorly. The SA prepared alongside the emerging Local Plan does not provide the necessary justification of the proposed spatial strategy. SA needs updating to address these concerns.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26591)</p>

14. Habitat Regulations Assessment

Main Issue	Representations
<p>Main issue 1: The HRA provides a robust assessment of the Ipswich Local Plan final draft in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). Recommendations for strengthening the policy wording of the HRA have been incorporated within the final draft of the Core Strategy and carried forward into the Appropriate Assessment stage.</p>	<p>Natural England (Francesca Shapland) (Rep ID: 26287)</p>
<p>Main issue 2: Heathrow decision highly material. Needs referencing and assessment regarding Local Plans, Strategic Planning and Local decision making. New case law could make Local Plans, where Paris Agreement on climate change isn't adequately taken into account or doesn't demonstrate conformity to within HRA challengeable and potentially unlawful.</p>	<p>Save Our Country Spaces (Rep ID: 26346)</p>
<p>Main issue 3: Fails to take into account non-compliance of the AQAP with</p>	<p>Save Our Country Spaces (Rep ID: 26346)</p>

Main Issue	Representations
Government guidelines, non-compliance of the AQA for the IGS with DM3 and train and shipping emissions, especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site.	Northern Fringe Protection Group (Rep ID: 26503)
Main issue 4: HRA simply assumes that CS fully implemented and full funding for all measures secured. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. HRA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.	Save Our Country Spaces (Rep ID: 26376) Northern Fringe Protection Group (Rep ID: 26503)
Main issue 5: HRA incomplete and must address impacts of: 1. Proposed re-designation of Green Rim. 2. New sewage infrastructure required for growth. 3. Required traffic infrastructure identified by traffic modelling 4. Non-compliance of IGS AQA with DM3. 5. Emissions from rail and shipping. If no such assessments are included in the HRA then needs to explain why. IBC's response to the recommendations in relation to Paragraph 1.29 is not acceptable. CS needs strengthening to ensure compliance with this recommendation especially given Green Rim redesignation. Also whether lack of S106 payments for RAMs IGS sites acceptable.	Save Our Country Spaces (Rep ID: 26491) Northern Fringe Protection Group (Rep ID: 26539)

15. Health Impact Assessment

Main Issue	Representations
Main issue 1: Assumes that CS fully implemented and full funding for all measures. No evidence delivery of improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift.	Save Our Country Spaces (Rep ID: 26374) Northern Fringe Protection Group (Rep ID: 26502)

Main Issue	Representations
<p>IBC and SCC’s record regarding this is dire. HIA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, climate change declaration, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.</p>	

16. Local Plan Policies Map

Main Issue	Representations
<p>Main issue 1: The key is out of date. County Geological Sites and Regionally Important Geological Sites are all called "County Geological Sites" now. The five locations of the sites are correct, only the key is wrong.</p>	<p>GeoSuffolk (Caroline Markham) (Rep ID: 26243)</p>
<p>Main issue 2: With regard to land use designations within the IGS, there is a lack of clarity/consistency to terminology, and in any event there is no need for specific land use allocations within the overall IGS, or justification for the specific areas shown. Removal of land use allocations within the overall IGS allocation, or at least adjustment to the key/text to make clear that all are indicative.</p>	<p>Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26305)</p>
<p>Main issue 3: Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as “Land Allocated for Sport Use” as it is not required for this purpose. It is proposed the site is allocated for 500 dwellings.</p>	<p>Ipswich School (Rep ID: 26638)</p>

17. IP-One Policies Map

Main Issue	Representations
<p>Main issue 1: Object to inclusion on the IP – One Inset Map of a route for the Wet Dock Crossing. Whilst supportive of intention to continue to make a case for Wet Dock Crossing, given there is no formal commitment to this it is not appropriate for Policies Map IP – One Area Inset to define an alignment of a potential route for a Wet Dock Crossing and for SP9 to effectively safeguard this. Request amendments.</p>	<p>Associated British Ports (Rep ID: 26492)</p>

Main Issue	Representations
<p>Main issue 2: Regarding the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map IP-One Area inset map and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas. However, these areas do not match up with illustrative boundaries in The Ipswich Key Diagram. The opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.</p>	<p>Historic England (Rep ID: 26662)</p>

Appendix A – Analysis of Responses to the Issues and Options (2017) Consultation

1. Main issues from consultations

The main issues raised during consultation are summarised below. There were submissions made in response to 102 of the 106 questions presented to stimulate responses. No new issues were raised beyond those anticipated by the questions. While there were a significant number of individual issues raised by respondents who were seeking specific individual outcomes, the responses were helpful in confirming that there were no significant omissions from the Council's adopted Local Plan content. While this may have been expected – with an up to date plan having been adopted in February 2017 – this remains an important conclusion confirmed by the process.

Some of the broader governance matters expressed, such as support for Local Government reorganisation and boundary extensions for the borough administrative area, are not planning matters that can be covered by the Local Plan. The main issues raised are summarised below and have been grouped together based on themes that have been identified following the scrutiny of individual submissions.

A very brief summary of the representations is attached at Appendix G of the Issues and options Consultation Statement, offering a simple record of the replies to individual questions. It should be read alongside the full issues and options stage representations which are available to view in full via the Council Local Plan web pages. A full schedule of representation summaries and the Council's responses is available for information alongside the Preferred Options consultation documents. The schedule of representations indicates the nature of the submission and the Council's view regarding the need for change.

Environment and protections

The submissions varied between the wish to protect interests of importance including heritage assets, wildlife sites such as RAMSAR and countryside generally to broader comments concerning the need to develop new facilities (e.g. allotments) to avoid the disruption of those already existing. Policies DM5 and DM7 cover these aspects.

A recurring theme was the need to promote the town's heritage assets and local character as a catalyst for strengthening the sense of place. Policies DM12 and 13 already apply.

Wildlife and green corridors were considered not only important as habitat for the free movement of wildlife but also as corridors for walking, cycling and an increased sense of resident's and visitor's wellbeing. It was suggested that the existing network be extended among any possible sites around and on the edge of town which may be developed during the plan period. A number of responders suggested extending this "green rim" into neighbouring districts. As a response, the Council has sought to clarify the purpose of the DM policies applying to Green Corridors, Open Space and Recreation and the Natural Environment to establish the important links between them. These are confirmed in the terms of strategic policy CS16 that seeks "Green Infrastructure" including the Green Rim around the town.

Comments relating to tall buildings were not favourable. The majority of responders considered that tall buildings were not appropriate in the town, even at the Waterfront. This gives rise to a possible tension for the plan as the NPPF maintains a commitment to appropriate densities within urban areas and higher central area density will often be achieved through the incorporation of high-rise development. In the context of meeting the housing need of the Borough, (within the Borough administrative area) tall buildings are likely to play a key part in the delivery of the new homes in appropriate locations. The NPPF expectation needs to be reflected in the Council's policy and so Policy DM15 for tall buildings has been reviewed and altered to reflect the submissions concerning local character and the need to integrate these buildings with their surroundings.

Scale of growth and allocating land – housing development

The reduced growth Scenario A received the larger number of submissions (6) with environmental protection as the central concern. Middle growth scenario B received the support of the Home Builders Federation suggesting that Scenario B was “a positive approach” but a minimum preferring further consideration of the higher growth rate scenario C that could be introduced with support for smaller site in the first ten years. Other developers supported the higher growth scenario while the Environment Agency and NHS/CCG comments on system capacity were noted. The responses generated by the low, medium, high development scenarios has indicated the range of views. However, the debate now has been given a tighter context by the National Planning Policy Framework that expects the Council to use a standard method to quantify local housing need. The Council’s response is now set out in Policy CS7 and its preamble.

Affordable Housing issues were generally accepted by the development sector but they were concerned to point out that each site would have to prove its own viability. A simplified percentage could not be applied to the whole quantum of new homes throughout the plan period and across the borough. There will be some further analysis required concerning this important issue such as the Whole Plan Viability Assessment.

There was strong opposition to the reallocation of existing open space sites to housing from responders. This opposition was universal, despite identified local housing need. A representation was received that the Local plan has yet to allocate additional permanent pitches for Gypsies and Travellers. However, the Council is cooperating in a Suffolk wide delivery approach to address the allocation of pitches. The Council has also responded with amendments to policy CS11 to reflect comments received on the criteria used to determine applications for new sites.

Scale of growth and allocating land – industrial and commercial development

Associated British Ports (ABP) expressed concern that new development around the Waterfront could prejudice existing uses and activities at the Port site. The Port is a key employer across the Town and officers should consider strengthening policies which protect its operations. The importance of the Port is already acknowledged for example through explanatory text to policy DM32 The Protection of Employment Land.

The need to avoid the delivery of too much employment land was the subject of a submission which pointed out that the greater number of employment opportunities lay outside of the borough and that this should not be allowed to prevent residential allocations from being put forward. The Preferred options draft plan proposes to re-allocate employment sites to residential use, for example at Holywells Road (see policy SP2). It also reduces the employment land allocations through policy SP5.

A clear business and growth agenda was sought in several submissions for enhanced coordination of Council activity with the New Anglia LEP, Felixstowe Port interests and the Haven Gateway Partnership. Further links with the County Council and a Business

/ Academic group were proposed. Several responses called for all parties to lobby for a Greater Ipswich Orbital (Northern Bypass) in the next government spending round as a matter of priority. Links to the LEP's Economic Strategy for Norfolk and Suffolk are made throughout the documents.

Transport

Several submissions called for infrastructure improvements including transport measures for the improvement of congestion and air quality. There was no clear direction from the responses to Q8 which asked if new or enhanced infrastructure was an acceptable return or incentive for accepting development. However, delivery of infrastructure in advance of development was generally found more acceptable.

Several comments concerning the need for the Northern Distributor Road reflected support for early delivery due to congestion in the town and the effects of the Orwell Bridge closure on the town. An "ambitious project" to reduce traffic in the town and encourage pedestrian connections between the Waterfront and the core of the town centre was requested.

The Northern Route was further supported, but as an important part of a balanced transport approach alongside initiatives for other than the car. The Council has responded by proposing changes to its adopted policies from 2017 with amendments to Policy CS20. This reflects submissions from NALEP (New Anglia LEP) and others for a balanced approach to transport and the prioritisation of pedestrians and cyclists within the Ipswich town centre. The Preferred Options Plan also now refers to strategic transport priorities through Policy ISPA2.

Other Transport related matters raised included the need for further pedestrian priority schemes including waterfront links to the town centre and improvements to the Star Lane Gyratory. There were calls also for improvements to the cycle network, with some specific areas identified such as routes in from the east of the Borough. The Preferred Options draft Local Plan retains reference to the need for integrated cycle routes and the Council has published a Cycling Strategy SPD.

Other submissions identify air quality as a major concern and this is noted as an ongoing issue. Transport modelling has been undertaken jointly with neighbouring local planning authorities in order to understand the cumulative impacts of Local Plan Review proposals. When this is finalised, air quality modelling will also be undertaken to enable any necessary mitigation to be identified. A new Air Quality Management Policy (DM3) has been formed from within other existing policies to create a freestanding policy in response to this issue.

Community developments

The need for community use buildings as part of redevelopment schemes or as a "planning gain" was identified and this possibly coincides with requests for opportunities for the arts found elsewhere in the submissions. Empty premises

attracting Anti-Social Behaviour, brown field sites that interrupt connections between parts of the town, and the need for employment opportunities were commented upon.

Suffolk Police have made detailed comments on the need for good liaison at the design stage of major developments. None of the submissions suggested any changes to the existing Policy DM23 for the Protection and Provision of Community Facilities and Policy DM27 (Arts Culture and Tourism) is retained from the adopted plan to support the retention and enhancement of existing facilities providing arts, cultural and tourism facilities, including visitor accommodation throughout the Borough. New facilities for arts, culture or tourism, including accommodation will also be supported - where they are focused within the town centre boundary or within the Waterfront area.

Town Centre

The challenges faced by town centres generally was noted and there were initiatives requested for improving the evening economy - provided that this did not detract from the town's ability to function as a regional shopping destination. Some degree of concern was expressed for personal safety in the town in the evenings when the town became quiet. An improved "experience" based on smaller/boutique shopping, music and arts and the reintroduction of homes into the town were suggested. Concern was expressed for the continuing pull of retailing to edge and out of town locations to the detriment of the wellbeing of the town centre.

The Council has revisited the suite of policies relating to the town centre and amended its approach and added new policies for Shopfront design (DM24) and Advertisements (DM25) to accord with the NPPF approach. An Evening and Night Time Economy policy (DM28) has been included to help with improving the town centre's sense of vitality and well-being in the evening. The Central Shopping Area policy (DM26) has been revised to retain a focus on A1 retail but add some flexibility within identified Primary, Secondary and Specialist Shopping Areas.

There were some requests for street improvements and tree planting. Historic England reminded the Council of the designated heritage assets that the town centre contains. These will be subject of on-going improvement work with projects emerging through the draft Public Realm Strategy Supplementary Planning Document.

Infrastructure

Submissions suggested that all areas need sufficient high-quality greenspace, with good connectivity to and through the network. Natural England have recognised the benefits of the Council sharing in the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and agree that the implementation of this strategy within Ipswich Borough and neighbouring districts will result in new residential development having no likely significant effect in combination on internationally designated sites. No new issues were raised for green infrastructure and Policy DM9 for the protection of trees and hedgerows and the policies mentioned above are retained.

The County Council has advanced the case for Libraries, Fire and Rescue, and replacement Waste facilities. These issues will be addressed via the Infrastructure Delivery Programme. The roll out of Superfast broadband has been supported by the Suffolk Chamber of Commerce and the Plan has been updated with a new policy DM33: Delivery and Expansion of Digital Communications Networks. Cycling infrastructure composed of both new routes and en-route facilities such as secure bike parking has been promoted by the submissions. This has now been addressed in a revised policy DM21 (Car and Cycle Parking) that works in tandem with a revised Policy DM20 on Transport and access in New Development.

Health facilities, rail upgrades and road improvements (including Copdock junction and the Northern Distributor Road) were seen to be integral needs to assist the accommodation of the anticipated development. The Wet Dock Crossing (or Upper Orwell Crossings Project) was supported in several submissions. This is currently under review by the Highway Authority, as noted in the explanatory text to policy CS20.

The Council has clarified its stance concerning Strategic Infrastructure delivery in the Ipswich Strategic Planning Area (ISPA) policy ISPA2 included in the Preferred Options document. In addition, Table 8A has been updated.

Other issues and conclusions

The review of the Issues has taken place in tandem with an internal consultation with Development Management officers and the publication of the 2018 National Planning Policy Framework. The amendments raised have resulted in the revisions proposed to the Policies adopted in 2017, which have sought to clarify policies for their meaning and to bring them into line with the 2018 NPPF.

The plan-making process has never been expected to provide a policy for every eventuality. Therefore, it is not necessary to make changes to deal with every matter raised at the issues and options stage. Whilst the local plan could be extended to include a statement or a policy on each of the elements suggested, there is a danger that it would become unwieldy and/or unnecessarily duplicate national policy. Nevertheless, the majority of the matters identified in the responses are, directly or indirectly, addressed by the terms of the plan and the main issues raised have been addressed as described above.

2. Conclusions

This report demonstrates that from 2017 to date the Council has followed an open and transparent process in the preparation and publication of its New Local Plan 2018 to 2036.

It has followed legislative requirements as well as good practice. It has also complied with its Statement of Community Involvement.

There has been on-going engagement with local residents and businesses, resulting in significant changes to policy where that is justified by the available evidence.

There has been active and constructive co-operation with nearby and neighbouring local planning authorities to ensure that cross-boundary strategic planning matters have been fully considered and, where possible and consistent with the Council's strategy and evidence, carried through to the plan. Compliance with the Duty to Co-operate is evidenced through a separate document and a draft Statement of Common Ground.

Interested bodies and organisations have also played a key role in refining appropriate policies to ensure that the Preferred Options Draft Local Plan Review represents a positive yet holistic approach to sustainable development.

Landowners and developers have also played an important role in highlighting potential sources of housing supply; where appropriate and in accordance with the Council's strategy, these have been carried forward in a positive way.

Appendix B – Analysis of Responses to Preferred Options (2019) Consultation

Core Strategy and Policies DPD Review

Representations (overall)	Comment	Object	Support
413	95	251	67

1. Chapter 1 – Introduction

Representations	Comment	Object	Support
4		3	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26005	Suffolk County Council	Diagram 1 refers to the Drainage and Flood Defence Policy. This has been superseded by the Suffolk Flood Risk Management Strategy which has been endorsed by the Ipswich Borough Council Executive.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25859	Save our Country Spaces	SOCS suggest the Final Draft Local Plan fails the tests of soundness as it is not positively prepared, not justified, not effective and not consistent with national policy. The Climate Change agenda (NPPF10) is insufficiently addressed and proposals are contrary to this. The HRA and SA have inadequately and inaccurately assessed the effects of the plan. Serious adverse effects, as required under NPPF 6 - 17, have not been properly identified. NPPF-11 has not been adequately taken into account.
26140	Stepping Stones Biodiversity Charity	Suggest the Final Draft Local Plan fails the tests of soundness as it is not positively prepared, not justified, not effective and not consistent with national policy. The Climate Change agenda (NPPF10) is

		<p>insufficiently addressed and proposals are contrary to this.</p> <p>The HRA and SA have inadequately and inaccurately assessed the effects of the plan. Serious adverse effects, as required under NPPF 6 - 17, have not been properly identified.</p> <p>NPPF-11 has not been adequately taken into account.</p>
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25554	Wood on behalf of National Grid	We have reviewed the above Ipswich Local Plan Review Preferred Options documents and can confirm that National Grid has no comments to make in response to this consultation.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The HRA and the SA are not each a single entity, rather they develop over the development periods of the emerging local plan. At each stage of plan making, the HRA and the SA are reviewed by our appointed consultants and we consider what is required to change in the light of the work. It has been picked up separately that there is insufficient information in the introduction chapter about the role and relationship of the SA and the HRA to plan-making and this is being revised for the Reg. 19 plan version. In terms of serious adverse effects, the SA and HRA conclude that at a plan level, the Local Plan will not result in adverse effects, subject to the incorporation of recommendations. The effects and recommendations will continue to be updated throughout the process including a final update following any modifications that may be proposed after examination.

The Adopted Local Plan was found sound in 2017 and the Local Plan Review process has not led to a root and branch change, but the opportunity has been taken to update content in the vision and objectives, the policies and supporting text and site allocations, in the light of: The National Planning Policy Framework July 2018; Joint work with neighbouring local planning authorities on joint or aligned local plan reviews, including the Statement of Common Ground (March 2019); The policies and proposals of organisations and partners, such as the Marine Management Organisation, the New

Anglia Local Enterprise Partnership and the Ipswich Vision Board; New evidence, for example from monitoring or research; Emerging case law; Issues arising from the experience of the Council’s Development Management Team interpreting and implementing policies; Submissions at the Issues and Options consultation stage; and The Council’s priorities responding to new challenges facing Ipswich. The Council considers that the Local Plan delivers on the stated objectives and is compliant with The National Planning Policy Framework, July 2018. The NPPF has since been updated on 19 February 2019 following a technical consultation to redefine deliverable housing. The February 2019 NPPF amendments have not been reflected in the Ipswich Local Plan Review Preferred Options, as the February 2019 NPPF update was published when the Preferred Options Local Plan was out for consultation but will be reflected in the Regulation 19 Local Plan.

The Council believes that the strategy and policies set out in the emerging Local Plan are in accordance with national planning policy, including adequately mitigating and responding to the challenges of climate change. The emerging Local Plan has also been prepared in accordance with the plan-making criteria set out in NPPF paragraph 11.

Diagram 1 has been amended to better portray the local context for the Ipswich Local Plan.

2. Chapter 2 – The Planning System

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

- Parish and Town Councils**
- Statutory Consultees**
- Other Organisations**
- Developers and Landowners**
- Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

Minor amendments to the terminology and updates to the latest legislation have been made. This is for clarity and to inform the general public of the statutory requirements of the local plan system.

3. Chapter 3 – The Local Enterprise Partnership

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No change recommended

4. Chapter 4 – The Duty to Co-operate

Representations	Comments	Object	Support
5	0	3	2

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26042	Sproughton Parish Council	The Parish notes that the Council (IBC) is working closely with Babergh/Mid Suffolk and Suffolk Coastal. The Parish Council considers it is important that you continue to work closely with them due to the fact that this village is only just outside of Ipswich and any significant decisions made will have a huge impact on this community.

Statutory Consultees

The following comments were made in response to this issue:

25596	Department for Education (DfE)	The DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for school places. Please add the DfE to your list of relevant organisations which you engage with in plan preparation.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25841	Ravenswood Environmental Group	The Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters is weak. Given that Ipswich cannot meet its own development needs it is of some concern that a closer working arrangement has not been created. Ipswich is an important sub regional centre. The other two similar centres in the region are Norwich and Cambridge. Norwich City is planned as part of the Greater Norwich Local Plan. Cambridge is planned with South Cambridgeshire as Greater Cambridgeshire but Ipswich is not coordinating its growth on the same statutory basis. Consideration must be given to a joint Local Plan.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25650	Turnberry Consulting on behalf of Grainger PLC	A series of Statements of Common Ground have been prepared by the Ipswich Strategic Planning Area (ISPA). It is clear that housing land supply has already fallen and that no attempts to remedy the shortfall within the early years of the plan across the ISPA have been made. Ipswich Borough and Suffolk Coastal have not worked collaboratively to resolve Ipswich's unmet housing delivery need to find more sites in the early years of the Plan Period. Both Councils have failed in their duty to cooperate and both Plans are not legally compliant and contrary to paragraph 26 of the NPPF.
25912	Turley on behalf of Pigeon Investment Management Ltd	Pigeon are supportive of the fact that a working draft Statement of Common Ground (November 2018) has also been published alongside the Ipswich Local Plan Review. This sets out that one of the strategic cross-boundary matters to be addressed is 'agreeing the approach to the delivery of the housing requirement'. It adds that 'throughout the plan-making process should any authority identify

		<p>that their overall land supply falls below that required to meet the housing need, further co-operation will be required across the ISPA to identify potential solutions to inform distribution across the ISPA'.</p>
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The following made no comments in response to this issue.

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Council can confirm that the DfE is on its consultation database. The Council aims to actively engage with DfE and other relevant organisations during the planning policy development process. The Council have met regularly with Suffolk County Council to consider the implications of planned growth on school capacity and has safeguarded sites for new schools and the expansion of existing schools.

ISPA policies ISPA1, ISPA2 and ISPA3 have been prepared in consultation with partner authorities within the Ipswich Strategic Housing Market Area and align with the Statement of Common Ground and demonstrating the Council's commitment to collaborative working.

The Council is committed to working with the authorities in the Ipswich Strategic Planning Area/Ipswich Housing Market Area on cross boundary strategic issues.

The Council is working closely with those authorities in the Ipswich Housing Market Area, through the Ipswich Strategic Planning Area Board. The authorities have agreed an approach to the delivery of key strategic matters including the delivery of housing requirement. With the new, lower housing requirement resulting from the Government's standard method and the 2014-based household projections, the Council can meet Ipswich's housing need within the Borough across the plan period and with this in mind the Statement of Common Ground is considered fit for purpose.

Ipswich has adopted a stepped housing requirement for different years of the plan, an approach supported by the NPPF. NPPF Guidance states (para 034, 13/09/2018) that where strategic sites will have phased delivery, a stepped housing target may be appropriate. Therefore, whilst there will be a shortfall of housing delivered in the early years on the plan, delivery will increase during the later years, as larger projects such as Ipswich Garden Suburb come online. This is considered sufficient justification for adopting a stepped approach in Ipswich. The Council has worked closely with authorities within the Ipswich Strategic Planning Area to bring forward a cross boundary site at Humber Doucy Lane. This collaborative approach is helping Ipswich to meet its own housing need.

The Council has identified sufficient land to meet its objectively assessed need. It has also identified a 5.07-year supply. However, a number of sites have difficulties such as complicated ownership or severe constraints such as archaeology which may mean they will take longer to come forward. These have been identified as 'opportunity sites', however they have not been counted as sites helping to meet the Ipswich objectively assessed need. The Council has undertaken a number of steps to address housing supply issues eg it undertook a complete review of site density that identified an

additional circa 600 dwellings, but this was counteracted by sites which have had to be removed from the Plan for example, to meet educational requirements. It also has taken a relatively radical approach to the Housing Delivery Plan to try to ensure sites come forward.

The Council has and is working proactively to produce an effective Statement of Common Ground with neighbouring authorities within the Ipswich Housing Market Area.

5. Chapter 5 – Ipswich – The Place

Representations	Comments	Object	Support
1	0	0	1

Other Organisations

The following comments were made in response to this issue

Rep. ID. No.	Respondent	Summary
25771	RSPB	Support the inclusion of supportive text that sets out to enhance biodiversity. Consistent with national policy.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Support noted. In order to link the sustainability appraisal baseline assessment more effectively to the issues of the Borough, table A of the Sustainability Appraisal has been inserted into this chapter.

The table of vital statistics has been updated to take account of up-to-date evidence.

6. Chapter 6 – Vision and Objectives

Representations	Comments	Object	Support
15	0	15	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26043	Historic England	<p>Note reference to higher density homes but are concerned that it's treated as a synonym for flats. High density doesn't need to take the form of flats (see Increasing Residential Density publication 2018). Request is made clear that high density does not equal flats. Welcome references to parks and open spaces, built and natural heritage. However, we recommend that the phrase 'built and natural heritage' is amended to 'built, natural and historic environments'. We would like to see a flavour of the town's heritage reflected in the Vision similar to the descriptions for the town's parks and tree canopy.</p>
25701	Suffolk Chamber of Commerce	<p>Fully supports 'The Vision and Objectives'. Although we appreciate the need for more homes, we also hope the Council recognises the importance of further, high-quality business space in the town, including The Princes Street Corridor. We hope the Council will look to include further office space around the town which would also ease traffic and parking issues around The Princes Street Corridor. Mixed-use developments could help support this aim by providing homes, offices, shopping and leisure facilities near to one another. We strongly recommend that sites currently allocated for employment are sustained and if possible, further space is provided.</p>
25702	Suffolk Chamber of Commerce	<p>To support business growth and visitor numbers to Ipswich will require improvements to the transport network. Therefore, Suffolk Chamber of Commerce welcomes all improvements to the transport network including proposals for a Northern Bypass, improvements to the Orwell Bridge and an enhanced public transport system. Furthermore, with aims to reduce emissions, Suffolk Chamber feels strongly that cycling in Ipswich needs to be improved as the current infrastructure is lacking, and dangerous where it does exist. Similarly, much more needs to be done to deliver a viable network of electric vehicle charging points.</p>
25987	Suffolk County Council	<p>The most robust way this Plan could fulfil its potential in respect of health outcomes would be to undertake a formal Health Impact</p>

		<p>Assessment, separately, if this is not possible, through enhanced analysis of health issues through the Sustainability Appraisal.</p> <p>Design plays a significant role in promoting healthy built environments. It is hoped that the forthcoming countywide design guidance will provide a strong framework for detailed consideration of health as a design issue. The Borough Council should consider whether the Plan provides a strong policy hook for requiring the implementation of the health recommendations of the Design Guidance.</p>
25993	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 4: People in Suffolk have the opportunity to improve their mental health and wellbeing:</p> <p>The planning system can support better mental health by enabling and encouraging exercise and access to green space. Design can also contribute by discouraging feelings of being enclosed, creating places which feel safe and by creating environments which encourage social interaction. This could be covered in forthcoming countywide guidance on design, but the Plan could provide a policy hook.</p> <p>The Plan considers suitable community facilities, and the County Council will work with IBC in respect of library facilities.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25656	Northern Fringe Protection Group	<p>The Core Strategy removes the commitment to improve air quality despite the number of AQMAs in Ipswich continuing to increase.</p> <p>Objective 6 - Given the distinct lack of progress an additional indicator is required to measure improvements in cycling infrastructure.</p> <p>IBC needs to start taking more positive actions to improve accessibility as it is currently non-compliant with CS5.</p> <p>Objective 12 - This indicator is vague and gives no measure of beneficial outcomes from working together. Needs to include strategic infrastructure.</p> <p>The latest AMR for 2017/18 has not been</p>

		published and we need the opportunity to review this.
25865	Save our Country Spaces	The following issues need to be addressed for the core strategy to be 'sound': 1. Drainage/ surface water drainage 2. Likelihood of flooding increase. 3. Sewage proposals inadequate and likely to add to existing problems 4. Traffic proposals and adverse impacts on existing residents. 5. Air pollution and impact on our children's health inadequate. 6. Adverse pressures on Hospitals, schools and access to GPs and social care. 7. Adverse effects of road widening and removal of trees/ verges. 8. Loss of high grade land; 9. Removal of trees, hedgerows and habitats 10. Country Park delivery 11. Where is the need?
25867	Save our Country Spaces	The Plan goes against all the aims and ambitions of this local charity. It would have a detrimental effect on the charity and its aims and objectives. It will irretrievably damage the small spaces which the charity has been working on for 8 years.
25874	Save our Country Spaces	The following issues need to be addressed for the core strategy to be 'sound': 1. Drainage/ surface water drainage 2. Likelihood of flooding increase. 3. Sewage proposals inadequate and likely to add to existing problems 4. Traffic proposals and adverse impacts on existing residents. 5. Air pollution and impact on our children's health inadequate. 6. Adverse pressures on Hospitals, schools and access to GPs and social care. 7. Adverse effects of road widening and removal of trees/ verges. 8. Loss of high grade land; 9. Removal of trees, hedgerows and habitats 10. Country Park delivery 11. Where is the need?
26130	Ipswich and East Suffolk Clinical Commissioning Group	The CCG is glad to see the importance given to strategic planning for the provision of health care. NHS England and the CCG welcome the importance given to health and wellbeing and recognises the impact health and wellbeing

		<p>has on reducing impact on healthcare facilities.</p> <p>NHS England and the CCG are pleased to see so many policies in the LP with the objectives supporting healthy and active communities through improving health, wellbeing and education opportunities for all.</p> <p>The CCG would like to highlight the work being done at community level by the NHS in the area at preventing ill health.</p>
26131	Ipswich and East Suffolk Clinical Commissioning Group	<p>We would suggest that one of the key priorities of this document should be ensuring sustainable primary care provision for communities both existing and proposed.</p>

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25641	Turnberry Consulting on behalf of Grainger PLC	<p>The document is unsound and not legally compliant for reasons summarised:</p> <ol style="list-style-type: none"> 1. Ineffective as it does not allocate an adequate number of deliverable sites over the plan period to maintain the housing need of the Borough; 2. Fails to allocate sufficient land within its early phases to ensure the Borough's five-year housing land supply is met alongside a buffer to compensate for significant under-delivery of housing; 3. It heavily relies on a single strategic allocation; and 4. Fails in its Duty to Cooperate in terms of achieving a series of deliverable sites within the early stages of the Plan
25817	Cardinal Lofts (Mill) Ltd	<p>The Company supports the general vision as is set out at paragraph 6.7. It is also in general agreement with the Objectives (paragraph 6.8), but considers that there should be explicit recognition that, unless development is financially viable (or subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved.</p>
25926	Ashfield Land Limited	<p>We support the recognition in the vision that by 2036 a range of new homes should be provided across the Borough and, importantly, within the Housing Market Area, to meet needs. The amount of new homes needed</p>

		cannot be provided within the administrative boundary of Ipswich alone. It is therefore important to recognise the role of the wider Housing Market Area in the Vision. The Vision also rightly refers to growth in the Ipswich economy. To deliver this vision, it is important that the Local Plan provides for sufficient levels of growth.
25930	Ashfield Land Limited	Support the ambition for Ipswich namely boosting economic growth and housing delivery, to meet needs, unlock potential and support cohesive communities. Support the recognition that Ipswich sits within a wider area, which demonstrates strong functional relationships. We strongly agree with the need for joint, or aligned approaches given Ipswich's tight administrative boundary. Choices about directions for growth within the Borough at the edge of the town are limited. It is necessary to adopt a cross boundary approach. Disappointing that the Preferred Options does not plan for a more ambitious level of housing or economic growth (beyond the minimum starting point).

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

See 'Vision' and 'Objectives' responses below.

7. The Vision

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue.

Rep. ID. No.	Respondent	Summary
25746	Historic England	Support the Plan's vision to protect and enhance the natural environment The plan should take a strategic approach to the protection and enhancement of the natural environment, in accordance with paragraphs 170 and 174 of the NPPF and the Defra 25

		Year Environment Plan (YEP), including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies, Nature Recovery Network (amend as appropriate to the local area).
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25624	Private individual	Fully support vision for a greater mix of uses in the town centre to ensure that people will be drawn to the town centre. Retail uses alone will no longer achieve this. In Ipswich residential areas are largely detached from the town centre, placing residential development nearer or in the town centre will create a more vibrant and successful town.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

Support Noted.

The vision has been amended in accordance with Historic England’s comments.

The Vision has been strengthened to read: ‘future development will be adaptable to the implications of climate change impact.’. The Council is one of 117 Councils signed up to recognising the ‘climate change emergency’. The Local Plan has been updated throughout the document to recognise this where appropriate.

Other changes include: The objectives have been rationalised under subject headings, which better relate to the key issues across Ipswich and Suffolk. The indicators have been updated to ensure the data is obtainable and targets have been rationalised to ensure they are outcome focussed and reflect the highest priorities in the plan.

Objective 3, indicator 4 (proportion of new dwellings on previously developed land) has been amended to make clear that the Council actively supports the development of brownfield sites.

8. The Objectives

Representations	Comments	Object	Support
24	0	17	7

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25734	Environment Agency	Paragraph 6.13 states that sites alongside the river in much of central Ipswich reside within Flood Zones 2 and 3. We are pleased that the paragraph outlines the process involved when siting development within these flood zones.
25735	Environment Agency	This paragraph (Para 6.13) should also include reference to safe refuge. Safe refuge should be provided to any development within these zones (Flood Zones 2 and 3) to ensure they remain safe in times of flood from residual flood risk (i.e. from overtopping or breach).
25737	Environment Agency	In addition, the paragraph (6.13) also makes brief reference to SuDS. The paragraph should make clear that the use of infiltration SuDS may not be suitable at sites where contamination is present. Alternative SuDS features should be used in these circumstances.
25739	Environment Agency	The Ipswich Flood Defence Strategy (IFDMS) is referred to in Paragraph 6.15 and Paragraph 6.16. This section also outlines the work that began in 2008 to replace and raise the height of the floodgates in the Wet Dock lock. The Ipswich Tidal Defence Barrier is now operational and as such this should be specifically referenced.
25740	Environment Agency	The Ipswich Flood Defence Strategy (IFDMS) is referred to in Paragraph 6.15 and Paragraph 6.16. This section also outlines the work that began in 2008 to replace and raise the height of the floodgates in the Wet Dock lock. The Ipswich Tidal Defence Barrier is now operational and as such this should be specifically referenced.

25741	Environment Agency	We have also updated our coastal and estuary modelling in Ipswich. This includes the new barrier and it supersedes the modelling used in the SFRA and SPD. The existing SFRA refers to PPS25 which has now been replaced by the National Planning Policy Framework (NPPF) 2018 and is no longer based on the most up to date evidence. The SFRA suggests a framework for safe development which is detailed in the Flood Risk SPD (September 2013). We would suggest that the SPD could also be updated following the production of a revised SFRA.
25743	Environment Agency	We would suggest that the SPD could also be updated following the production of a revised SFRA. Section 7.3.4 of the SPD outlines the requirement for consideration of residual risk, specifically requiring temporary refuge above 0.1% annual probability flood level with climate change. Now the barrier is operational, if you choose to update your SFRA, you may wish to consider reviewing your refuge requirement. We are currently in the process of updating our River Gipping fluvial flood modelling which should be also considered.
25744	Environment Agency	If no update to the SFRA is carried out, then refuge capability should be judged on the worst case of the existing breach modelling (from the old SFRA/SPD) or the current extreme tide (with climate change) overtopping of the system from our new coastal modelling.
26044	Historic England	We particularly welcome objectives 1 on high standards of design, 5 on enhancing the public realm of the town centre, and 8 about conserving and enhancing the historic environment and landscape character. Welcome the commitment at 6.10 in principle to regenerate the run down areas close to the historic core.
25972	Babergh Mid Suffolk District Council	The Councils express support for Objective 6 regarding improving accessibility to all forms of transport and achieving significant modal shift from the car to more sustainable modes through local initiatives as expressed in policies such as CS5, CS20, DM20 and DM22. It should be emphasised within this objective of the role Suffolk County Council has in delivering improvements. Support Objective 12 regarding a co-ordinated

		approach to planning and development within the ISPA. However, it must be recognised that in meeting the housing needs of the IHMA, each local planning authority is to meet their own needs within their Local Plans.
25994	Suffolk County Council	The County Council also supports efforts in the Plan to promote healthy and active travel, and to improve air quality. This will need to be the subject of further discussion in respect of our shared approach to managing the transport impacts of development.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25915	Ipswich Faith and Community Forum	We endorse the Local Plan objectives of supporting communities and the reduction of deprivation and inequalities.
25916	Ipswich Faith and Community Forum	We agree that the objective of attracting national and voluntary sector organisations to form a base in Ipswich and increase employment in those areas would be welcome by those who live in the town.
25919	Ipswich Faith and Community Forum	We think that section 6.8 para 9. "To retain and provide high quality schools, health facilities, sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth and ageing population" is particularly valuable.
25924	Ipswich Faith and Community Forum	We feel that section 6.8 para 9 needs to go further. In particular the special needs of recent new arrivals also need to be considered. It is not unusual for such groups to tend to look to those with a similar cultural background for mutual support and they often have very strong links to their faith, language and cultures. At the same time, they need to have opportunities and encouragement to full integrate with the existing population. We feel therefore that their needs and the needs of their adopting communities could benefit from special consideration.
25665	Northern Fringe Protection Group	New objectives are required to ensure delivery of key aspects of the Core Strategy such as

		improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on.
25668	Northern Fringe Protection Group	Objective 6.8.6 needs to be amended to include the requirement of a northern route around Ipswich to deliver the Local Plan and for consistency with Policy ISPA2 Strategic Infrastructure Priorities a) Ipswich Northern Routes. Objective 6.8.7, and the rest of the Core Strategy document, needs to be updated to recognise that a new flood barrier is already in place
25838	Ravenswood Environmental Group	The Local Plan Documentation does not deliver upon the stated Objectives and does not comply with significant swathes of national planning policy contained in the NPPF (February 2019) and elsewhere. Notably the Local Plan Policies and their associated justification conflict with chapters 3, 5, 8, 9, 12, 14, 15 and 16 of the NPPF. It is alarming that the plan already fails to meet basic requirements of plan making as initially set out in paragraph 16 of the NPPF.
25772	RSPB	Strategic Objective 8 - support the positive intent to have open spaces rich in biodiversity. Consistent with national policy.
25613	Suffolk Wildlife Trust	We support the references in the Objectives 5 and 8 to protecting, enhancing and extending the Borough's strategic greenspace and ecological networks.
26137	Ipswich and East Suffolk Clinical Commissioning	Objective 9 - While we recognise that neighbourhood planning would ideally like to promote community facilities located in or within 800m of a centre this is not always possible with primary care provision. The CCG would not be able to endorse the objective and would look at expanding current surgeries or co-locating surgeries to mitigate against projected patient numbers. Options are currently being looked at for the larger proposed developments as to how to provide primary healthcare. Objective 12 - Welcome opportunity to work closely with ISPA officers to allow a more holistic view of strategic planning going forward.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25927	Ashfield Land Limited	The figures reflect the baseline forecasts/projections. National policy is supportive of authorities planning for levels of growth above the baseline. As it stands, the Preferred Options plans for a level of growth that is below that previously indicated by joint SHMA. The Local Plan should include housing and job figures that plan for growth, rather than the minimum. The figures proposed in the Preferred Options document fail to support growth in the ISPA. The economic growth ambition is not reflected in the level of new homes and jobs being planned for.
25929	Ashfield Land Limited	We support the recognition that the Council should work with other local authorities in the ISPA to ensure a coordinated approach to planning and development.

Parish and Town Councils

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25625	Individual	Support modal shift from car to sustainable modes of transport, but this requires more than just the local plan, it needs a collaborative approach from the bus operators, and proper policing to stop inappropriate policing and people driving in bus lanes. "Additional east-west highway capacity could be provided within the plan period" - unsure how this could be achieved without Wet Dock Crossing.

How these comments have been taken into account in the Final Draft Local Plan:

The Environment Agency's suggested replacement wording for objective 7 has been implemented accordingly. The Environment Agency's recommended re-wording of the supporting text have been implemented accordingly.

The housing (see Policy CS7) and jobs (see Policy CS13) needs in objective 3 have been updated to reflect changes in national policy and new evidence.

9. Chapter 7 – The Key Diagram

Representations	Comments	Object	Support
2	0	2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25794	AONB	For accuracy the small area of the Suffolk Coast & Heaths AONB that falls within Ipswich Borough's administrative boundary should be shown indicatively on the Diagram 3 - Key Ipswich in the combined Core Strategy and Policies Development Plan Document Review.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25562	Kesgrave Covenant	In summary, we support the inclusion of land within our client's control at Humber Doucy lane for inclusion within the Core Strategy. As set out in the attached more detailed representation, this is a sustainably located and deliverable site on the edge of Ipswich. the Key Diagram shows this site as a 'broad location' and we submit that it should be an allocation in accordance with policy SCLP12.24 of the Suffolk Coastal Final Draft Local Plan. The Ipswich draft Core Strategy should also provide increased flexibility to enable the site to come forward prior to 2031.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The key diagram has been amended to show the Humber Doucy Lane (ISPA4.1) site as a housing allocation for future development rather than a broad location for future development as it was originally shown.

The river corridor has been extended to run the full length of the river to align with the blue corridor aspiration of the Local Plan.

The ‘Green Rim’ has been renamed to the ‘Green Trail’. This is to provide greater clarity regarding the long-term aspiration for this land.

The extent of the AONB has been inserted onto the key diagram.

10. Chapter 8 – The Spatial Strategy

The Ipswich Strategy Planning Area

Representations	Comments	Object	Support
4		3	1

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26035	Sproughton Parish Council	The Council expresses concern for development along the B1113/A14/River Gipping Corridor because the Wild Man Junction in Sproughton is a pinch point that is already one of the most congested and polluted junctions in the county. This is a problem that transport and planning departments in all the local authorities appear to be ignoring with their heads in the sand.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25970	Babergh Mid Suffolk District Council	Full opportunity and capacity to meet identified housing land needs should be explored. The Councils seek a re-phrasing of Paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan.

		The Babergh and Mid Suffolk Joint Local Plan housing numbers will be identified upon the publication of the national housing price affordability data schedule for March 2019. Babergh and Mid Suffolk Councils are committed to cross boundary strategic planning across the Ipswich Housing Market Area and have worked to develop shared evidence and policy approaches.
26064	Suffolk Coastal and Waveney District Councils	Policies ISPA1 'Growth in the Ipswich Strategic Planning Area', ISPA2 'Strategic Infrastructure Priorities' and ISPA3 'Cross-boundary mitigation of effects on Protected Habitats and Species' of the Core Strategy and Policies Review Preferred Options, similar to Chapter 2 of the Suffolk Coastal Final Draft Local Plan, are reflective of the Statement of Common Ground and the role that the ISPA authorities will have in the delivery of growth and supporting infrastructure in this wider strategic planning area. The Council therefore endorses the provisions and aims that are set out within these policies. The Council is committed to collaborative working.
26014	Suffolk County Council	Have been joint-working with IBC and other ISPA authorities to model impacts of local plan growth. The latest assessment has been published alongside the Regulation 19 consultation of the SCDC Local Plan. It shows significant pressures on the network in Ipswich and certain A14 junctions. The County is seeking to work with ISPA Authorities to develop more detailed proposals for limiting impacts of development through promoting sustainable modes of travel and means of securing funding. Plan will need to include mechanisms to ensure funding of highway and sustainable transport improvements and possibly require policy for specific modal splits in development.

The following made no comments in response to this issue.

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The land in Sproughton is outside the administrative boundary of Ipswich Borough Council and therefore cannot be managed through this Local Plan. The Council is working with the other ISPA authorities, including transport modelling and mitigation, which will factor in the cumulative impact of developments inside and outside the Borough boundary on the local transport network.

Table 8A demonstrates the key transport infrastructure that new development will need to support. Policy CS17 sets out the Council’s proposed approach to securing funding towards necessary infrastructure improvements.

The supporting text of this policy has been amended to reflect national policy changes to the means of assessing and determining housing needs. In addition, table 8.1 has been updated to demonstrate the changes to housing needs across the ISPA in light of the national policy changes. Paragraph ‘b)’ of the policy wording has been amended to take account of this reduced overall housing figure for the ISPA area.

Paragraph 8.7 has not been amended. Additional wording has been added to paragraph 8.11 (Policy ISPA1) to clarify that policy CS7 sets out the housing requirement identified for Ipswich Borough and how it will be met. The ISPA Statement of Common Ground identifies circumstances that would trigger a Local Plan review in relation to any ISPA authority’s ability to meet its own housing need.

11.ISPA1 - Scale and location of growth

Representations	Comments	Object	Support
5	0	4	1

Parish and Town Councils

The following comments were made in response to this issue:

26040	Sproughton Parish Council	The Council has concerns about overdevelopment of our Parish which, although adjacent to Ipswich, remains a rural village with a significant number of listed historic buildings that have a sense of place set within the countryside that surrounds Sproughton. This farmland based countryside is in itself historic being South of the Gipping divide it forms the North East corner of the more fertile land that is recognised as having the earliest history of agricultural development in the area. It has a local Special Landscape designation which is entirely appropriate with its history, visual value and mix of Landscape Character Types.
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Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25747	Natural England	We advise that the potential impacts of this policy are assessed to determine the suitability of the existing Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) in mitigating the effects of increased recreational disturbance to Suffolk's coastal, estuarine and heathland European sites as a result of strategic growth. The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed and measures to address adverse impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF.

Developers and Landowners

The following comments were made in response to this issue.

Rep. ID. No.	Respondent	Summary
25931	Ashfield Land Limited	We do not support the level of new jobs and homes planned for in Policy ISPA1. The level of growth reflects the minimum baseline only. The plan should deliver a more ambitious level of growth that reflects the role of Ipswich as a driver for economic growth in the wider sub-region.
25642	Turnberry Consulting on behalf of Grainger PLC	The newly published housing projections have in fact increased the local housing need within the Borough (and majority of the Councils forming the Ipswich Strategic Housing Market Area). We therefore agree with the approach adopted within the Preferred Options document, which uses the 2016-based household projections, as it still continues to support the Government's objective of "significantly boosting the supply of homes" (NPPF Paragraph 59). However, note that these should be interpreted as a minimum housing need as outlined in paragraph 60 of the NPPF.
25563	Kesgrave Covenant	We generally support this policy in terms of the identified targets and commitment to joint working. As detailed in the attached submission, land within our client's control falls within both Ipswich Borough's boundary and

		Suffolk Coastal District and through a master planned approach can deliver an extension to the built up area of Ipswich.
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The following made no comments in response to this issue.

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The RAMS was produced taking into account the level of development proposed in the adopted Ipswich Local Plan. This was because the emerging local plan was not sufficiently advanced at the time the partnering authorities commissioned the work. In addition, the commissioning authorities including Ipswich Borough has worked closely with Natural England in the course of developing the RAMS. It has been proposed by the partnering authorities that there will be an early review of the RAMS which will take account of the emerging Local Plan for Ipswich which is planned to be submitted to PINS March 2020 with a view to adoption being late in 2020/early 2021. It would therefore be premature to carry out an assessment against the emerging local plan as it is subject to change.

Policy ISPA 1 is a high-level strategic policy which seeks to ensure that growth is achieved without severe detriment to quality of life and to ensure protection of high quality environments and therefore no changes are proposed concerning specific sites. However, it should be noted that the strategic aims of Policy ISPA 1 are designed to ensure that the impact of site development does not adversely affect the locality including Sproughton. The landscape value of this area is highlighted through the Settlement Sensitivity Assessment (July 2018) which was commissioned jointly by the ISPA authorities.

The originally proposed 2016-based household projections that were used for the housing figures across the ISPA were set as a minimum. However, it should be noted that the figures have since been revised to reflect the 2014-based household projections as required under the Government guidance.

In terms of the land at Humber Doucy lane, it is already proposed that a joint Master Plan approach is envisaged between East Suffolk and Ipswich Borough Councils to develop the adjoining sites across administrative boundaries. This is set out in policy ISPA4.

Ipswich housing needs have been identified through the SHMA which is based on sound research. No change proposed. The early stages of plan-making have also been informed by the published draft SHELAA which reviewed sustainable available housing and employment land. The jobs forecast and employment land minimum levels have been decreased to reflect the latest 2017 East of England Forecasting Model (EEFM) data which shows a 40% reduction in jobs in Ipswich compared to the

2016 EEFM. This is therefore explained and justified in the supporting text. Paragraph 'a)' of the policy wording has been amended to reflect this change in anticipated jobs growth.

A sentence explaining that the Council has commissioned an update to the retail element of the Retail and Commercial Leisure Study (2017) has been included for clarity.

12.ISPA2 - Infrastructure

Representations	Comments	Object	Support
6	0	5	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25687	Anglian Water	Anglian Water is generally supportive of Policy ISPA2 which identifies strategic priorities for infrastructure provision within the Borough and collaboration with utility companies including Anglian Water to its delivery. Reference is made to both the water supply network and sewage treatment but not the foul sewerage network. It is therefore proposed that Policy ISPA2 is amended as follows: 'i) improvements to water supply, foul sewerage and sewage treatment capacity
25590	Department of Education (DfE)	The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure, not least schools, in policy ISPA2, including references to ensuring infrastructure provision meets needs, timely delivery of infrastructure alongside development and requirements for developer contributions.
25748	Natural England	Increased traffic, the construction of new roads and the upgrading of existing roads can negatively affect designated sites due to air quality impacts. We recommend that potential impacts to vulnerable sites are assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. Large infrastructure opportunities to secure net gains for biodiversity and wider

		environmental gains (HRA, page 9), please include within the supportive text of the policy. Policy requirements for large infrastructure projects to deliver measurable biodiversity net gain, in accordance with NPPF and Defra 25 YEP, should be included with relevant policies.
26065	Suffolk Coastal and Waveney District Councils	The Council supports this policy, however, would like to highlight that the equivalent policy in the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.2) also includes reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural greenspace. It is suggested that policy ISPA2 should also include reference to these strategic infrastructure priorities.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25614	Suffolk Wildlife Trust	We consider that policy ISPA2 should also include delivery of strategic green infrastructure alongside the other types of infrastructure listed.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26144	Private individual	It is proposed that during the 12-year build of Sizewell C there will be up to 1,500 HGV daily arrivals at the site. 85% of these are to come from the south, over the Orwell Bridge. This means that when the Orwell bridge closes, such as on windy days there will be 1,275 HGVs going north through Ipswich and 1,275 HGVs coming south through Ipswich. In the information about traffic provided by EDF for the Stage 3 Sizewell C consultation there are inconsistencies. In addition, there is a lack of supporting evidence such as the traffic models used.

The following made no comments in response to this issue.

**Parish and Town Councils
Developers and Landowners**

How these comments have been taken into account in the Final Draft Local Plan:

Reference to foul sewerage has been added to the policy as requested by Anglian Water.

In terms of the suggested reference to green infrastructure, it is considered that this the relevant core strategy policy CS16 would address this matter. In addition, ecological and landscape policies such as DM8 and DM10 highlight the cross-boundary nature of these two functions.

The suggested addition of police, community safety and cohesion provision has not been included as this is felt to be too niche of an issue to identify specifically in this strategic level policy. It is instead best served where appropriate in the core strategy and development management policies. Furthermore, it has not been recommended by the Suffolk Constabulary who are the lead consultee on these matters.

It has not been determined as to whether the Sizewell C development will proceed or not at this stage of plan-making.

The potential risks to the Orwell Estuary from traffic/ air pollution are considered to be low due to the nature of habitats present, with estuarine habitats being less sensitive than other habitat types within the Suffolk European sites. A conclusion of no adverse effect on site integrity is drawn at this plan level. Any development in very close proximity to the Orwell Estuary should check for any air borne pollutant risks, over and above general traffic generation. Policy DM3 also provides for this.

The need for biodiversity net gain has been factored into policies throughout the Local Plan.

13.ISPA 3 - Protection of the environment

Representations	Comments	Object	Support
9		5	4

Parish and Town Councils

The following comments were made in response to this issue:

26038	Sproughton Parish Council	Another policy which piqued the Council's interest is the development of a "RAMS Strategy" which could be used to avoid damage to areas of scientific interest when it comes to development. It is encouraging to see that Babergh District Council, IBC, MSDC and Suffolk Coastal DC have all signed a Statement of Common Ground when it comes
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		to this strategy and hope that this will also be used to assess sites in more detail in rural areas such as our Parish.
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Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25749	Natural England	Natural England supports and welcomes the Council's commitment to a cross boundary approach to recreational disturbance. We advise that the supplementary planning document is assessed to ensure that the delivery of strategic projects is sufficient to mitigate additional impacts.
25615	Suffolk Wildlife Trust	We support the cross-boundary approach proposed in this policy for assessing and mitigating impacts on European designated sites.
25974	Babergh Mid Suffolk District Council	The Councils would express support for the approach to the Recreational Avoidance and Mitigation Strategy referred to in policy CS17 and paragraphs 8.21 and 8.202.
26066	Suffolk Coastal and Waveney District Councils	The Council welcomes the commitment to continued joint working to address the issue of recreational impact avoidance and mitigation. This policy reflects the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.3) and this aligned approach is supported.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25795	AONB	This section (para 8.20) needs to be amended to recognise that new developments have the potential to significantly impact on the Suffolk Coast & Heaths AONB as well as Special Protection Areas, Special Areas of Conservation and Ramsar sites. Such developments will need to be carefully assessed through LVIA including an assessment on impacts on Natural Beauty of the nationally designated landscape. This

		should be referenced in the Local Plan for clarity.
25773	RSPB	Paragraph 8.20 - Line 4 should read Birds and Habitats Directives (and this should be consistently applied throughout the document).

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26071	CBRE	The draft policy recognises the need for cross-boundary working to address potential effects on protected habitats and species. We fully support such an approach but advocate that this be accompanied by a holistic approach to mitigation which recognises that RAMS should provide a suite of mitigation measures including the Ipswich Garden Suburb ('IGS') Country Park which allows for a responsive approach to development proposals. The separation of the IGS Country Park from RAMS risks a piecemeal approach to mitigation and an adverse impact on delivery of sites.
26077	Mersea Homes Limited	The draft policy recognises the need for cross-boundary working to address potential effects on protected habitats and species. We fully support such an approach but advocate that this be accompanied by a holistic approach to mitigation which recognises that RAMS should provide a suite of mitigation measures including the Ipswich Garden Suburb ('IGS') Country Park which allows for a responsive approach to development proposals. The separation of the IGS Country Park from RAMS risks a piecemeal approach to mitigation and an adverse impact on delivery of sites.

The following made no comments in response to this issue.

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The clarifications requested by the RSPB have been incorporated into the policy.

The draft Suffolk Coast RAMS SPD will be published for consultation during summer 2019. The Council would welcome comments on the suitability of the draft SPD. The mitigation set out in the technical report has been developed following an analysis of mitigation used elsewhere in other strategic mitigation schemes, stakeholder workshop outputs and an understanding of local circumstances in terms of site context and issues and opportunities. The combination of measures developed and targeted after analysis of available and gathered information, should give Natural England the necessary certainty. A review of the strategic approach to the Strategy will take place within 18 months of its adoption.

Paragraph 8.20 has been amended to recognise that new development has the potential to impact on the Suffolk Coasts and Heaths AONB, as well as Special Protection Areas, Special Areas of Conservation and Ramsar sites.

Ipswich Borough Council is committed to working together with East Suffolk and Babergh Mid Suffolk to address the issue of recreational impact avoidance and mitigation.

Where housing growth will be significant in one particular location, large scale natural greenspaces are an additional measure, delivered individually within development projects, to provide an alternative to recreation on European sites are referred to as Suitable Alternative Natural Greenspaces (SANGs). The country park at IGS constitutes additional mitigation and as such does not form part of the RAMS.

14. ISPA4 - Delivering Development at the Borough Boundary

Representations	Comments	Object	Support
24		23	1

Statutory Consultees

The following made no comments in response to this issue.

Rep. ID. No.	Respondent	Summary
26067	Suffolk Coastal and Waveney District Councils	Support principles of policy which contributes towards each authority meeting housing needs within their area. The SCDC Plan Infrastructure Delivery Framework provides detail of the infrastructure to support development and policy (SCLP3.5) also supports this. Similar detail relating to infrastructure could be included in the Ipswich Plan, reflecting the Annex to the SOCG. For consistency with DM11, policy for development at the northern end of Humber Doucy Lane should reference the maintenance of separation between Ipswich and surrounding settlements. From 1st April 2019 the new East Suffolk

		Council will be created, and references to SCDC in the Plan should be updated.
26007	Suffolk County Council	<p>Welcome the policy commitment to a coordinated approach to the cross-boundary development proposals north of Humber Doucy Lane.</p> <p>Transport mitigation at this location will be challenging, hence sustainable links to employment and key services must be the priority, coordinated through strong Travel Plans to encourage significant modal shift and a contribution to wider sustainable measures. Further investigation of highway improvements may be necessary.</p> <p>Based on Plan 1, the nearest local/district centre is some distance from the development; more than 400m. The Council should consider incorporating a requirement for a new local centre in this area, to be determined through master planning.</p>

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25541	Rushmere St Andrew Parish Council	Object to allocation of housing development at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. Road improvements required prior to development in this location.
25556	Rushmere St Andrew Parish Council	<p>Concerned about the inclusion of land at the northern end of Humber Doucy Lane near Tuddenham Road. Concerns regarding the implications for increased traffic on the Woodbridge-Claydon corridor via Playford road, Rushmere Street and Humber Doucy Lane.</p> <p>Development should not take place until a northern relief road has been developed. Large developments are included in the Suffolk Coastal Local Plan for Brightwell Lakes, Suffolk Police Headquarters and Humber Doucy Lane.</p> <p>This together with the mentioned allocation in the Ipswich Local Plan demonstrate that this plan should make provision for enhancements</p>

		for roads both within Ipswich Borough and neighbouring authorities.
26039	Sproughton Parish Council	The Council would not like to see any development on our Special Landscape/Protection Areas (such as Chantry Vale and Hope Farm) which should be taken into very serious account before even considering developments of any size. and hope that Sustainability Assessments can help us in this.
25836	Tuddenham St Martin Parish Council	The Parish Council have concerns, and object to, the inclusion of 'a broad location' at Humber Doucy Lane and Tuddenham Road. The documents state that this Local Plan sets out the strategy for future development of Ipswich to 2036 but insufficient information is provided about what is proposed at this location. The Parish Council are disappointed that only vague details for this location are included and this site has not previously been included for consultation. It has been difficult to obtain information about the allocation. This development would result in the physical separation being further diminished between Ipswich and villages.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25591	Department for Education (DfE)	The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure, not least schools, in policy ISPA4, including references to ensuring infrastructure provision meets needs, timely delivery of infrastructure alongside development and requirements for developer contributions.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25664	Northern Fringe Protection Group	<p>The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is unsound. The Settlement Sensitivity Assessment recognises the sensitivity of the open land and in our view this land is too important and sensitive to be built on. Additional homes should be provided in the empty retail shops and vast allocations in the town centre instead.</p> <p>Traffic modelling shows that there will be significant over-capacity.</p> <p>There should be no development here until the completion of the IGS. This needs to be made clear.</p>
25669	Northern Fringe Protection Group	<p>The allocations of land at the northern end of Humber Doucy Lane (ISPA 4) is in breach of policies CS16 (Green Rim), DM8 (The Natural Environment), DM10 (Green Corridors) and is also counter to the principles of policy DM11 (Countryside).</p> <p>This allocation is also in breach of the current Core Strategy in relation to corresponding policies and Diagram 3 (The Ipswich Core Diagram) where it is designated as Green Rim. Insufficient evidence has been provided to justify this change of classification from countryside.</p> <p>The North East Character Study recognises the benefits of this site as a rural buffer.</p>
25861	Save our Country Spaces	<p>Do not support this proposal which is in conflict with policies DM10, DM11, Plan 5, CS1, CS2, CS3 and CS4.</p>
25866	Save our Country Spaces	<p>Also see representation 25865.</p> <p>Ipswich has not taken SCDC Neighbourhood Plans nor Parish Council submissions into account.</p> <p>The plan does nothing to address the long-standing deficit in Open Space in North and East Ipswich.</p> <p>The public notices are in wrong locations.</p> <p>The area is a green corridor and development would be in breach of CS16.</p> <p>Development will adversely impact on the sensitivity of the Fynn Valley and needs to address light pollution and heritage.</p> <p>Need to protect post-brexit "best and most versatile" Grade 2 farm land.</p> <p>Will lead to coalescence of Westerfield,</p>

		Tuddenham and Ipswich. See Northern Fringe Comments.
25876	Save our Country Spaces	Do not support this proposal, which is in conflict with policies DM10, DM11, Plan 5, CS1, CS2, CS3 and CS4. Challenge the need for this development on the basis: 1. This land was identified as sensitive to development in the Landscape Settlement Sensitivity Assessment. 2. There are opportunities to deliver housing in the town centre and less retail. 3. Traffic modelling shows junctions in this area at over-capacity. 4. The North East Character Study recognises the benefits of this site as a rural buffer.
25876	Save our Country Spaces	Ipswich has not taken SCDC Neighbourhood Plans nor Parish Council submissions into account. The plan does nothing to address the long-standing deficit in Open Space in North and East Ipswich. The public notices are in wrong locations. The area is a green corridor and development would be in breach of CS16. Development will adversely impact on the sensitivity of the Fynn Valley and needs to address light pollution and heritage. Need to protect post-Brexit "best and most versatile" Grade 2 farm land. Will lead to coalescence of Westerfield, Tuddenham and Ipswich. See Northern Fringe Comments.
25616	Suffolk Wildlife Trust	Whilst we note that this policy includes reference to a 'green rim' for walking and cycling, it should be expanded to make reference to cross-boundary working to deliver strategic green infrastructure. Such green infrastructure should deliver benefits for both people and biodiversity and help new developments deliver biodiversity net gain.
26136	Ipswich and East Suffolk Clinical Commissioning Group	The possibility of issues arising from developments near to local authority boundaries with regards to healthcare provision is prevalent in the LP. The developments of Ipswich Suburb, continued development of Ravenswood and Whitton are examples of these possible cross boundary developments. Communication and

		cooperation will be vital in making sure that all appropriate stakeholders are aware of developments and mitigation can be sought in a timely manner. Cooperation will be required between the CCG, IBC, SCDC and BMSDC to make sure that the land North of Ipswich in both local plans is accounted for in mitigating health.
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26078	Mersea Homes Limited	Positive that recognition, consistent with the draft SOCG on Strategic Cross Boundary Planning Matters which deals with matter of working with adjoining authorities (albeit the reference at outcome/agreement point C3 should be strengthened). However, the policy doesn't provide assurances required in plan-making and should offer more than a commitment to 'work with' the adjacent authority, and on a general basis. Given the scale of growth required to meet Ipswich's housing need, the consistent under-performance and its constrained boundaries, a commitment to cross-boundary cooperation is necessary. The relationship between Ipswich and its hinterland (adjacent authorities) justifies a strong commitment to joint-working.
26063	Strutt & Parker on behalf of Bloor Homes Eastern	The site (appendix A/B) provides a medium-term opportunity for IBC and SCDC and the ISPA board to extend the spatial approach for development in North-East Ipswich by the identification of a Garden Village site to the north of Humber Doucy Lane, Rushmere St. Andrew. This will support the delivery of new housing, employment floorspace, transport and community infrastructure to meet the needs in the latter part of the Plan Period and beyond. It will maintain the necessary separation from Rushmere St. Andrew. It is a significant cross-boundary opportunity that should be referenced in ISPA4 and supporting paragraphs 8.24 - 8.27

25649	Turnberry Consulting on behalf of Grainger PLC	The Borough has clearly not exhausted reasonable alternatives within the area east of Ipswich for housing and therefore has not fulfilled its duty to cooperate with neighbouring authorities. As highlighted in Suffolk Coastal's Final Draft Local Plan, the area east of Ipswich presents opportunities to deliver housing within proximity to Ipswich Town Centre in a location that is already well served by infrastructure. Site 520 identified at Kesgrave within Appendix D (Alternative Sites) of Suffolk Coastal District Council's Sustainability Appraisal offers an opportunity to deliver housing within the early stages of the Plan period to meet Ipswich's unmet need.
25564	Kesgrave Covenant	We support the inclusion of land within our client's control at Humber Doucy Lane on the northern edge of Ipswich, however it is submitted that these sites should be an allocation rather than a broad location. this would accord with the approach taken by Suffolk Coastal District Council in their draft policy SCLP12.24 of the Suffolk Coastal Final Draft Local Plan. Furthermore, we submit that the plan should provide increased flexibility to come forward before 2031. Further details in relation to this site are set out int the attached representation.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25583	Private individual	The following aspects need to be fully before any development: Drainage Flooding Sewage Additional Traffic Air Pollution Extra Pressures on Schools, Hospitals and GP's Road Widening Loss of Farmland
25576	Private individual	Contest developments along the north of Humber Doucy Lane. Existing traffic at capacity. This is exacerbated by cars parked outside homes. There is

		<p>frequent queuing half way down Humber Doucy Lane between 8-9am, how will the roads accommodate further traffic?</p> <p>There is no pedestrian walkway along the upper part of the road, how would residents walk safely?</p> <p>Detrimental effects on health and pressure on local facilities/ services.</p> <p>Development would affect house prices/ quality of area.</p> <p>Detrimental impact on character and desirability of local area.</p> <p>Loss of habitat and species</p> <p>Loss of landscape and countryside views.</p>
25584	Private individual	<p>Commented about lack of direct notification/ consultation about Humber Doucy Lane proposals.</p>
25582	Private individual	<p>The proposal fails to fully consider: transport; air quality; economic and waste water issues specifically that the viability of development of the Garden Suburb, in conjunction with other cross boundary proposals, may not be sustainable achieved due to the severe impact. The plans are unsound and not compliant with the NPPF.</p> <p>The 'Climate Change' agenda is insufficiently addressed and contrary to NPPF paragraph 10. The effects are inadequately and inaccurately assessed against HRA and the SA and not complaint with NPPF 6-17.</p> <p>Ten specific issues (drainage, flooding, sewage, traffic, air pollution, local facilities, trees, soil, habitats and countryside) raised.</p>
26124	Private individual	<p>Will create an urban effect in a rural area, destroy habitats, trees, hedges and crops.</p> <p>Will create air pollution and drainage issues which are already at capacity.</p> <p>Traffic infrastructure is not capable as Tuddenham Road is a main route from surrounding villages into Ipswich. Humber Doucy Lane is also used as a main route and traffic can't cope. The local high school and primary school are at capacity.</p> <p>Fails to take adequate and comprehensive account of transport, air quality, economy and wastewater. Contrary to designated green space and green rim policies.</p> <p>Other applications in this area refused.</p> <p>Traffic safety concerns.</p>

How these comments have been taken into account in the Final Draft Local Plan:

It is accepted that additional work is required to provide clarity on how this future development cross-boundary site will come forward. The landscape sensitivity assessment provides useful guidance on how in urban design terms this can take account of the sensitivities of the location in a meaningful and productive way (see Volume 1 pages 17-18 Settlement Landscape Analysis) rather than providing a barrier to new development in the vicinity.

Both East Suffolk and Ipswich Councils have agreed that the combined site is best programmed later in the plan period or not before the substantial completion of the Ipswich Garden Suburb. In line with the Inspector's comments on the emerging Suffolk Coastal Local Plan and the ISPA Statement of Common Ground, the wording has been amended to reflect this position. This will ensure that an oversupply does not impact adversely on the Ipswich housing market and so Years 11-15 in the plan period is appropriate. The Council is aware of the constraints which need to be mitigated and the needs that are likely to be generated by potential residents but until work commences on the joint master planning it is impossible to be more precise about the development.

However, amendments have been made to the main policy and supporting text which provide as much information as is appropriate at this time.

The site is an essential developable site which is important to help the delivery of Ipswich Borough's objectively assessed need (OAN). There are limited deliverable sites within the rest of Ipswich which can deliver a large housing site of a scale which can generate improved infrastructure.

Because it is a large site on the edge of Ipswich, it is necessary to ensure that construction is phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure and to ensure that a sudden over supply of housing does not adversely impact on the Ipswich housing market. The Council recognises the importance of ensuring adequate infrastructure is in place, in terms of social, transport and environmental to ensure that the impact of the development is appropriately mitigated and to meet the needs generated by potential residents. The master-planning approach will need to take account of other policies in the plan but because the allocation is designed to come forward at the latter end of the plan period, it would be foolhardy to joint master plan until nearer the time it can come forward. The Ipswich Garden Suburb site is also located in the north-eastern boundary of the Borough and so it is important that this site is largely completed before work commences on this allocation at Humber Doucy Lane.

The allocation in East Suffolk is in part designed to provide a green buffer to protect the villages in East Suffolk near this allocation as well as to provide 150 dwellings indicatively. The Council recognises the need for a green trail (formerly the 'green rim')

and the Government requirement to enhance biodiversity by 10% and this will be built into the master planning process.

It is too early to consider whether the allocation, together with East Suffolk’s allocation will become a garden suburb in advance of a full assessment of the requirements needed to develop the sites which will be identified through the joint master-planning process. Paragraph 8.25 identifies the fact that the site is sensitive and requires that the allocation will need to ‘deliver high quality design, which sensitively addresses adjacent countryside and existing dwellings.’

The indicative route of Green Corridor D does run through the proposed allocation, but this does not preclude a potential allocation for residential development. The need to incorporate appropriate biodiversity enhancements and the green trail through the site are highlighted in the site sheet.

It is also recognised that mitigation will be required to address transport issues arising from the development and the impact of the development on the existing road network. This will be informed by the 2019 transport modelling work.

Historic England have recommended through the emerging Suffolk Coastal Local Plan examination that their equivalent policy clearly identifies the nearby heritage assets and the need to preserve these. Consequently, similar wording has been incorporated into Ipswich Borough Council’s policy wording and supporting text.

The indicative development capacity (496 dwellings) and site area (23.62ha within IBC land) have been listed in the policy wording and supporting text where appropriate.

A site sheet (ISPA4.1) has been added to the end of the site sheets (Appendix 3A to the Site Allocations Plan) to highlight the area of land in question and the development constraints/ issues that need to be taken into account.

The Habitat Regulations Assessment identified that the site should incorporate on-site Strategic Accessible Natural Green Space (SANGS) and consequently this has been included in the supporting text and on the accompanying site sheet.

Several public notices were erected along Humber Doucy Lane and the surrounding area to notify the public of the proposed allocation. The position of these notices was to inform members of the public in the local vicinity and not to accurately demarcate any boundaries of the proposed ‘broad location’.

15. CS1 – Sustainable Development

Representations	Comments	Object	Support
13	0	13	

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25745	Environment Agency	We are pleased to see the inclusion of Policy CS1 regarding sustainable development. Paragraph 8.20 refers to nationally and internationally protected landscapes and habitats. The wording here should be amended to say that "A particular issue is the need to ensure that new development does not result in harm to individual designated sites or the integrity of the network of locally, nationally and internationally designated sites, namely Local Wildlife Sites, Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and Ramsar sites".
25750	Environment Agency	Paragraph 8.37 refers to outdated climate projections as it refers to UKCP08. UKCP18 has now been released and should be referred to. Further information can be found on the Met Office website here: https://www.metoffice.gov.uk/research/collaboration/ukcp . The Local Plan should ensure that any potential impacts that may arise as a result of applying new climate change allowances are considered.
25752	Environment Agency	Paragraph 8.40 refers to tidal risk being addressed and mentions that there is still a residual risk. The wording should be further enhanced by also referencing any fluvial flood risk from the River Gipping.
25754	Environment Agency	We welcome reference to the local Water Cycle Study (WCS) and the local surface water management plan within paragraph 8.41 of the Local Plan. The WCS will serve as an evidence base to support the local plan and should suggest policies and measures to enable the delivery of all proposed development.
25755	Environment Agency	Therefore, we would expect to see a summary of the findings and recommendations of the WCS and surface water management plan within the local plan. Any areas of concern in terms of waste water and sewerage infrastructure provisions should be highlighted and details of how development will be dealt with sustainably within the Borough provided in accordance with NPPF paragraph 20 section b. It should however be noted that the Haven Gateway Water Cycle Study is now 10 years old, this should be taken into consideration when referring to the WCS.
25756	Environment Agency	If the Water Cycle Study is updated, this should be referred to when the local plan is updated. The paragraph could be enhanced by referencing that development should be phased in line with infrastructure upgrade

		timescales, thus ensuring adequate waste and water infrastructure is in place to accommodate the demands from additional growth in the borough.
25901	Environment Agency	We would like paragraph 8.43 to include some text about the benefits of trees for rivers. Trees are important in helping to keep rivers cool and therefore improving the state of the river for biodiversity. By providing shade, trees are able to moderate the extremes in water temperature which can be detrimental to fish spawning. Their underwater root systems provide valuable habitat to fish and invertebrates whilst stabilising the banks. Shading can also be helpful in the control of aquatic vegetation and well as bringing benefits for people.
25902	Environment Agency	Green spaces and functioning ecosystems are referenced in paragraph 8.44. This paragraph could be enhanced by specifically referring to blue corridors (such as the River Gipping) here too. Blue corridors promote the idea of 'making space for water' and can involve setting back urban development from watercourses, overland flow paths and ponding areas creating a mosaic of urban corridors designed to facilitate natural hydrological processes whilst minimising urban flooding, enhancing biodiversity and improving access to recreation.
26045	Historic England	The supporting text makes no mention of the inherent sustainability of keeping historic buildings in use.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26099	Suffolk Constabulary	The first sentence refers to climate change. It has been estimated that the carbon cost of crime within the UK is in the region of 6,000,000 tonnes of CO2 per annum, roughly equivalent to the total CO2 output of 6 million UK homes. Reducing crime not only improves the quality of the environment for those who live in, work in and visit the borough, but can also have a direct impact on CO2 production. Designing out crime should be given greater emphasis throughout the plan. For example, the second paragraph of this opening Policy could be amended.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25786	Home Builders Federation	When the NPPF was first published Councils were advised by the Planning Inspectorate to include some 'model' wording in local plans with regards to the presumption in favour of sustainable development. However, it is our understanding that this advice has since been rescinded and that such statements are no longer a requirement of local plans. Given this position and the fact that S1 repeats national policy it should be deleted.
25898	Montagu Evans on behalf of SSE Generation Development Ltd	Policy CS1 is in favour of Sustainable Development and this is supported. SSE is of the view that wind energy will continue to contribute significantly towards efforts to reduce carbon emissions and help tackle climate change. It is considered that the Local plan should give further focus to wind energy and the benefits it can bring. Furthermore, an evidence based and site-specific approach should be taken to further wind energy developments rather than a reliance on landscape capacity studies. Consideration should be given not just to landscape but also the information contained within an EIA and supporting planning documentation.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26143	Private individual	The Climate Change Committee (CCC) states from 2025 at the latest, no new homes should be connected to the gas grid. The Plan should show that this is the intention and the date which this will happen. The general proposals by the CCC should be included (see references). Similar to national targets, local targets between authorities and universities should be set on climate change. What discussions have IBC had?

The following made no comments in response to this issue.

Parish and Town Councils

How these comments have been taken into account in the Final Draft Local Plan:

The Planning Practice Guidance states: 'Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking.' PPG, paragraph: 001 Reference ID: 6-001-20140306. CS1 sets the context for the Plan's approach to tackling climate change and therefore the policy remains relevant. The Planning Practice Guidance states that, 'Paragraph 11 of the National Planning Policy Framework indicates that Local Plans should reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. However, there is no need for a plan to directly replicate the wording in paragraph 11 in a policy. (Paragraph: 036 Reference ID: 61-036-20190723, updated July 2019). As the advice in the PPG changed in July 2019, it is appropriate to reduce the element of CS1 that relates to the presumption in favour of sustainable development.

Policy CS1 reflects the presumption in favour of sustainable development from the NPPF and focuses on the framework set out within the plan for tackling climate change (in accordance with the Climate Change Act 2008, and national planning policy and guidance), as this is a significant threat to society, and central Ipswich is low-lying and subject to flood risk. Designing out crime is one among many important strands of sustainability, therefore, it would be inappropriate to single it out in this policy. However, wording has been added to the supporting text of policy CS2 to cross refer to the design policy DM12 which addresses designing out crime.

Additional wording has been inserted to ensure that the plan is based on, and refers to, the most up to date evidence, and to ensure adequate waste and water infrastructure is in place to accommodate the demands from additional growth in the borough.

IBC is commissioning an update to the Strategic Flood Risk Assessment and this will update the position on flood risk arising from the River Gipping.

Text has been added to 8.41 to outline briefly the findings of the Ipswich Surface Water Management Plan, for completeness. The results of the cross-boundary Water Cycle Study (January 2019) have replaced previous comments regarding the Haven Gateway Water Cycle Study Stage 1 Report.

A new paragraph has been inserted regarding the Ipswich Surface Water Management Plan and the action plan.

Para 8.20 relates to policy ISPA2 which is the overarching strategic policy. Policy CS4 and its explanatory text pick up the different levels of protection afforded to different levels of designated wildlife site.

In November 2018, the Met Office published updated climate change projections (the previous projections being UKCP09). The Met Office web site states that, 'The headline results in the latest set of climate projections are broadly consistent with UKCP09, although there are some differences (e.g. temperature and rainfall) that may

be important for climate risk assessments.’ The Local Plan should refer to the most up to date projections, for accuracy.

A new paragraph on the importance of trees and their role in managing river climate and biodiversity has been inserted as requested by the Environment Agency. Also added is a reference to blue corridors to recognise their importance for supporting climate change resilience and other plan objectives.

A sentence relating to the sustainable benefits of keeping historic buildings in use has been included to address the concern raised by Historic England.

Policy DM1 addresses water and energy efficiency in new buildings and DM2 addresses renewable energy, and therefore these more detailed approaches do not need to be duplicated in strategic policy CS1.

16. CS2 – The Location and Nature of Development

Representations	Comments	Object	Support
21	0	18	3

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25837	Tuddenham St Martin Parish Council	The Parish Council have concerns, and object to, the inclusion of 'a broad location' at Humber Doucy Lane and Tuddenham Road. The documents state that this Local Plan sets out the strategy for future development of Ipswich to 2036 but insufficient information is provided about what is proposed at this location. The Parish Council are disappointed that only vague details for this location are included and this site has not previously been included for consultation. It has been difficult to obtain information about the allocation. This development would result in the physical separation being further diminished between Ipswich and villages.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25903	Environment Agency	We are pleased to see the inclusion of policy CS2 - The Location and Nature of

		Development. Point (g) of the policy should be strengthened include reference to blue corridors to state "dispersing open space based (non-commercial) leisure uses throughout the town with preferred linkages to ecological networks and/or green and blue corridors and protecting the countryside from inappropriate development".
26046	Historic England	The section on densities needs to be clarified. As stated above, high density does not necessarily mean high rise. What does high density mean for the town centre, Portman Quarter and Waterfront? The sentence could also with being broken down into smaller sentences because, as currently constructed, it could be read that the low density elsewhere is so that it does not compromise the heritage assets and the historic character of Ipswich but that this caveat does not apply in the town centre, Portman Quarter, Waterfront and IP-One area.
25703	Suffolk Chamber of Commerce	Suffolk Chamber supports the continued development of the Waterfront as a significant cultural and leisure hub and economic driver in the town. We support the Council's wish to regenerate and provide sustainable growth in this area alongside the Portman Quarter. Likewise, we support the development of the town's retail offer but welcome the focus on new office, hotel, culture and leisure developments in and around the town. As a caveat however, we would like to see further research on hotel use to ensure any new hotels will be occupied and not sat surplus to demand.
25971	Babergh Mid Suffolk District Council	Full opportunity and capacity to meet identified housing land needs should be explored. An amendment should be made to policy CS2 to acknowledge that local planning authorities within the Ipswich housing market area will plan to meet the needs of their own areas. The Babergh and Mid Suffolk Joint Local Plan housing numbers will be identified upon the publication of the national housing price affordability data schedule for March 2019. This will have consequential effects upon any Ipswich DPD document which refer to either Babergh or Mid Suffolk housing numbers.

26068	Suffolk Coastal and Waveney District Councils	<p>Support principles of policy which contributes towards each authority meeting housing needs within their area. The SCDC Plan Infrastructure Delivery Framework provides detail of the infrastructure to support development and policy (SCLP3.5) also supports this. Similar detail relating to infrastructure could be included in the Ipswich Plan, reflecting the Annex to the SOCG. For consistency with DM11, policy for development at the northern end of Humber Doucy Lane should reference the maintenance of separation between Ipswich and surrounding settlements.</p> <p>From 1st April 2019 the new East Suffolk Council will be created, and references to SCDC in the Plan should be updated.</p>
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26133	Ipswich and East Suffolk Clinical Commissioning Group	<p>NHS England and the CCG would welcome further discussions with the Local Authorities with regard to density of development and cumulative growth over the plan period within specific areas, to understand the impact and how this may be mitigated.</p> <p>When identifying potential land for development, consideration should be given to the role open space plays to the development of healthy communities and preventative care.</p>
25784	Ipswich Faith and Community Forum	<p>We strongly urge Ipswich Borough Council to pursue policies that allow the development of community facilities that are easily accessible by all.</p>
25788	Ipswich Faith and Community Forum	<p>Community buildings near the town centre must be easily accessible for members of the community. For example, the Sikh community have a temple and community centre on Bramford Road, but this site is not easily accessible via public transport which hinders those without a car. The Town Hall, many churches, several mosques, the Buddhist centre are located within easy access of the town centre and a number of other communities regularly meet in or around the town centre at colleges & the university. To</p>

		strengthen links/and understanding between different community groups, town centre infrastructure must take into account community cohesion.
26100	Suffolk Constabulary	To highlight the importance of designing out crime would be beneficial in this policy to ensure that careful consideration is made prior to locating new housing too close to other land uses such as retail or recreational facilities

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25932	Ashfield Land Limited	We support the recognition that the Council should work with neighbouring authorities to address housing need within the Ipswich Housing Market Area. The Preferred Options accepts that there will be a need for future development beyond the Ipswich administrative boundary. There should be a particular focus on delivering this growth in those areas located around the Ipswich fringe, including appropriate sites in Mid Suffolk. This is logical given the direct/functional relationship between such areas and the Ipswich urban area.
26079	Mersea Homes Ltd	Consistent with draft Policy ISPA4, CS2 should recognise the potential need for Ipswich to meet its housing need beyond its boundary. Whilst new clause (b) provides an appreciation of cross-boundary working in relation to prospective development at Humber Doucy Lane, it is certain that cross-boundary working will become increasingly important to meeting Ipswich's housing need. A further clear statement of commitment is therefore required under CS2 allied to a stronger commitment under the draft Statement of Common Ground on Strategic Cross Boundary Planning Matters.
25689	Boyer on behalf of East of England Co-Operative Society	Criterion d of Policy CS2 is supported.
25914	Turley on behalf of Pigeon	The policy sets out that the central urban focus to the location of development also reflects the

	Investment Management Ltd	<p>sequential approach to site selection required by the NPPF. However, Pigeon seriously dispute the Council's ability to deliver housing on many of the brownfield sites.</p> <p>Housing opportunities are limited and need to consider sites beyond the boundary. No further evidence as to how housing will be delivered later in the plan period.</p> <p>IBC should look to sustainable locations which have good infrastructure, high accessibility to settlements with employment opportunities and connectivity to Ipswich. E.G. neighbouring satellite villages and Felixstowe and A12 growth corridors.</p>
26054	Barton Willmore on behalf of Telereal Trillium Ltd	<p>Support part of policy which focuses residential development within walking distance of the town centre.</p> <p>Question the term 'medium' densities with respect to development in the rest of IP-One to maximise previously developed land. The Bibb Way Site (IP279) has been allocated for 104 dwellings across the entire site which only represents 40% of the site area. This is not maximise the use of previously developed land contrary to NPPF paragraph 123. A higher density with a mixture of houses and flats should be sought.</p>
25818	Cardinal Lofts (Mill) Ltd	<p>The Company offers its general support for the spatial strategy, as set out at paragraphs 6.10 to 6.22 and, in particular, the objective of focusing development in central Ipswich to tackle issues of deprivation and social exclusion.</p>
25819	Cardinal Lofts (Mill) Ltd	<p>Policy's main principles are supported. In particular, the Company again notes the focus that is being placed upon the IP-One Area, where high density development will be the norm.</p> <p>There is a potential conflict between criterion h of the policy and the 'objectives' (as set out at paragraph 6.8) and Policy DM12. The former (criterion h) requires that new development demonstrates 'very high quality architectural and urban design', whilst the latter (the 'objectives' and Policy DM12) both require a 'high standard' of design. The latter is considered to be more consistent with the guidance set out in the NPPF.</p>

25565	Kesgrave Covenant	We partially support this policy as it is currently drafted. We support the inclusion of land within our client's control at the northern end of Humber Doucy Lane. Please also see objection comment on this policy.
25566	Kesgrave Covenant	We partially object to this policy as it is currently drafted. We support the inclusion of land within our client's control at the northern end of Humber Doucy Lane, however we submit that this land should be an allocation rather than a broad location and the plan should be worded to provide flexibility for the site to come forward earlier in the Plan period. This objection should be considered in the context of the Council's inability to meet their housing requirements in the early years of the Plan period (as set out in our response to Policy CS7).

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25626	Private individual	Support the theory of mixed uses, but I would expect there to be more work on the demand of such sites to show that businesses actually want these spaces. E.g. Duke Street and Stoke Quay have several empty units a number of years after completion. I don't think Stoke Quay has a single retail unit in use! If there is no demand for such uses then the ground floors would be better used as parking.
25910	Private individual	The 3,485 homes suggested for CS10, more if Humber Doucy Lane (CS2) are included will create the following issues: <ul style="list-style-type: none"> - Significant increase in car movements around Ipswich, especially to the north. The current road layout is entirely unsuitable for any significant increase; - A northern by-pass would be far less useful than an additional ring-road situated as close to the north of Ipswich; - Adverse effect on air pollution; - Harm to the landscape and environment; - Loss of agricultural land; - No capacity for schools, libraries and health centre; and

		- Under provision of green space, parks and recreation
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How these comments have been taken into account in the Final Draft Local Plan:

CS2 sets out the spatial strategy for the town. The plan provides for development to meet Ipswich's needs with the only cross-boundary development site identified at Humber Doucy Lane. The provisions of ISPA4 and the Statement of Common Ground would deal with any cross-boundary windfall sites.

Ipswich has a challenging land supply situation, because of the tight borough boundary. National policy requires that housing need be met and, to do that, the Borough Council needs to consider all remaining land within Ipswich. This has been undertaken through the Strategic Housing and Economic Land Availability Report (SHELAA). It would not be reasonable to expect neighbouring areas to meet Ipswich's need while suitable development opportunities remain available within the Borough. Policy ISPA4 specifies that, at Humber Doucy Lane, new homes would be limited to land south of the railway line, thereby maintaining the separation of Tuddenham from Ipswich. The railway line would form a defensible boundary to development on the ground. The Preferred Options Stage was the first draft of the Ipswich Local Plan Review and therefore the first opportunity to consult about this area of land. There is sufficient certainty at this stage in plan preparation to allocate sites which make up the Humber Doucy Lane 'broad location' and therefore this change is proposed to add clarity.

The infrastructure requirements associated with the allocation at Humber Doucy Lane are considerable and include transport measures, education capacity and the green trail (formerly the green rim). Some infrastructure items are closely linked to provision within the Red House neighbourhood at the Ipswich Garden Suburb. In addition, the area would involve both on-site and off-site junction improvements which would form part of the master planning process.

The development issues associated with the Ipswich Garden Suburb have already been considered through the adopted Local Plan allocation CS10, and subsequent planning applications for two of the parcels, Henley Gate and Fonnereau. Any more recent evidence, such as the Water Cycle Study or traffic modelling, has taken the allocation into account. The Highway Authority is currently working on the Ipswich Northern Routes and consultation for the Northern Routes concluded in September 2019. The impacts of development at Humber Doucy Lane have been considered through the sustainability appraisal process and ongoing evidence base work including traffic modelling and air quality modelling. The Plan will include measures needed to mitigate impacts. Social and physical infrastructure needed such as schools and healthcare provision is identified through Tables 8A and 8B of the plan.

The final paragraph of policy CS2 has been amended for clarity. The explanatory text (paragraph 8.47) cross refers to the density policy DM23 which explains what high, medium and low densities mean in relation to dwellings per unit area.

The aim of the mixed-use requirement is to create sustainable, multi-functional neighbourhoods to enhance vitality and viability. Part of this is about creating 'active frontages' at street level, which car parking would not achieve. The development also needs to be safe for people within a flood risk area, which affects the types of

development which may be suitable at ground level. The policy itself is not prescriptive about the type or proportion of mixed uses and therefore represents a flexible approach. An additional element of flexibility is proposed regarding mixed uses where neighbouring buildings already deliver diverse uses.

Clause h. of the policy already requires good design. However, safety and security are an essential element of people’s quality of life. Therefore, clause h has been amended to refer to security and safety and amendments to the supporting text will connect the strategic statement made through policy CS2 to the detailed policy DM12 which addresses Designing out Crime.

Clause h. of the policy has been amended for consistency with NPPF paragraph 124 which refers to good design, and policy DM12 which refers to development being well designed.

To ensure the river corridor is recognised as part of the wildlife and recreational corridor networks, clause g has been amended.

The Council has fully explored land availability through the Strategic Housing and Economic Land Availability Assessment. Paragraph 8.11 of the plan already commits to each LPA meeting its own housing need as a starting point. Policy ISPA4 provides for cross boundary working on housing delivery.

No change is proposed to the approach to housing density, which is supported by the whole plan viability assessment. Policy DM23 sets out the detailed approach to density, which has been implemented effectively through the adopted Local Plan. Indicative capacities against sites are not fixed and higher capacities can be sought where the site characteristics may justify it. Strategic policy CS16 protects open space and CS17 addresses infrastructure. Therefore, changes are not proposed to CS2 to address these matters.

The Retail and Leisure Study identifies a need for additional hotel beds over the plan period. The NPPF paragraph 85 d) requires local plans to allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.

The policy, through clause a., already focuses community facilities into the most accessible locations. Therefore, applications for such facilities would be determined in accordance with this.

Whilst brownfield delivery is challenging in Ipswich because of values and costs, it can be achieved. This is demonstrated by completions on brownfield land (which have exceeded 70% of all residential completions in each of the last five years) and progress on stalled sites such as Regatta Quay/the Winerack.

17. CS3 – IP-One Area Action Plan

Representations	Comments	Object	Support
4	0	4	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26047	Historic England	Clarity needed within this policy, the Core Strategy and the IP-One section of the Site Allocations Plan of what is the status of the opportunity areas. Paragraph 6.1 of the Site Allocation document sets out - the Opportunity Areas set out development principles for that specific area, which is positive. However, these are not set out in policies, although some areas do have policies within the IP-One section of the document and, again, individual allocation policies take precedence. This doesn't give a consistent vision with clarity for a developer or the ability for the Council to help meet aspirations.
25705	Suffolk Chamber of Commerce	We welcome the improvements to the IP1 area including more trees and planted areas, however, we must stress the importance of continuing to improve the area around Ipswich Train Station as to ensure a welcoming area to the town for visitors and workers prior to entering IP1.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25879	Associated British Ports	ABP wish to ensure that the Port's 'significant (economic) role' and ability to expand further and assist in driving growth in the region is protected. ABP requests that recognition is made in CS3 and its accompanying text to the Port and to other important existing employment and other activities within and adjoining the IP-One area. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses. We suggest the addition of a new criterion into any new policy based on Policy CS3 (see full representation).

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26055	Barton Willmore on behalf of Telereal Trillium Ltd	Supportive of this policy and encourages IBC through its development of the IP-One Area Action Plan to increase the density at the Site to reflect its deliverability and its contribution towards IBC meeting its housing requirements, including accommodating the additional 20% buffer. A specific allocation for site IP279 should be made as part of the IP-One Area Action Plan.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Ipswich Port is already referenced at various points within the Local Plan. As the Port lies primarily outside the IP-One area, text has been added to policy CS13 Planning for Jobs Growth, rather than to CS3 IP-One Area Action Plan. The amenity policy DM18 also delivers the protection that ABP wish to see of existing operations from potentially conflicting new development.

To clarify the status of the Opportunity Area development principles, amendments to the policy have been made. They are identified through policy CS3 IP-One Area Action Plan clause c and Site Allocations Plan policy SP2.

Opportunity Area F ‘River and Princes Street Corridor’ of the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document already identifies the need to improve the urban form and public realm on the key route from the station to the town centre.

Site IP279 Land at the Former British Telecom Office, Bibb Way, is already allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document, Policy SP2. The site has been sub-divided in three parts to reflect the land that is and is not subject to the recent grant of prior approval.

A new policy SP4 has been introduced in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document. A separate assessment of this has been provided. The policy introduces ‘Opportunity Sites’ within IP-One that have potential for housing-led redevelopment and would contribute to the regeneration of the Waterfront and Town Centre. The Council will work with land owners and other interested parties to investigate opportunities and bring them forward through the development management process, taking into account constraints set out in the Appendix 4 site sheets.

A new Opportunity Area ‘H’ for the Holywells area has been introduced to help provide a coordinated masterplan approach for the development of the key sites in this area.

18. CS4 – Protecting Our Assets

Representations	Comments	Object	Support
20		20	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25904	Environment Agency	Policy CS4 - Protecting our Assets outlines how the council will conserve and promote the enjoyment of the historic environment. We would suggest that another point is added to this policy saying that "Preventing the spread on non-native invasive species by ensuring that an appropriate biosecurity protocol is adopted".
25905	Environment Agency	Policy CS4 - Protecting our Assets outlines how the council will conserve and promote the enjoyment of the historic environment. Point (a) should be strengthened by changing the wording of this to read "Applying full protection to international, national and local designated sites and protected and priority species".
25906	Environment Agency	Policy CS4 - Protecting our Assets outlines how the council will conserve and promote the enjoyment of the historic environment. Point (c) should also be strengthened by amending its wording to "Preventing the loss of ancient woodland and ancient or veteran trees in accordance with national policy and requiring new development to plant the veteran trees of the future using appropriate native species of local provenance".
25907	Environment Agency	Policy CS4 - Protecting our Assets outlines how the council will conserve and promote the enjoyment of the historic environment. paragraph 8.75 should also be amended accordingly to state that "Ancient and semi-natural woodlands and veteran trees are irreplaceable habitats of high biodiversity value and must be protected from development that would result in damage to or loss of any of these features".
25909	Environment Agency	Policy CS4 - Protecting our Assets outlines how the council will conserve and promote the enjoyment of the historic environment. point (d) should be further strengthened by

		amending the wording to "Supporting and securely funding the Greenways Project".
25911	Environment Agency	It is welcoming to see reference to the Water Framework Directive (WFD) in paragraph 8.71 however, detail is sparse. To improve the wording of this paragraph the Local Plan should identify the two key objectives of WFD: no deterioration of waterbodies and ultimately improving all waterbodies to good status by 2027. These objectives are key requirements of WFD. This could be further enhanced if the Local Plan included WFD baseline information on the local River Basin Management Plan (RBMP), specifically relating to the status of WFD waterbodies surrounding Ipswich Borough.
25913	Environment Agency	Water Framework Directive (WFD) in paragraph 8.71, it would be useful to highlight the number of waterbodies within the borough failing WFD 'ecological status or potential' and 'chemical status'. It is important to note that no development, either individually or cumulatively can cause deterioration in WFD status. All development should seek to enhance water quality reaching waterbodies in Ipswich by use of appropriate SuDS techniques that include pollution prevention and control measures.
26048	Historic England	In para 8.62 we would expect to see the term 'built, historic and natural assets' to be consistent. We welcome the commitment to a local list in the policy but would suggest that it is turned round '...the maintenance of a list of heritage assets of local importance, such as buildings or parks,....' to make it clear that it is not just buildings that can be included on the list. This should also be supported through the supporting text. Agree that the area between the Central and Wet Dock Conservation Areas should be reappraised and new boundaries considered.
25574	Marine Management Organisation	References to the "East Marine Plan" should be re-focused towards the "South East Marine Plan" or the UK Marine Policy Statement. The East Marine Plan should only be used in the context of cross-boundary effects of marine planning. Recommended changes to the reasoned justification paragraphs of this policy on pages

		41 (8.70) and 42 (8.73) based on the above. See scanned representation for full details of proposed re-wording.
25751	Natural England	We welcome an ecological network approach to connect fragmented wildlife habitat, including designated sites. We agree that there are opportunities in development to conserve and enhance biodiversity through net gain. We advise that biodiversity net gain is incorporated into to Policy CS4 to enable delivery through development. This requirement should be proportionate to the size of the development and not limited to large applications. It is recommended that policy is founded on an evidence base that includes mapping assets and identifying areas for creation (incorporated in GI strategy and SPD's).
25753	Natural England	The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.
25706	Suffolk Chamber of Commerce	We believe that much could be done to make more of the historic assets of Ipswich, which are not exploited for tourism and educational purposes. More could be made for example through improved displays at Christchurch Mansion, Ipswich's Anglo-Saxon Heritage and associated archaeology, the industrial past and Wolsey's Gate. Moreover, any new development as noted in the plan should contribute positively to the quality of the built and natural environment within Ipswich and local heritage.
26008	Suffolk County Council	Paragraph 8.71 refers to Anglian River Basin Management Plan and the WFD. To implement these, shallow open landscaped SuDS will be needed. These will impact on the

		<p>design and master planning of sites as they often take up more space than envisaged. Requirements will need to be considered early in application preparation.</p> <p>Foxhall HWRC is within Suffolk Coastal. It is at capacity and development will add pressure. Plan to redevelop.</p> <p>Portman's Walk HWRC not capable of expansion/ remodelling. County project commenced to identify a new site.</p> <p>Support waste minimisation in this and other related policies. Could include "bring sites" as requirement.</p>
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25796	AONB	Amend bullet point (h) of policy CS4 to read Conserving and enhancing the Natural Beauty and Special Qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and requiring development to respond to local landscape sensitivity.
25797	AONB	Amend line 1 of para 8.73 to read The Stour and Orwell Estuary Special Protection Area is protected under the Birds directive.
25774	RSPB	Support the commitment to conserve and enhance natural assets. Consistent with national policy. 8.65 - Add EU Birds Directive. 8.72 - Add 'integrated' before bird boxes which is relevant to new dwellings and other buildings. Integrated nest boxes require no ongoing maintenance and blend seamlessly within the design of a building. Traditional boxes will require maintenance and repair and are not favoured architecturally. Research (action for swifts) indicates that public perception of integrated boxes is very favourable.
26101	Suffolk Constabulary	To highlight the importance of designing out crime, it would be beneficial to clarify the need to consider security when conserving and enhancing heritage assets and ensuring that

		they are not left unoccupied and at risk of crime.
25617	Suffolk Wildlife Trust	We support the intention of this policy to protect the Borough's biodiversity, trees and soils. We recommend that paragraph 8.65 should include reference to the Conservation of Habitats and Species Regulations (2017). Also policy CS4 states that there are 20 County Wildlife Sites in the Borough, however paragraph 9.8.3 states that there are 19. This should be checked for consistency.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26056	Barton Willmore on behalf of Telereal Trillium Ltd	Telereal recognises that the Site is adjacent to two Local Nature Reserves (Alderman Canal west to the south and Alderman Canal East to the south-west). Telereal is committed to enhancing these two Local Nature Reserves, where possible, when developing the Site for residential development but the designations themselves can be deemed as a potential impediment to wider residential redevelopment of the Site.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

Rep. ID. No.	Respondent	Summary
25976	Private individual	Greenways should be given greater support.

How these comments have been taken into account in the Final Draft Local Plan:

It is proposed to amend clause 3 and paragraph 8.52 of policy CS4. The change is in response to comments from Historic England, who have asked the Council to clarify that it is not only buildings that can be included on the Local List but all heritage assets.

The wording of this policy has not been amended to include an explicit requirement for biodiversity net gain wherever possible. The Council is supportive of seeking biodiversity net gain in accordance with the provisions of the NPPF.

The Council is committed to reducing anti-social behaviour and crime and acknowledge that the planning system can play an important role in ensuring appropriate measures are in place in relation to crime prevention and security. However, it is considered that the explicit requirement is best served through policy DM12.

The Marine Management Organisation have advised that references to the East Suffolk Marine Plan should be refocused towards the 'South East Marine Plan' and that the East Marine Plan should be used in the context of cross boundary effects of marine planning.

New policy text added to help prevent the spread of non-native species, an increasingly important issues and pertinent to Ipswich which has areas of Japanese Knot Weed.

The newly revised National Planning Policy Framework gives ancient and veteran trees greater protection. Policy CS4 has been amended to ensure the policy reflects national policy.

The Water Framework Directive (WFD) is an important mechanism for assessing and managing the water environment in the EU. The Local Plan should identify the key objectives of this important document. It is considered that the ecological status to water bodies is best highlighted through policy DM8

The Council is proud of Ipswich's historic and natural environment and is keen to safeguard it in line with national policy. The policy wording has been strengthened to afford greater protection to both the historic and natural environment in accordance with comments from the Environment Agency.

The Council is committed to the Greenways Project, which makes an important contribution to delivery improvements to the natural environment.

Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development. The policy has been updated to take account of biodiversity net gain, which has been mandated by government. To achieve biodiversity net gain, the recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development.

There are 20 County Wildlife Sites in Ipswich not 19.

The EU Birds Directive and Conservation of Habitats and Species Regulations 2017, as amended was missed from the list of legislation, policy documents and circulars in paragraph 8.40. Reference to the EU Bird Directive and Habitats and Species Regulations 2017 has now been added for completeness.

The RSBP have asked the Council to require provision of 'integrated nest boxes', rather than 'nest boxes'. Integrated nest boxes require no ongoing maintenance and repair and are preferable to other nest boxes. The Council are keen to protect the natural environment and the change reflects this commitment.

Natural beauty and special qualities’ afford greater protection to the AONB in accordance with legislation.

Legislative correction. The Stour and Orwell Estuary is protected under the Birds Directive.

The Council are proud of the town’s historic environment, but it is agreed these could be used as an enabler to development and tourism. See policy DM13 which considers how Ipswich’s heritage can be utilised as a catalyst for regeneration.

Clause b and the supporting text to the policy have been amended to reflect the findings of the HRA to reflect the need to include biodiversity net gain improvements through development.

The Council is committed to the Greenways Project, which makes an important contribution to delivering improvements to the natural environment. Clause d of the policy has been amended to demonstrate this commitment.

In line with the National Planning Policy Framework the Plan seeks to protect high quality agricultural land where possible. Whilst in some cases meeting wider objectives will necessitate the loss of agricultural land, the policy seeks to ensure that loss of agricultural land is a consideration and that soil quality is protected and enhanced.

19. CS5 – Improving Accessibility

Representations	Comments	Object	Support
8	0	7	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25708	Suffolk Chamber of Commerce	Approve of the aim of this policy. Support the introduction of innovative transport and parking solutions to tackle congestion, as well as a simpler and cost-effective park and ride scheme, better bus services, more electric vehicle charging points and cycle route improvements. Support proposals that create better links between the retail centre and both the railway station and the waterfront. There is an urgent need for the provision of a taxi-rank on the Waterfront. We would like to see the case for this made in the Local Plan. We hope the Council continues to back our A14 campaign.

25990	Suffolk County Council	Joint Suffolk Health and Wellbeing Strategy - Outcome 2: Improving independent life for people with physical and learning disabilities: The Plan could set out a stronger framework for consideration of the accessibility of the built environment. Policy CS5 refers to accessibility in respect of transport but does not directly refer to the varying needs of the population as a whole apart from in supporting text (Paragraph 8.88). The Borough Council should consider moving this requirement into policy - to complement what is in DM12.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25785	Ipswich Faith and Community Forum	We endorse the green objectives set out in section 8.85. We particularly support the increased availability of public transport.
25661	Northern Fringe Protection Group	<p>IBC is failing to improve access in Ipswich in breach of Policy CS5. More needs to be done otherwise the modal switch assumptions used in the traffic modelling are too high and unsound.</p> <p>During the duration of the current Local Plan and despite the agreement of the Cycling SPD, we have seen no improvements to the cycle network. All that has happened is the removal of the cycle lane of Felixstowe Road and the Cornhill works which have blocked a cycle route.</p> <p>Evidence of improvements since the cycling SPD was adopted should be provided.</p>
26102	Suffolk Constabulary	To highlight the importance of designing out crime it would be beneficial to further define safe walking and cycling to include segregation cycle/pedestrian routes. Also, to ensure that secure parking and cycle storage means adherence to the relevant SBD standards (including Park Mark for all car parks)

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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26057	Barton Willmore on behalf of Telereal Trillium Ltd	number of community and leisure facilities. The nearest supermarket to the Site is Aldi, which is located approximately 225m to the west of the Site. The nearest Primary School and GP Surgery are located in easy walking distance from the Site (400m). Site also benefits from its location to sustainable modes of transport. Site should accommodate a greater density given its location.
25820	Cardinal Lofts (Mill) Ltd	The company generally welcomes, and supports, initiatives that are designed to minimise the need to travel and promote foot, bicycle and public transport travel modes. It also welcomes the recognition that some journeys will need to be made by car, although it is disappointed that only the Town Centre is specifically mentioned as being a location, the vitality and viable of which, depends upon access by a variety of transport modes. the Company is of the view that this needs to be expanded to include the whole of the IP-One Area.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25627	Private individual	Support this policy but nothing to demonstrate how it can be implemented.

The following made no comments in response to this issue.

Parish and Town Councils

How these comments have been taken into account in the Final Draft Local Plan:

The Council agrees that a stronger statement in relation to the access of the built environment would be helpful in this policy. The 2011 Census provides data that compares rates of disability in the Ipswich population with the eastern region and England. It shows that the proportion of people whose day to day activities are limited ‘a little’ or ‘a lot’ is higher for Ipswich than the comparator areas in almost every age group. Policy DM12 addresses the issue, but the strategic policies of the plan do not explicitly do so and, therefore, the policy and supporting text have been amended for completeness and consistency.

The Council has an aspiration to make Ipswich a dementia-friendly town. Evidence has shown that good quality housing and well-planned, enabling local environments can have a substantial impact on the quality of life of someone living with dementia,

helping them to live well for longer.’ Therefore, it is important that the Local Plan provides the framework to create inclusive and dementia-friendly environments.

Joint work is being undertaken across the Ipswich Strategic Planning Area to identify specific measures needed to achieve modal shift. Suffolk County Council has prepared a Transport Mitigation Strategy for the ISPA area and is preparing a Local Cycling and Walking Infrastructure Plan’ (LCWIP), which will take forward improvements identified through the Ipswich Cycling Strategy SPD. It is also reviewing the Local Transport Plan (LTP) and preparing a detailed Ipswich Transport Strategy, which will sit below the more strategic LTP document. The Ipswich Transport Strategy would set out any detailed works such as junction improvements that may flow from the LCWIP.

Through the detailed development management policies set out in Part C of the Plan, the Council creates a framework for ensuring that new developments are accessible and modal shift is encouraged. An example of policy implementation is the residential development currently taking place at the former Europa Way Business Park, which has a travel planning condition attached.

However, additional explanatory text has been added for clarity about how the policy will be implemented and how it links to other parts of the Local Plan.

Vitality and viability are explicitly mentioned in the context of the town centre based on the National Planning Policy Framework; this focuses on the vitality and viability of town centres because of the role they play at the heart of the community.

The policy already refers to safe access to developments. However, paragraph 8.85 refers to attractive cycle routes but does not explicitly mention safety and, therefore, it has been amended. Policy DM22 deals with car and cycle parking and refers to the Suffolk Parking Guidance which provides detailed advice on safe design. The detailed design of cycle routes and whether safety in this context means segregation between modes would be more appropriately addressed through a more detailed document such as the Suffolk County Council Walking and Cycling Infrastructure Plan than the Local Plan.

The location of taxi ranks would more appropriately be progressed outside the remit of the Local Plan, as the designation process falls under other regulatory regimes and work is ongoing out with the Local Plan process to explore the need for a taxi rank at the Waterfront.

Comments relating to specific sites are dealt with through the relevant site allocation policy (SP2) of the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document.

20. CS6 – The Ipswich Policy Area

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

**Developers and Landowners
Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

This is a deleted policy.

21. CS7 – The Amount of Housing Required

Representations	Comments	Object	Support
15	0	13	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25589	Department for Education (DfE)	The DfE notes that significant growth in housing stock is expected in the borough; draft policy CS7 confirms a housing target of at least 8,622 homes for the period 2018 - 2036, equating to an annual target of at least 479 dwellings. This will place significant additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements
25712	Suffolk Chamber of Commerce	We are pleased with the Council's aim of delivering at least 8,622 dwellings and we hope the appropriate provision will be given for a mix of housing, including high-quality family housing and housing for people on lower incomes.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25662	Northern Fringe Protection Group	The CS should comply with Government advice to use the Standard method annual 2014 (445) figures (Government October 2018 consultation) for housing targets. The evidence base ignores latest population and employment figures. It fails to consider potential impacts for the Core Strategy of the drop of employed people from 67,300 to

		66,500 in the latest NOMIS figures. The CS gives misleading impressions of continued population growth, when it is currently stagnant. The evidence base needs to consider the impacts of the latest population figure of 138,500 (2017) is the same as 2016, as the fall-off in population growth has implications.
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25933	Ashfield Land Limited	It would be perverse if the Local Plan was to be revised to use the lower 2014-based projects as these are below the 2016-based projections and would be inconsistent with the Government's central objective of boosting housing delivery. The standard method should be seen as a minimum/ starting point only and a higher level of growth should be planned for to support the role of Ipswich in the wider sub-region.
25736	Constable Homes Limited	This policy approach is supported.
25787	Home Builders Federation	We would agree with the Council's assessment of housing need of 479 dwellings per annum. However, this is the starting point for assessing needs and national policy/ guidance expect Councils to consider whether other factors will necessitate a higher requirement. Given that the level of affordable housing needs within Ipswich that will not be met the Council need to consider whether additional sites could be allocated that would make a further contribution to meeting these needs. It will also be important to raise this with neighbouring authorities to consider whether it is possible to allocate additional sites near Ipswich.
25789	Home Builders Federation	The Council has adopted a stepped housing trajectory. However, the lack of a five-year housing land supply (on adoption) is not a relevant justification. Paragraph 3-034 of PPG indicates two circumstances where a stepped trajectory may be appropriate. Whilst it appears the Council can satisfy one of these

		tests (strategic sites and late delivery) we suggest that the step as set out does not reflect expected delivery. We recommend that whilst a requirement in the first two years of 350 dpa is acceptable this should increase to 400 homes between 2020/21 and 2022/23. At 2023/24 this should then increase to 550.
25643	Turnberry Consulting on behalf of Grainger PLC	(Read alongside table 2 of representation). Whilst we acknowledge that a figure of 9,214 is ambitious and commend the Council for setting such targets, the figure only represents a buffer of 6.8% above the standard methodology. We caution the conservative buffer the Borough has applied to the provision of housing over the Plan period, particularly given the Council's own margin for "slippage" was 10% (applied to Table 2 within the Core Strategy document). Therefore, logically, an uplift of at least 10% should be applied to figures H and G in Table 2 of this representation.
25644	Turnberry Consulting on behalf of Grainger PLC	We caution the Council's spatial strategy, where over 50% of new housing allocations will be delivered through a single site (Ipswich Garden Suburb). This has already limited the Council's ability to provide its five year housing land supply (discussed in detail in the other representations) but could also jeopardise the delivery of the Plan should the site be rendered undeliverable or not as fruitful for unforeseen reasons.
25645	Turnberry Consulting on behalf of Grainger PLC	In relation to the allowance of windfall sites, paragraph 70 of the NPPF states "where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply". In this case there is a lack of compelling evidence to support windfall sites as a reliable source of supply. Based on this. the plan does not comply with paragraph 70 of the NPPF and further evidence in support of the windfall sites should be provided, or housing provision over the plan period should be reviewed.
25646	Turnberry Consulting on behalf of Grainger PLC	Ipswich has experienced under-delivery against their housing targets over the last three years, ranging between 55-64% (based on the 2017 AMR) (refer to table 3 of this representation). Consequently, the Plan

		<p>should be allowing a 20% buffer of land for housing to compensate for previous years of under delivery in line with paragraph 73 of the NPPF.</p> <p>The Borough's draft housing trajectory demonstrates that Ipswich cannot meet its current five-year housing land supply, let along the additional 20% buffer required to compensate for its failure to meet the Housing Delivery Test.</p>
25647	Turnberry Consulting on behalf of Grainger PLC	<p>This policy follows a stepped approach. Whilst a stepped approach to the annual housing requirement is an acceptable approach outlined in the NPPF, we believe in the case of Ipswich this approach is not justified and does not meet the outcomes specified within the guidance (see representation for guidance extract). The Borough's housing requirement has not significantly changed between emerging and previous policies, in fact it has decreased by 10 dwellings per annum. Given the Borough's significant under-delivery of housing over previous years alongside its decrease in housing need, the proposal to step the annual housing requirement is not justified.</p>
25648	Turnberry Consulting on behalf of Grainger PLC	<p>In order to be considered sound and compliant with National Policy, the emerging Plan should consider allocating more deliverable sites that will contribute to meeting the Borough's five-year housing land supply plus an additional 20% buffer as outlined in Paragraph 73 of the NPPF. In short, the Borough must find more deliver sites to boost delivery in the early years of the Plan. If none can be found in the Town's boundaries, then it must work with adjoining authorities to find such sites within the greater urban area.</p>
25917	Turley on behalf of Pigeon Investment Management Limited	<p>There is no evidence of identifying housing needs across the IHMA and how IBCs neighbours are responding to the housing requirements of the Borough.</p> <p>No evidence as to how IBC will deal with the 1,090-home shortfall.</p> <p>The level of housing growth does not match the creation of new jobs proposed in CS13.</p> <p>The lack of a five-year housing land supply cannot be considered to be relevant justification for a stepped housing trajectory,</p>

		and this is contrary to Planning Practice Guidance. The level of affordable housing need and economic growth in this location means additional sites should be considered.
26058	Barton Willmore on behalf of Telereal Trillium Ltd	Welcome use of standard methodology but should be seen as a minimum as per NPPF paragraph 60. IBC is also subject to the housing delivery test 20% buffer. Concerned that IBC will continue to not meet its target for deliverable housing in the first five years of the plan period, particularly with IGS coming in later in the plan period. The Site (IP279) is deliverable and could accommodate 150 homes as part of IBC's five-year housing supply. This would contribute almost 30% of an entire year's supply. Paragraph 68 of NPPF states a mix of sites should be considered.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The starting point for the housing figure is now the 2014-based household projections and the standard method of calculation. Population and employment rates in Ipswich may fluctuate from year to year, but this is a long-term plan looking ahead over fifteen years. There is a clear national requirement to use the 2014-based household projections as the basis for assessing housing need. Ipswich as the county town would expect to have jobs growth which exceeds population growth as it is a major employment centre at the centre of a travel to work area. There is no longer a specific requirement to balance homes and jobs provision, nevertheless, it is recognised that there is a relationship between them which needs to be considered broadly. The Council has taken account of the more recent (lower) jobs forecasts for the Borough from the East of England Forecasting Model 2017 and the Government's standard method for assessing housing need, which has resulted in a lower housing requirement (CS7) and a lower job target (CS13).

New affordability information published at the end of March 2019 has also been factored into the housing calculations. The baseline date for the plan remains 2018, in order to align with neighbouring plans and much of the evidence base. These assumptions indicate a starting point for the housing requirement of 445 dwellings per annum.

The Planning Practice Guidance advises that in some circumstances it may be appropriate to consider whether actual housing need is higher than the standard method indicates. These circumstances may include where there are growth

strategies for the area, for example where Housing Deals are in place, where strategic infrastructure improvements may increase demand for homes, or where unmet need is being taken from an adjoining local planning authority. These circumstances do not apply in Ipswich and consequently the housing need figure of 445 dwellings per annum (dpa) is incorporated into policy CS7.

The whole plan viability study undertaken shows that across the lower market value areas, which cover much of central and southern Ipswich, development viability is challenging. Therefore, artificially increasing the housing requirement in order to deliver more affordable housing would be unlikely to have the desired effect. The Council is addressing this need through other means including buying dwellings and building its own

The revised Planning Practice Guidance identifies the possibility of 'stepping' the annual housing requirement rather than presenting it as a twenty-year average. This is necessary where strategic sites are likely to have a phased delivery or be delivered later in the plan period. With the Ipswich Garden Suburb coming on-line and the later start proposed for the Humber Doucy Lane housing allocation to tie in with infrastructure delivery at Ipswich Garden Suburb, this is both a necessary and appropriate approach for Ipswich. It reflects what is realistically deliverable and is not an approach which is being deployed unnecessarily to delay meeting identified development needs. The five-year land supply would be measured against the specific stepped requirements for the particular five-year period.

The Council will meet a reduced the annual requirement for the years 2018 to 2024 when the supply will be heavily dependent on brownfield sites delivering high density development. The requirement will then be increased from 2024 to 2036 when it is expected that completions at the Ipswich Garden Suburb will represent a significant portion of the annual housing requirement. As the Ipswich Garden Suburb nears completion, the sites at Humber Doucy Lane would come forward.

The Council has for the Regulation 19 final draft Ipswich Local Plan established a five-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply. The Final Draft Ipswich Local Plan uses a stepped approach to housing delivery which means that the buffer is higher in the first 5 years (as requested by Government). This means that the buffer for the rest of the plan period will be lower. This stepped approach is justified by the expected delivery of the Ipswich Garden Suburb. The inclusion of a windfall allowance in the housing land supply is justified by evidence including trend data on windfall delivery, which is published annually in the Authority Monitoring Report.

The Council considers that the spatial strategy, which places some reliance on the delivery of Ipswich Garden Suburb as a single allocation, is sound. It is a long-standing allocation and two of the parcels are close to having planning permission issued, with final negotiations taking place on section 106 agreements. The development area has a HIF allocation of around £10m to deliver key infrastructure.

Policy CS8 already deals with housing mix and therefore it is not appropriate to add this to policy CS7 also.

The infrastructure requirements linked to housing growth are addressed through policy ISPA2 for cross boundary infrastructure, policies SC15 to CS20 and Tables 8A and 8B of the Local Plan.

22. CS8 – Housing Type and Tenure

Representations	Comments	Object	Support
9		8	1

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26129	Ipswich and East Suffolk Clinical Commissioning Group	Ipswich & East Suffolk CCG would like to raise the importance of creating essential NHS worker housing in the LP to help reduce workforce shortages in the locality. The provision of assisted living developments and residential care homes, although a necessary feature of care provision and to be welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage at a very early stage with the NHS, to plan and implement suitable mitigations.
25845	Ravenswood Environmental Group	Where the Council wants to ... it is asking to deliver 100% affordable housing on its sites, but it is not providing any clarity as to where these sites are. This approach is contrary to the government's objectives to provide mixed and balanced communities. Large scale affordable housing schemes are generally regarded as problematic in social and economic terms which is why development is normally promoted to have a mix of tenures and types of homes to meet the requirements of the whole community.
25880	Associated British Ports	ABP welcomes IBC's policy on housing type and tenure mix and the recognition of potential exceptions to these requirements in response, for example, to viability constraints. ABP also welcomes the desire of IBC to secure high-density development on central sites (para 8.112) which will also assist viability.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25790	Home Builders Federation	<p>Whilst Strategic Housing Market Assessments (SHMA) can provide a broad snapshot in time of what is needed across an LPA or HMA they do not provide a definitive picture as to the demand for different types of homes in specific locations. It should be left for developers to supply the homes they consider are necessary to meet demand.</p> <p>Therefore, suggest that the policy requires applications for housing development to have regard to the evidence on housing mix but that the final mix is left to agreement between the applicant and developer on a site by site basis to establish flexibility.</p>
25792	Home Builders Federation	<p>It is important that the Council revisit the self-build evidence to test whether those individuals currently on the list are still interested in a plot on which to build their own home. This has been the case at the EIP for both the Hart and Runnymede Local Plans. This is to test whether those currently on the list are still interested in a plot. This has been the case at the EIP for both the Hart and Runnymede Local Plans. Our concern is that Council are over-estimating the number of households wanting to build and this will leave plots vacant.</p>
25685	Tetlow King Planning on behalf of Rentplus UK Limited	<p>The reference in the supporting text to Policy CS8 to 9.8% of housing mix to be provided within new housing developments as Starter Homes and 5% as shared ownership should be reviewed, as the amended definition of affordable housing sets a wider range of tenures available to meet needs than paragraph 8.106 suggests. The wording at paragraph 8.141 is more suitable, allowing more flexibility to respond to local housing needs and those identified in the Core Strategy evidence base.</p>
25686	Tetlow King Planning on behalf of Rentplus UK Limited	<p>"We recommend that a brief SHMA update is commissioned to understand how the extended definition of affordable housing tenures can assist the Council in meeting local housing needs, and the supporting text and Policy CS8 amended accordingly. This is particularly important given that the SHMA was completed (May 2017), and updated (September 2017), prior to the formal</p>

		introduction of the Annex 2 definition of affordable housing in 2018 and can therefore already be deemed 'out of date'."
26059	Barton Willmore on behalf of Telereal Trillium Ltd	Telereal considers that an increase in the density of the Site will help IBC to realise this policy. Telereal has considered IBC's Strategic Housing Market Assessment in proposals to develop Areas 2 and 3 of the Site. Paragraph 61 of the NPPF states that the size, type and tenure of housing should be assessed and provided for in planning policies. The increase in the density of the Site will allow Telereal to provide IBC with a mix of house types and sizes, including a percentage of affordable housing.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25628	Private individual	Should be amended to use the same definition of major as set out in the NPPF.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

How these comments have been taken into account in the Final Draft Local Plan:

The definition of major development has been updated to align with the NPPF definition for clarity and the policy amended to clarify that it addresses mix (i.e. size and type) and tenure of homes.

Changes are made to the paragraphs regarding the mix of affordable housing tenures and sizes are to ensure that the plan is accurate and up to date, as the Strategic Housing market Assessment (SHMA) Part 2 report was updated in January 2019. The update was undertaken to check that the national switch to the standard method of calculating housing need was properly reflected in the Part 2 of the SHMA, which analyses housing need by mix and tenure. The findings of the SHMA Part 2 report have been incorporated into a table in the supporting text to indicate what size of provision by tenure would best meet the needs identified through the SHMA.

Amendments are made to the supporting text for consistency within the plan and to reflect the evidence base.

The requirement for all housing schemes of 50 or more dwellings to provide 10% of plots for self or custom build has been deleted. Replacement wording stating the Council will consider the Self Build Register and whether provision of self-build plots

should be included within major developments has been inserted. This is to ensure that the policy requirement to provide self-build plots is reasonable and justified.

The exceptions allowed for through the policy are continued from the adopted policy approach and provide necessary flexibility. Sites where these circumstances may pertain cannot be identified in advance, as it would depend on the nature of the proposal.

The supporting text has been amended to ensure that the potential impacts of new housing for older people on healthcare provision can be considered appropriately. Key worker accommodation is considered in response to representations made to policy CS12 Affordable Housing.

23. CS9 – Previously Developed Land

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This is a deleted policy.

24. CS10 – Ipswich Garden Suburb

Representations	Comments	Object	Support
17	0	13	4

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25610	Westerfield Parish Council	Westerfield Parish Council has noted the contents of Core Strategy 10 and continue to be concerned over the amount housing being proposed and its effect on the village of Westerfield.
25717	Westerfield Parish Council	The parish Council are pleased that Core Strategy 10 continues to include a commitment to the Ipswich Garden Suburb Supplementary Planning Document and also

		the appropriate separation of the "built areas" of the Ipswich Garden Suburb from the village of Westerfield.
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Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25757	Natural England	The scale and design of on-site green space should be assessed to ensure it is sufficient to absorb routine recreational activities. In addition, we advise that on-site accessible space is designed to facilitate biodiversity and support wildlife. Ipswich garden suburb presents a great opportunity for biodiversity net gain and we propose that this is incorporated into Policy CS10. We support policy text that states development proposals will demonstrate accordance with the SPD and positively facilitate the development of other phases of the Ipswich Garden Suburb area.
26069	Suffolk Coastal District Council	The Council welcomes the protection of the physical separation between Ipswich and Westerfield village. This particular protection accords with Policy SCLP10.5 of the Suffolk Coastal Final Draft Local Plan relating to settlement coalescence which aims to prevent the development of land between settlements that leads to urbanising effects between settlements. Policy CS10 also allows for a country park towards the north of the Ipswich Garden Suburb and the Suffolk Coastal Final Draft Local Plan carries forward the allocation of land in the north of Ipswich Garden Suburb as part of the country park (Policy SCLP12.23). Policy CS10 is therefore supported.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26135	Ipswich and East Suffolk Clinical	NHS England are not dispensing new primary care contracts currently so the opportunities of

	Commissioning Group	<p>establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Mitigation for the increase in patients from the proposed Ipswich Garden Suburb will be spread between Two Rivers Medical Practice and the new healthcare facility at the Tooks site.</p> <p>NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. The impact of the development and increase in patients will be mitigated by options currently being explored.</p>
25652	Northern Fringe Protection Group	<p>Some form of northern relief road is clearly required and along with improvements to over-capacity junctions such as Henley Road/ Valley Road and needs to be included in the Infrastructure Tables and delivered for full development of the Ipswich Garden Suburb to be allowed.</p>
25654	Northern Fringe Protection Group	<p>The traffic modelling and air quality assessments for the first phases of the IGS assumed that the Upper Orwell Crossings (TUOC) would proceed and needs to be reviewed to reflect the cancellation of this project. The Planning Inspector was incorrectly advised that full funding was in place for the Crossings and they would proceed.</p>
25657	Northern Fringe Protection Group	<p>The potential impacts of Sizewell C on the IGS and the CS have still not properly been assessed. Concerns regarding the impact of increased rail freight for Sizewell C on the Ipswich-Westerfield line in terms of air pollution, noise, operation of the level crossing and proposed pedestrian bridge.</p>
25660	Northern Fringe Protection Group	<p>There are still no firm proposals for new sewage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. There remains a lack of understanding and detail on what new additional sewage infrastructure will be required or evidence that sewage infrastructure required for the IGS can be delivered.</p> <p>The figure of 13,550 dwellings between 2011 and 2031 is an error that should be corrected.</p>

25728	Sports England	<p>Sport England are broadly supportive of this policy but have concerns regarding the reference to 'dual use playing fields'. It is considered that the policy requirement for outdoor sport should not include school playing fields, as these are not always made available for public use, and over use can affect their quality.</p> <p>The requirement for replacement playing fields for Ipswich School must be in addition to the policy requirements for community outdoor sport provision.</p>
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26072	CBRE	<p>Despite clear evidence submitted through the development management process, unrealistic policy expectations remain under CS10. In particular, the Council's stance on affordable housing provision is untenable given the evidence available to it by virtue of the applications before it. Recognising the provisions of paragraph 64 of the NPPF (2019)), consideration should be given to a 10% threshold with additional provision secured where viability provides. We remain concerned that Policy CS10 remains prescriptive in terms of the use budget set out, and that such detail is unnecessary in Local Plan policy.</p>
25738	Constable Homes Ltd	<p>In terms of affordable housing provision, the Council ought to allow for variances where justified by viability evidence.</p> <p>In terms of phasing, at present, each phase is labelled N1(a), N1(b), N2(a), N2(b), N3(a) and N3(b), which implies that each phase should come forward in numerical order. This must be clarified in order that the Plan is not ambiguous and effective. We therefore suggest that the policy wording be amended to outline how each parcel could come forward individually, whilst still being in general accordance with the Council's growth strategy and the requirement for balanced growth across the strategic allocation.</p>

25592	Department for Education (DfE)	The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure, not least schools, in policy CS10, including references to ensuring infrastructure provision meets needs, timely delivery of infrastructure alongside development and requirements for developer contributions.
25599	Department for Education (DfE)	The DfE strongly supports the allocation of one secondary school and three primary schools at the Ipswich Garden Suburb through Policy CS10.
26080	Mersea Homes Limited	Despite clear evidence submitted through the development management process, unrealistic policy expectations remain under CS10. In particular, the Council's stance on affordable housing provision is untenable given the evidence available to it by virtue of the applications before it. Recognising the provisions of paragraph 64 of the NPPF (2019)), consideration should be given to a 10% threshold with additional provision secured where viability provides. We remain concerned that Policy CS10 remains prescriptive in terms of the and use budget set out, and that such detail is unnecessary in Local Plan policy.
25923	Turley on behalf of Pigeon Investment Management Ltd	There is an adopted SPD for this site, and within this it states that 'the success of the development of the Garden Suburb will depend to a large extent on the continued partnership working of the landowners, IBC and other key stakeholders to secure delivery'. This site is therefore reliant on multiple landowners coming forward and Pigeon would therefore argue that this complication will significantly delay the delivery of the development during the plan period. This concern should be afforded significant weight by the Council given that the Garden Suburb accounts for around half of the supply of housing.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25908	Private individual	<p>The 3,485 homes suggested for CS10, more if Humber Doucy Lane (CS2) are included will create the following issues:</p> <ul style="list-style-type: none"> - Significant increase in car movements around Ipswich, especially to the north. The current road layout is entirely unsuitable for any significant increase; - A northern by-pass would be far less useful than an additional ring-road situated as close to the north of Ipswich; - Adverse effect on air pollution; - Harm to the landscape and environment; - Loss of agricultural land; - No capacity for schools, libraries and health centre; and - Under provision of green space, parks and recreation
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How these comments have been taken into account in the Final Draft Local Plan:

Criterion iv. and Table 8b have been amended. This is because the way in which health care is delivered to communities is changing. The Ipswich and East Suffolk Clinical Commissioning Group states that, currently, NHS England are not dispensing new primary care contracts, so the opportunities to deliver a new health centre at Ipswich Garden Suburb are reduced. This is borne out through discussions held with the healthcare sector in relation to delivery of the Ipswich Garden Suburb development and the supporting infrastructure, in relation to the determination of planning applications. The need generated by the development would be met in different ways under the current approach, which may include on-site and off-site facilities. The model of healthcare provision may change again over the course of the delivery of development at Ipswich Garden Suburb. The wording change would introduce an element of flexibility about how the need is met, whilst still ensuring that provision is made, and would safeguard land within the District Centre for an on-site facility if appropriate.

The housing at the Ipswich Garden Suburb (IGS) is needed to meet the Borough’s housing requirement, in terms of providing numbers and a mix of dwelling types across the Borough. The country park element of the IGS will provide a buffer between the development and Westerfield village, to maintain the identity of Westerfield. The country park was set out as part of the Ipswich Garden Suburb Supplementary Planning Document (SPD) and is a policy requirement through policy CS10 of the Local Plan. The policy retains the statement that development proposals will be required to demonstrate that they are in accordance with the SPD. The SPD sets out the transport strategy for the development and this has also been looked at in more detail through the planning applications that have come forward for Henley Gate and Fonnereau neighbourhoods. Other measures which would mitigate the effect of IGS on Westerfield include improvements to Westerfield Station and the inclusion of local facilities and services within the site to serve the day-to-day needs of the residents.

The dual use playing fields referred to through policy CS10 are addressed through the section 106 agreements being negotiated with the applicants, Crest and CBRE, and planning conditions. These will ensure that a strategy for the dual use facilities will be put in place and community agreement will be secured about how the school will be open. The planning condition will be tied to the school site and the arrangements will have to be in place before the school is brought into use. A potential benefit of the dual use approach is that ongoing maintenance by the schools will be secured, which may result in better quality facilities than may otherwise be the case. The replacement provision for Ipswich School is additional and is protected by the plan through the final paragraph of policy CS10.

The policy allows for an appropriate level of flexibility for proposals to evolve as planning applications and more detailed consideration of sites and proposals are undertaken. In particular, viability is subject to more detailed consideration of proposal costs and values at the point that planning applications are submitted. As identified in the commentary associated with Table 8B, flexibility on the timings could be allowed where it is evidenced through further assessment work, but what is not identified as flexible is the list of infrastructure. Flexibility with regards to the timings/phasing of infrastructure delivery would comply with NPPF objectives in ensuring a degree of flexibility with regards to development requirements, but the list of infrastructure would be fixed by policy. In addition, supporting policy CS12 allows for the affordable housing level to be adjusted where justified in specified instances.

The traffic modelling which informed the IGS SPD did not include the Upper Orwell Crossings, as they were not proposed at the time. The traffic modelling for the IGS applications included sensitivity testing without the Upper Orwell Crossings. The position presented at the last Local Plan Examination on TUOC reflected the evidence available at the time. Air quality assessments for the applications have had addendums added which factor in the fifth Air Quality Management Area in Ipswich. Mitigation measures for the effects of growth on traffic and air quality are being identified through the Ipswich Strategic Planning Area Board and modelling work that has been jointly commissioned by the local authorities.

The housing need figure quoted is now factually incorrect and therefore has been updated. In relation to sewerage infrastructure, no change is proposed, because the responsibility for its provision lies with Anglian Water and they are looking at what work will need to be carried out to accommodate the IGS development.

The traffic modelling does not assess the impact of the potential construction of Sizewell C. because there is not yet certainty about whether it will proceed. There is a separate process for the Sizewell C. application through which its traffic (and other) impacts would be considered.

Traffic and air quality modelling to identify the impacts of growth proposed through the Local Plan review has been carried out or is underway/being updated to reflect latest ISPA growth figures and includes the allocation identified at Humber Doucy Lane. The Local Plan Review identifies the potential transport mitigation measures needed, for example through policy CS20.

The policy already allows for variances based on viability information and therefore no change is needed. The phasing is based on evidence from the Infrastructure Delivery Plan (IDP) and supports the approach to affordable housing provision. It does not imply an order that has to be followed.

The open space provision at the IGS has been established through the adopted Local Plan process and the preparation of the IGS SPD, which was amended to reflect the Open Space SPD adopted in March 2017. Enhancing biodiversity at the site is a requirement of the IGS SPD (e.g. see section starting paragraph 4.44 https://www.ipswich.gov.uk/sites/default/files/inf005_-_ipswich_northern_fringe_spd_-_20_february_2017_email.pdf) and both adopted (DM32) and emerging (DM8) Local Plan policy is clear that all development is required to enhance biodiversity. In addition, it is a requirement of the latest NPPF. Therefore, it is not necessary to refer to biodiversity enhancement in relation to individual sites.

The multiple ownerships at IGS have been taken into account through the preparation of the Infrastructure Delivery Plan for the IGS.

25. CS11 – Gypsy and Traveller Accommodation

Representations	Comments	Object	Support
4	0	3	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25918	Environment Agency	Policy CS11 Gypsy and Traveller accommodation. We are in agreeance with the policy- Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' as defined in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance are not permitted in Flood Zone 3 and require the exception test in Flood Zone 2. These developments are very difficult to make safe through raised flood levels. Therefore, we consider that the requirement for gypsy and traveller sites to be free from flood risk should be maintained in any new policy.
25920	Environment Agency	Policy CS11 refers to Gypsy and Traveller accommodation. We are in agreeance with the policy. In terms of contamination, we are pleased to see that the policy states that the site should be free from significant contamination which whilst broad, does cover any concerns we may have.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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26103	Suffolk Constabulary	To highlight the importance of designing out crime it would be beneficial to include the maximum size of new sites to be 20 pitches or less and that government guidance on best practice must be adhered to.
25835	The National Federation of Gypsy Liaison Groups	<p>Elements of the policy need to be reconsidered.</p> <p>Firstly, the opening paragraph should acknowledge that the requirement for pitches will be kept under review in accordance with a regular update of the Gypsy and Traveller Accommodation Assessment.</p> <p>Subdivision of the second set of criteria into 3 elements (a, b and c) is illogical and unnecessary and will lead to confusion (duplication).</p> <p>Criterion vi could be used to oppose otherwise acceptable proposals.</p> <p>The reference to government guidance is odd because there is no such guidance.</p> <p>Paragraph 8.132 is unclear as it advances additional criteria beyond the policy. We object to this.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

With reference to the comment that the requirement for pitches needs to be kept under review this is agreed. Additional wording has been added in the supporting text accordingly.

The criteria in the policy have been designed around the content of the national policy guidance on gypsies and travellers and the accommodation needs assessment guidance which reflects best practice. Paragraph 8.137 acknowledges local anecdotal evidence of preferences for gypsies and travellers for smaller sites to provide pitches for family groups.

The Environment Agency suggests more attention is given to flood risk for clarity and the wording has been amended accordingly.

The relevant national guidance has been highlighted in the form of a new introductory paragraph 8.130. The definitions of Gypsies and Travellers and Travelling Showpeople have been added to the glossary for clarity.

26. CS12- Affordable Housing

Representations	Comments	Object	Support
8	0	6	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25713	Suffolk Chamber of Commerce	We are pleased with the Council's aim of delivering at least 8,622 dwellings and we hope the appropriate provision will be given for a mix of housing, including high-quality family housing and housing for people on lower incomes.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25881	Associated British Ports	ABP notes the requirement for major new development (10+ dwellings) to provide 15% affordable housing and welcomes the flexibility within the wording of Policy CS12 both in respect of the proportion of affordable housing and tenure mix where development viability justifies it.
26141	Ipswich and East Suffolk Clinical Commissioning Group	Ipswich & East Suffolk CCG would like to raise the importance of creating essential NHS worker housing in the LP to help reduce workforce shortages in the locality. The provision of assisted living developments and residential care homes, although a necessary feature of care provision and to be welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage at a very early stage with the NHS, to plan and implement suitable mitigations.
25844	Ravenswood Environmental Group	The NPPF states that at least 10% of the affordable housing percentage should be discounted market housing. That means that where a Council is proposing 15% affordable housing then the 10% falls entirely within that. Policy CS12 is contrary to paragraph 64 and footnote 29 of the NPPF. The Council is asking that "at least 15%"

		affordable housing should be provided on major development sites. No justification as to why "at least" is used. This is a huge "developer cost" so why is there no mandatory level of affordable housing in the Local Plan as per other Local Plans?
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25682	Tetlow King Planning on behalf of Rentplus UK Limited	Since the Issues and Options stage, the Government has revised the National Planning Policy Framework, "including a new, widened definition of affordable housing which includes at Annex 2 a definition of 'other affordable routes to home ownership', as recognised in the supporting text to Policy CS12. The incorporation of rent to buy within the NPPF and this policy enables the Council to embrace this tenure as a clear part of the response to local housing needs.
26060	Barton Willmore on behalf of Telereal Trillium Ltd	Telereal considers that increasing the density of the Bibb Way site to accommodate further house types and sizes will also contribute to IBC's affordable housing need. As IBC has only allocated the number units granted under prior approval, it is not contributing any affordable housing. By allocating the whole site (including Areas 2 and 3) for a larger number of homes can facilitate a contribution to affordable housing from this Site.
25821	Cardinal Lofts (Mill) Ltd	The Company welcomes the acknowledge that, in some cases, due to high cost of development and 'abnormals' relating to a site, it may not always be viable to provide full provision (as set out in the policy), or any, affordable housing. It is understood that the Council will shortly be progressing with its proposed Community Infrastructure Levy. This will place additional financial burdens upon development and, in some circumstances, reduce the amount of affordable housing that can be provided (on viability grounds).

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25629	Private individual	15% outside of Garden Suburb seems ridiculously low and cannot see how this complies with NPPF para 61. Last sentence should be deleted. Affordable housing providers make their housing distinguishable by adding their own parking and house signs (see Ravenswood).

The following made no comments in response to this issue.

Parish and Town Councils

How these comments have been taken into account in the Final Draft Local Plan:

The policy aligns with the NPPF definitions and sets out an approach which will best meet housing need in Ipswich. Rent to buy falls within the NPPF definition of affordable home ownership and could contribute to the proportion of this type of provision required on development sites of fifteen or more dwellings.

The policy reflects the viability evidence and, at present, the Council is not progressing a Community Infrastructure Levy.

This policy together with policy CS8 Housing Type and Tenure (which specifically addresses housing mix) aims to meet needs in Ipswich. The housing requirement set out in policy CS7 has reduced, in line with the Planning Practice Guidance.

The affordable housing requirement is set at 15% to reflect the viability evidence and is expressed as a minimum to reflect the level of need in Ipswich (which is approximately 36% of new homes). The proposed new text refers back to the Strategic Housing Market Assessment, which identifies the need, the Whole Plan Viability Report and the National Planning Policy Framework, with which the plan needs to comply. The policy still allows development viability to be factored in, in negotiating the appropriate amount and type of affordable housing provision in a private development on the basis of the whole plan viability report which shows variable values across the Borough. However, the starting point for negotiating the tenure mix is that more affordable homes for rent should be delivered than affordable home ownership, as this is what will best meet the needs of specific groups within Ipswich. The Council considers that affordable housing should be indistinguishable from market housing, in order to support community cohesion.

The proposed revisions refer to updated evidence on relative affordability in Ipswich compared with the housing market area and England, in order to explain the current approach to key worker housing in the plan, which does not include making specific provision. The Council considers that the policy approach to affordable housing provision, combined with the Council’s own home building programme, will assist in meeting all forms of housing need.

The proposed allocation of IP279 through the Site Allocations DPD is considered there.

27.CS13 – Planning for Jobs Growth

Representations	Comments	Object	Support
6	0	5	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25714	Suffolk Chamber of Commerce	We will be pleased to work with Ipswich Borough Council with the aim of helping to deliver the economic, business and job growth namely 15,580 jobs by 2036. Nevertheless, we wonder whether this target is realistic given the challenge of delivering new housing, the future supply of labour and skills and the possible effects of Brexit. Furthermore, a recent report by Centre for Cities highlighted that Ipswich was losing more people per annum than other towns and cities. However, we reiterate the point that sites currently allocated for employment should be sustained due to their importance for economic growth.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25663	Northern Fringe Protection Group	The evidence base ignores latest population and employment figures. It fails to consider the potential impacts of the drop of employment people from 67,300 to 66,500 in the latest NOMIS figures. Evidence clearly demonstrates that Ipswich employment is considerably exposed to macro-economic events and that it is far too simplistic and incorrect to assume steady straight-line jobs growth, which is more removed from reality. Refinement of the employment modelling is required. The jobs creation numbers are not realistic. “Jobs” needs to be defined and “encourage” changed

		to “aims to deliver”. Paragraph 41 of the Topic Paper is incorrect.
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25935	Ashfield Land Limited	<p>The target for job growth fails to reflect the role of Ipswich as the economic driver for the wider sub-region. The figure is based on the baseline 2016 EEFM forecast. It fails to provide for growth beyond the baseline forecasts.</p> <p>The policy is also worded in a way to encourage the provision of approximately 15,580 jobs. This is not framed in a positive way, e.g. by stating that this figure is as an absolute minimum.</p> <p>The jobs figure should be reviewed and reflect a more ambitious target reflecting the role of Ipswich in the wider Functional Economic Area.</p>
25882	Associated British Ports	<p>Ideally ABP would like the inclusion of policy and wording which specifically seeks to support and protect the function and role of the Port in the town. This would be consistent with the existing recognition given in the NALEP Strategic Economic Plan.</p> <p>In the context of the above, the new policy should:</p> <ul style="list-style-type: none"> - Identify the operational Port estate and its relationship to the town centre and IP-One area; - support port development and the growth of the port; and - address the particular development considerations in the interface area between the port estate and the town centre and IP-One areas.
25719	Freeths LLP on behalf of Aquigen	<p>Based on the over-allocation of land identified by the Evidence Base, we consider that the proposed allocations under the Local Plan require further review. This is to ensure the Local Plan is justified and consistent with the Evidence Base. If not, the Local Plan cannot be found sound. In order to achieve soundness, we recommend the proposed allocations are reviewed to reduce the amount of land that is allocated. We recommend that</p>

		the amount of land identified for allocation in the Plan is reduced under Policy CS13 and the supporting paragraphs.
25690	Boyer on behalf of East of England Co-Operative Society	<p>Boss Hall Business Park is safeguarded for employment and ancillary uses (Policy DM33). The safeguarding of this site is supported, provided it is not restricted to B-Class employment uses (see further comments on Policy DM33).</p> <p>It is noted that Policy CS13, criterion c, recognises other employment-generating uses to include, inter alia, leisure and retail, and this is supported.</p>

The following made no comments in response to this issue.

**Parish and Town Councils
Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

The suggested change to the policy wording from ‘encourage’ to ‘aims to deliver’ has not been undertaken. The use of ‘encourage’ was deemed acceptable as part of the adopted Local Plan. The alternative wording has a similar effect. Consequently, the use of ‘encourage’ would retain the policies ability to respond flexibly to economic circumstances and be aspirational in delivery

A definition for ‘jobs’ has been included to provide greater clarity on this.

Paragraph 16 of the NPPF (2019) states that plans should be prepared positively in a way that is aspirational but deliverable. Paragraph 81 of the NPPF requires planning policies to be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

The employment forecasts and employment land supply have been refined. The 2017 East of England Forecasting Model (EEFM) shows that the jobs delivery for Ipswich equates to approximately 9,500 jobs. As this represents approximately a 40% decrease compared to the 2016 EEFM data it was considered appropriate to elect for the updated evidence base. The differences between the 2016 EEFM and 2017 EEFM and the selection of a dataset will be explored as part of a separate strand of work to support the Local Plan. In terms of employment land supply, this has been lowered from approximately 32ha to just over 28ha. The majority of this reduction was arrived at due to the commencement of the permission at IP147 which represented just under 5ha of employment land and the addition of 1ha through the change of IP029 from residential to employment. The reduced figure of 28ha is still approximately 5ha greater than the baseline minimum set out in the Economic Sector Needs Assessment (2018) of roughly 23ha. This higher figure of 28ha is necessary to ensure there is a range and choice of sites across the Borough and the plan period. For example, the land at IP141a(1) is the highest, undeveloped, employment site in the Borough and

it's important that sites such as this are available to potential occupants for development.

In order to make clear that the protection and growth of the port is supported, specific reference has been added into the policy wording to this effect. This is in response to comments from the Association of British Ports. In addition, it is suggested that some additional lower case text to support consideration of the interface between the port, the town centre and IP-One areas.

Notwithstanding the amendments, the importance of the Port as a key economic sector in Ipswich is also referenced by way of the Council taking account of the New Anglia Local Enterprise Partnership Economic Strategy for Norfolk and Suffolk, as shown in paragraph 8.157 of the Preferred Options Core Strategy. In addition, the West Bank and Cliff Quay fall within Employment Areas which cover a significant proportion of the Ipswich Port and are protected by virtue of Policy DM33 (Protection of Employment Land).

The Island Site (IP037) is allocated as a long-term mixed-use residential-led development within Opportunity Area A of the Preferred Options Site Allocations DPD. Nevertheless, the provisions of Policy DM33 and DM18 (Amenity) of the Core Strategy would serve to protect the existing port uses here from inappropriate development and unsuitable neighbouring uses, subject to meeting the relevant criteria.

28. CS14 – Retail Development and Main Town Centre Uses

Representations	Comments	Object	Support
5	0	4	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25704	Suffolk Chamber of Commerce	Suffolk Chamber supports the continued development of the Waterfront as a significant cultural and leisure hub and economic driver in the town. We support the Council’s wish to regenerate and provide sustainable growth in this area alongside the Portman Quarter. Likewise, we support the development of the town’s retail offer but welcome the focus on new office, hotel, culture and leisure developments in and around the town. As a caveat however, we would like to see further research on hotel use to ensure any new hotels will be occupied and not sat surplus to demand.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25671	Northern Fringe Protection Group	Support the intention to undertake an update to the Retail and Leisure Study to determine whether the standard floorspace forecasts need to be moderated to accurately reflect recent trends. The study needs to consider whether there is enough demand to maintain the current town centre or whether more of it might be developed for housing instead of Humber Doucy Lane. We question the need to allocate part of the Westgate Site, the Mint Quarter and extended the Central Shopping Area. The forecast jobs growth in the retail sector is questioned and needs to be reassessed.
26104	Suffolk Constabulary	To highlight the importance of designing out crime consideration must be given to the impact of 'urban greening' on the provision of CCTV throughout the town. (This is also referred to in CS3: IP-one Area Action Plan and Policy DM9 which quotes an aspiration of 22% canopy cover by 2050)

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25724	Freeths LLP on behalf of AquiGen	Note that the Council is preparing an update to the Retail and Commercial Leisure Study to inform the Regulation 19 plan consultation by Summer 2019. We intend to comment as necessary on this policy and the updated Retail Study at that time (if required).
25691	Boyer on behalf of East of England Co-Operative Society	Policy CS14 is supported.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

An additional sentence explaining the need to consider CCTV has been included in the reasoned justification. This is in response to feedback from Suffolk Constabulary

and has been included to ensure that environmental enhancements and urban greening projects are mindful of CCTV, in the interests of public safety.

The potential re-allocation of land allocated for retail into land allocated for housing is a matter for the site assessments of the Preferred Options Sites Allocations DPD. The Retail and Leisure Study Update that informs the Final Draft Local Plan Review has determined that there is a need for approximately 9,900sqm of comparison floorspace over the 10 year period. As the sites that are already allocated are only marginally above this requirement it is not considered appropriate to re-allocate any of the retail land for residential use.

The Westgate, Mint Quarter and extended Central Shopping Area allocations have not been amended. These allocations represent town-centre sites that are located in close proximity to the existing retail core and would build upon the existing well-functioning retail centre. New retail floorspace in these locations helps to address the qualitative deficiencies in the town centre, namely the lack of choice of large floor plate shop units.

Additional research on hotel use is not necessary. The 2017 Retail and Leisure Study included a Hotel Needs Assessment which has been used to inform the allocation of sites for hotel use, including the Old Cattle Market on Portman Road (IP051). Overall, officers are of the opinion that the existing hotel research is sufficient to inform the preparation of the Local Plan Review.

29. CS15 – Education Provision

Representations	Comments	Object	Support
5	0	4	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25593	Department for Education (DfE)	The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure, not least schools, in policy CS15, including references to ensuring infrastructure provision meets needs, timely delivery of infrastructure alongside development and requirements for developer contributions.
25595	Department for Education (DfE)	Key national policies should be explicitly referenced or signposted within the document. In particular: Paragraph 94 of the NPPF. The DfE supports the principle of Ipswich Borough Council safeguarding land for new schools. Where new schools are developed, land for any future expansion of new schools

		<p>should be safeguarded.</p> <p>The Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011).</p>
25597	Department for Education (DfE)	<p>A good example is an approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD, 2016). The DPD provides policy direction, establishes the Council's approach to providing primary and secondary school places and helps identify suitable sites. The DPD may provide useful guidance with respect to an evidence-based approach to planning or new schools in the emerging Ipswich Local Plan, securing site allocations for schools and providing example policies to aid delivery through development management policies.</p>
25598	Department for Education (DfE)	<p>Ensuring there is an adequate supply of sites for schools is essential and will ensure that Ipswich borough council can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.</p>
26003	Suffolk County Council	<p>See appendix 5 for detailed comments. In summary it's estimated:</p> <ul style="list-style-type: none"> - Three new primary schools required at Ipswich Garden Suburb, and a secondary school. - A new primary school on Carr Street (IP048a) - The County needs to consider whether to expand existing schools or deliver a new primary school in the south-west. - Land required to enable the expansion of Rose Hill Primary School (IP10a). <p>Envisaged that school place capacity could be provided to serve growth but would need to be reassessed based on actual quantum of growth.</p> <p>The County working to consider longer term needs for post-16 education.</p>

The following made no comments in response to this issue.

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This policy, together with site specific proposals in the Local Plan, already provide for the need for school space identified by the County Council. However, it is important to safeguard expansion space for schools where the need may not yet be identified, and consequently additional wording is proposed for the policy. The explanatory text has been extended to clarify compliance with the National Planning Policy Framework, paragraph 94.

The Local Plan performs the role described – responding to the need for school places created by planned growth by allocating sites for provision - and therefore another development plan document is not needed.

Ipswich Borough Council works closely with Suffolk County Council to ensure that the future need for school places is planned for. This has been outlined in a new paragraph in the reasoned justification for clarity.

The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (Policy SP7) and the Core Strategy and Policies Development Plan Document (Policy ISPA2, ISPA4 and CS10) provide for the need for education provision that the County Council has identified. There has been ongoing dialogue between the Councils to identify where the need will be met. The change proposed to the policy in response to the Department for Education will help to ensure that land is safeguarded for any expansion, should the ongoing post-16 work identify a need for it.

The Council has worked with Suffolk County Council to identify the need for new or expanded schools and identify suitable sites. Local Plans are subject to review within five years of adoption and the need for additional school places would be reviewed as part of the overall process. If the need for a school site changed in the shorter term, the planning system provides for evidence in support of alternative uses to be considered as a material consideration.

The Plan identifies the infrastructure needed to support its growth through Tables 8A and 8B of the Core Strategy. Table 8B is specific about schools’ provision at Ipswich Garden Suburb, and for consistency, Table 8A is amended to be specific and clear about needs outside the Ipswich Garden Suburb. Site allocations already indicate where land will be needed for education provision, for example site IP048 and IP010a.

The reference to Travel Ipswich has been deleted as this is no longer active. In its place, a general comment regarding the mitigation of traffic impacts on congestion and air quality in relation to sustainable travel to educational establishments has been included.

30. CS16 – Green Infrastructure, Sport and Recreation

Representations	Comments	Object	Support
17	0	10	7

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26041	Sproughton Parish Council	Your recognition of the ecological importance of Chantry Park and the Gipping Valley is important to the Parish Council. Especially the link between the two through Chantry Vale where the local residents frequently see the movements of animals between the two areas... and it is hoped that IBC will recognise the importance of maintaining a realistic wildlife link between the Gipping Valley and Chantry Park through Chantry Vale, and the retention of the best of the Vale for its recreational/landscape value should any of this land come forward for development in the future.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25921	Environment Agency	Policy CS16 - Green Infrastructure, Sport and Recreation. Paragraph 8.189 refers to Natural Flood Management. The wording of this paragraph could be further enhanced by incorporating reference to reducing flooding by working with natural process, reconnecting watercourses with flood plains to enhance flood storage in times of need and taking opportunities to restore watercourses to a naturalised state. This should be considered and incorporated into developments whenever opportunities arise. Such measures can provide benefits in terms of biodiversity, amenity, health and wellbeing and should be incorporate into the scheme design from the outset.
25922	Environment Agency	We are pleased to see the inclusion of Policy CS16 - Green Infrastructure, Sport and Recreation. We welcome that paragraph 8.189 also suggests low lying areas are identified for flood storage. It could be good to include this within the SFRA.
25928	Environment Agency	EA suggests inclusion of a section of text on "blue corridors". Blue corridors involve setting

		back urban development from watercourses, overland flow paths and ponding areas creating a mosaic of urban corridors designed to facilitate natural hydrological processes whilst minimising urban flooding, enhancing biodiversity and improving recreation. The recreation activities normally relate to walk or cycle routes alongside the River. IBC have tried to establish public access along the urban river Gipping to allow canoe and kayak access as part of voluntary agreements. The policy/plan could be enhanced by including reference to maintaining public access to the water itself.
25934	Environment Agency	The following site allocations have been identified as potentially important to the feasibility of establishing public access along the urban river Gipping to allow canoe and kayak access to the river Gipping: * IP003 * IP015 * IP031 * IP037 * IP047 * IP083 * IP105 * IP119 * IP120b * IP132 * IP136 * IP147 * IP149 * IP188 * IP346 Consideration should be made when developing these sites to ensure that this promotes public access to the River Gipping.
26070	Suffolk Coastal and Waveney District Councils	The Council supports and welcomes the approach of working with partners in respect of the Recreational Avoidance and Mitigation Strategy and a new country park within the Ipswich Garden Suburb. Both of the aforementioned aspects of this policy are reflective of the joint work being undertaken between the Council and IBC. The Council also supports joint working with IBC and other neighbouring authorities to deliver strategic green infrastructure. In particular the establishment of a green rim around Ipswich is reflected in Policy SCLP12.24 'Land at Humber Doucy Lane' in the Suffolk Coastal Final Draft Local Plan.
25988	Suffolk County Council	Joint Suffolk Health and Wellbeing Strategy - Outcome 1: Every Child in Suffolk has the best start in life As set out in this letter, our authorities will work together to ensure that sufficient choice of school and pre-school places are provided

		to meet demands arising from development. The Plan also promotes safe and sustainable travel, and access to green space. Policies CS16 and DM6 are key in this regard, with the Public Open Space SPD setting standards in respect of formal and informal recreation and play - which are key in a child's development.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25572	Ipswich Canoe Club	This part of the Plan is focused on land-based recreational/ sports facilities (nothing water/ river based). Recommended to include more statement of vision based around ongoing engagement with relevant local people and groups to achieve better recreational, leisure and economic use of the Rivers. River portages, facilities and parking could be better to encourage more use. Better flow of the river Gipping would reduce weed on the river, requiring co-ordination with Environment Agency. Better access between the Orwell and Gipping. Support local community projects. Vision could be more imaginative (e.g. Norwich, Cambridge or Upper Thames?).
25672	Northern Fringe Protection Group	The proposed allocation of land for housing at the northern end of Humber Doucy Lane is in breach of this policy.
25775	RSPB	Support the intention to enhance biodiversity, the commitment to partnership working and extending the ecological network. Consistent with national policy.
25875	Save our Country Spaces	The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of policy CS16.
25729	Sports England	Sport England supports this policy, in particular the reference to the need to protect, enhance or extend existing open spaces and sport and recreation facilities. We also support the reference to improving access to existing facilities where appropriate.
26105	Suffolk Constabulary	To highlight the importance of designing out crime the following clause should be added:

		'k. working with local police and community partners to ensure that all opportunities to design out crime have been taken prior to the commencement of any project and as part of the on-going management of any open spaces, sport or recreational facilities.'
25618	Suffolk Wildlife Trust	We support the intentions of this policy to enhance and extend the ecological networks and green corridors in the Borough, including through requiring new open space to include enhancements for biodiversity.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26073	CBRE	Policy CS16 includes proposed amendments recognising the relationship of green infrastructure and RAMS. The Policy should further recognise the role of the IGS Country Park as an element of an overall mitigation strategy, and the cross-boundary relationships which exist under ISPA3. A comprehensive, rather than compartmentalised approach to mitigation is required and should be reflected in Policy.
26081	Mersea Homes Limited	Policy CS16 includes proposed amendments recognising the relationship of green infrastructure and RAMS. The Policy should further recognise the role of the IGS Country Park as an element of an overall mitigation strategy, and the cross-boundary relationships which exist under ISPA3. A comprehensive, rather than compartmentalised approach to mitigation is required and should be reflected in Policy.
25822	Cardinal Lofts (Mill) Ltd	Whilst the Company generally support the objectives of this policy, it considers that there should be explicit recognition that, on high density sites within the IP-One Area, and particularly along the Waterfront, it will not be possible to make full provision for private, and public, open space, in accordance with the Council's standards. Open space is a very 'land hungry' use and, if developments have to meet full standards, densities will be greatly reduced. This could threaten the achievement

		of the Council's spatial strategy and result in new development not making the best, and most effective, use of previously developed sites.
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The following made no comments in response to this issue.

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Blue corridors have been included as part of the policy wording. Blue corridors are equally important as green corridors and it is important that the policy is clear that these are an important part of the delivery of this policy.

Criteria C of the policy has been amended to include reference to water/ river-based activities. As currently worded, the policy does not specifically reference the need for water/ river-based activities to be extended, enhanced or protected. These activities, like land-based activities, offer recreational benefits to people and it is important that their access is included.

The paragraph on open spaces and flooding has been amended to provide greater clarity on the mechanism of Natural Flood Management. This is in response to the recommendation of the Environment Agency. It aims to provide developers with further detail on how to consider this when preparing planning applications.

The Site Sheets have been amended to include details of recreational public access to rivers. This is in response to requests from the Environment Agency and Ipswich Canoe Club. These changes are listed in the relevant Site Sheets assessments.

The delivery of a new country park and visitor centre within the Ipswich Garden Suburb is already recognised as an important part of the delivery of Policy CS16 (criterion h) which is a strategic policy, in part recognising the wider role of the country park. Subsequently the delivery of the Country Park is included as part of the overall mitigation strategy to deliver the key aims of Policy CS16. However, it is also designed to meet the recreational needs of the future occupants of the Garden Suburb. The need to work with strategic partners and developers has been added to criterion h.

The proposed allocation of Humber Doucy Lane for future development is not considered to breach Policy CS16. The land was designated as Countryside and therefore the provisions of Policy DM11 will apply. The need to include the green rim is acknowledged in Policy ISPA4. The master planning will need to factor in the inclusion of Green Corridor (D) in accordance with the requirements of Policy DM10, as well as accord with the biodiversity needs of Policy DM8. Consequently, the proposed allocation of this land for potential development is acceptable in principle but will need to comply with the relevant Development Management Policies.

An additional clause (k) regarding designing out crime has been included in the policy following the request from Suffolk Constabulary. This has been inserted as a means of highlighting the importance of designing out crime which is critical to the effective

delivery of green infrastructure and public safety but needs to be appropriate to the context.

The Vision, as set out in paragraph 6.7 of the Preferred Options Core Strategy, has not been amended in respect of blue corridors and water. The vision, as worded, already includes specific reference to the commitment to protect and enhance open water to support its use by people and wildlife. Overall, the vision is considered to be effective in setting out the Council’s ambitions in respect of open water.

Policy CS16 has not been amended to give explicit recognition of the deliverability of full provision for open space being challenging in high-density developments. Policy DM6 addresses this matter succinctly

There will be allowances for high-density schemes in terms of the inclusion of on-site open enhancements as this allows for the schemes development viability to be considered and for alternative off-site provision to be provided where space is limited. As a result, it is not necessary to repeat this in Policy CS16.

The supporting text has been amended to Policy CS16 to clarify that RAMS would be required in addition to on-site mitigation (SANGS). This is a requirement of the HRA assessment.

The Council recognises the wildlife link between the Gipping Valley and Chantry Park. The Council considers that an integrated network of accessible open spaces is an essential part of the Borough’s infrastructure and character and allows for wildlife to flourish and migrate around the area. This is explained in the opening paragraph of the reasoned justification. This role applies to all of the Borough’s parks including Gipping Valley and Chantry Park.

31. CS17 – Delivering Infrastructure

Representations	Comments	Object	Support
13	0	10	3

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25707	Anglian Water	Policy CS17 should refer to both the use of conditions where appropriate as well as planning obligations in relation to the provision of infrastructure.
25594	Department for Education (DfE)	The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure, not least schools, in policy CS17, including references to ensuring infrastructure provision meets needs, timely delivery of infrastructure

		alongside development and requirements for developer contributions.
25608	Department for Education (DfE)	<p>One of the tests of soundness is if the Local Plan is 'effective'. In this context there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school place required to meet increase in demand. The DfE supports the approach to ensuring developer contributions address the impacts from growth.</p> <p>The council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement. The statement should identify the anticipated S106 funding towards infrastructure arising from the need for school places. It should be reviewed annually.</p>
25936	Environment Agency	<p>Policy CS17 - Delivering Infrastructure. The policy refers to the Community Infrastructure Levy (CIL) and outlines the types of infrastructure that can be secured or financed from new developments. This includes, but is not limited to, Environment and Conservation as well as Sport and Recreation. Norwich Railway line sluice on the River Gipping had its gates removed a number of years ago. The concrete structure remains and requires removal. This policy could be used to help fund the structures removal to ensure public access to the river and provide environmental improvements as outlined in our response to policy CS16.</p>
25939	Environment Agency	<p>Paragraph 8.198 refers to appendix 4 which lists the types of infrastructure referred to within Policy CS17. We would expect to see wastewater/sewerage infrastructure listed in the utilities section because it is likely that some improvements will be required in order to enable or facilitate growth. The bullet point names "water" could be further expanded to say "water - potable and wastewater supply".</p>
25940	Environment Agency	<p>Paragraph 8.199 highlights the pressure that growth and development put on existing infrastructure and correctly identifies that there will be a need to upgrade existing infrastructure within the borough. This paragraph could be strengthened to reflect the need to ensure growth and development is phased in line with these upgrades to</p>

		infrastructure, particularly water utilities infrastructure.
25709	Suffolk Chamber of Commerce	<p>Approve of the aim of this policy. Support the introduction of innovative transport and parking solutions to tackle congestion, as well as a simpler and cost-effective park and ride scheme, better bus services, more electric vehicle charging points and cycle route improvements.</p> <p>Support proposals that create better links between the retail centre and both the railway station and the waterfront. There is an urgent need for the provision of a taxi-rank on the Waterfront. We would like to see the case for this made in the Local Plan.</p> <p>We hope the Council continues to back our A14 campaign.</p>
25973	Babergh Mid Suffolk District Council	The Councils would express support for the approach to the Recreational Avoidance and Mitigation Strategy referred to in policy CS17 and paragraphs 8.21 and 8.202.
25977	Suffolk County Council	<p>CIL is complex, but it's clear that a significant amount of the infrastructure is to mitigate cumulative impacts. Government indicated that it may abolish restrictions on pooling of planning obligations. If not, then challenging without CIL. Council should consider CIL.</p> <p>Site-specific transport measures best delivered through S106 and S278 agreements. An approach to delivering sustainable transport measures must be agreed.</p> <p>Additional demands on local libraries which are community hubs.</p> <p>Developer contributions needed to mitigate impacts of growth but requiring obligations will be challenging in context of proposed relaxation of obligations.</p> <p>County will prepare list of library improvements. Include in IDP.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25800	East Suffolk and North Essex NHS Foundation Trust	<p>It is noted that health and emergency services are referred to, although there is no specific reference to acute hospital facilities. Therefore, for completeness, the following additions to the Policy and supporting text are requested:</p> <ul style="list-style-type: none"> - Point 3 on page 76; - Bullet point 7 on page 76; and - Page 152 - list of strategic infrastructure utilities under community facilities. <p>See full text for suggested amended wording.</p>
26127	Ipswich and East Suffolk Clinical Commissioning Group	<p>Policies should be explicit that contributions towards healthcare provision will be obtained and the LPA will consider a development's sustainability with regard to effective healthcare provision.</p> <p>The nature and scale of the contribution and subsequent expenditure by NHS will be calculated as and when schemes come forward.</p> <p>The LPA should have reference to the most up-to-date strategy documents from NHS England and the CCG.</p> <p>Plans/ policies should be revised to ensure that they're specific enough in their aims, but are not in any way prescriptive/ binding on NHS England or The CCG to carry out certain development within set timeframes.</p>
25673	Northern Fringe Protection Group	<p>Concerned that the development of the IGS without adequate new road infrastructure will severely impact on traffic congestion and air quality.</p> <p>The Transport Assessment indicate that some form of relief road or northern bypass will be required in the north of Ipswich. This is recognised in policy ISPA2. The need for Ipswich Northern Routes to deliver IBC's CS Preferred Options needs to be more strongly reflected in the CS. The implications of the timing or non-delivery of a northern relief road need to be assessed and planned for. It should be added to tables 8A and 8B.</p>
25619	Suffolk Wildlife Trust	<p>We support the inclusion of strategic green infrastructure and the Recreational Disturbance Mitigation Strategy in this policy.</p>

The following made no comments in response to this issue.

**Parish and Town Councils
Developers and Landowners**

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The focus of this policy is securing developer contributions to infrastructure provision. Conditions may be used to secure the timing of infrastructure delivery and wording has been added to the supporting text to explain this.

The Plan identifies the infrastructure needed to support its growth through Tables 8A and 8B of the Core Strategy. Table 8B is specific about schools’ provision at Ipswich Garden Suburb, and for consistency, Table 8A has been amended to be equally specific and clear about needs outside the Ipswich Garden Suburb. Allocations are made to safeguard land as necessary (see policies CS10 and SP7). An Infrastructure Funding Statement will be required in future to outline the infrastructure projects a local authority intends to fund through developer contributions and identify how much money has been raised through developer contributions and how it has been spent. This detail would be inappropriate in the Local Plan.

The location of taxi ranks is matter that can be progressed outside the remit of the Local Plan, as the designation process falls under other regulatory regimes and work is ongoing out with the Local Plan process to explore the need for a taxi rank at the Waterfront.

The Council is not currently progressing Community Infrastructure Levy.

Removal of the concrete structure on the river path has been added to the Site Allocations Plan (supporting text to policy SP15). The River path is an important link in the sustainable travel network of the town.

The categories included in CS17 are broad, as it explains, and are expanded within Appendix 4. Therefore, Appendix 4 is the appropriate place to provide more detail of what falls within the broad ‘health’ heading to refer to acute services. This is also where reference to potable and wastewater supply has been added for clarity.

Reference has been added to where the transport mitigation measures are identified and how they will be secured, and to section 278 as a mechanism, for completeness. Reference to libraries has not been added to the policy, as they are already listed in Appendix 4.

The Northern Route Options have been out to consultation, but the scheme is not sufficiently advanced to be included in this Final Draft Ipswich Local Plan.

Policy CS17 already lists health and emergency services as infrastructure to be secured or financed from new developments. Table 8A will set out any specific improvements needed where they are known.

32. CS18 – Strategic Flood Defence

Representations	Comments	Object	Support
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1	0	1	0
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Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25575	Marine Management Organisation	Recommends deletion of final sentence of paragraph 8.208 on page 78. This is to take account of the references to the relevant marine plans.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The sentence highlighted by the Marine Management Organisation has been deleted accordingly.

Clause c in the supporting text has been amended to confirm that the tidal flood barrier was completed in February 2019.

33. CS19 – Provision of Health Services

Representations	Comments	Object	Support
4	0	4	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25798	East Suffolk and North Essex NHS Foundation	The policy wording requires ESNEFT, the statutory health authority and provider to demonstrate to the Council that development proposals would not compromise the future delivery of health services. This implies that the LPA is seeking to play the role of health authority, which is obviously the function of ESNEFT. However, it is acknowledged that development proposals for the hospital site should be considered in the context of a masterplan and suitable transport strategy,

		<p>which ESNEFT is currently preparing. Consequently, revised wording to the first part of Policy CS19 is sought, as well as amendments to paragraph 8.212 (see full text).</p>
26125	Ipswich and East Suffolk Clinical Commissioning Group	<p>Currently healthcare provision incorporates a total of 13 GP Practices (many of which include health centres) and 2 branch surgeries, 36 pharmacists, 26 dental surgeries, 20 opticians, 0 community hospitals and 6 clinics. These are the healthcare services that the LP must take into account in formulating future strategies.</p> <p>Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. This response relates to the impact on primary care services only. As a rule, existing GP practices in the area do not have capacity to accommodate significant-growth.</p>
26126	Ipswich and East Suffolk Clinical Commissioning Group	<p>In terms of optimal space requirements to encourage a full range of services to be delivered within the community there is an overall capacity deficit, based on weighted patient list sizes, within the 13 GP Practices and 2 branch surgeries providing services in the area.</p> <p>NHS England working with the CCG, Local Authorities and local stakeholders has begun to address Primary Care capacity issues in the area and currently have projects to increase capacity underway across the Ipswich Borough Council area. These projects vary in size and will initially deliver additional capacity to meet previously identified growth requirements.</p>
26128	Ipswich and East Suffolk Clinical Commissioning Group	<p>Should be a reasonably worded policy that indicates a supportive approach from the Local Planning Authority to the improvement, reconfiguration, extension or relocation of existing medical facilities. This positive stance should also be indicated towards assessing those schemes for new bespoke medical facilities where such facilities are agreed to in writing by the commissioner. New facilities will only be appropriate where they accord with the latest up to-date NHS England and CCG strategy documents and are subject to The CCGs prioritisation and approval process.</p>

		It is vital that our infrastructure is serviced by adequate public transport systems and communication infrastructure.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy wording has been amended for accuracy in referring to the Hospital Campus site. In addition, it has been amended for clarity in relation to the strategic context for any changes, and local parking issues.

The policy refers to healthcare facilities and the additional supporting text makes it clear that this does not only mean GP Surgeries.

Any specific projects related to Local Plan growth would be listed in table 8A.

Amendments have been made also for clarity that the policy is supportive of changes to healthcare facilities to best meet needs and that the accessibility of facilities by sustainable modes of transport is prioritised. The policy already addresses the accessible location of facilities and provides, exceptionally, for facilities not to be located within an existing centre.

34. CS20 – Key Transport Proposals

Representations	Comments	Object	Support
7	0	6	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25710	Suffolk Chamber of Commerce	Approve of the aim of this policy. Support the introduction of innovative transport and parking solutions to tackle congestion, as well as a simpler and cost-effective park and ride scheme, better bus services, more electric vehicle charging points and cycle route improvements. Support proposals that create better links between the retail centre and both the railway station and the waterfront. There is an urgent need for the provision of a taxi-rank on the

		Waterfront. We would like to see the case for this made in the Local Plan. We hope the Council continues to back our A14 campaign.
26017	Suffolk County Council	The objectives set out in this Policy are broadly appropriate, but our authorities need to carry out further work on the deliverability of these measures in order to incorporate them into an Infrastructure Delivery Plan. The supporting text requires further consideration. Delivery of additional east-west capacity, in order to consider the sort of measures referred to in the 2007 Buchanan report (referred to in 8.221), is not currently programmed. Paragraph 8.223 should be updated to reflect the cancellation of the Upper Orwell Crossings project. Accordingly, the Borough Council should consider the re-wording of Objective 6 of the Plan, accordingly.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25883	Associated British Ports	ABP will continue to assist the Council in developing a feasible solution for east-west transport capacity and for all modes access to the Island site. Also supports the efforts to progress the Ipswich Northern Route Study. ABP's support for access improvements in and around the Waterfront and onto the Island Site is conditional upon there being no operational impact on the Port. Must secure a development solution which addresses all port safety, security and operational issues, avoids any adverse impact on port and marine operations, and accommodates the existing businesses. Support efforts to lobby for improvements to A14 and A12(s).
26132	Ipswich and East Suffolk Clinical Commissioning Group	We support the policy relating to sustainable transport infrastructure linking new and existing communities. We would support development planning that promotes the use of public transport, walking and cycling.

25653	Northern Fringe Protection Group	The Transport modelling fails to identify when these Ipswich junctions will reach capacity and consequently the Core Strategy fails to plan for this.
25655	Northern Fringe Protection Group	Northgate Street / Old Foundry Road junction has a V/C of 115% in the PM peak, which will mean that traffic will be backed up to the Upper Brook Street/ Tacket Street junction therefore blocking buses out of the Old Cattle Market bus station and buses heading into Tower Ramparts bus station. This will make the counter-flow cycle lanes unusable. IBC needs to identify when capacity will be reached and plan for new infrastructure to ensure the required levels of sustainable bus travel are delivered to ensure a reliable service, otherwise modal shift assumptions need to be revised downwards.
25674	Northern Fringe Protection Group	This chapter and the wider CS need to be updated to take account of the decision to cancel TUOC. It is not clear whether the traffic modelling assesses the impact of the potential construction of Sizewell C. Some form of northern relief road is required in order to implement the CS in a sound and effective manner as evidenced in the WSP reports. Model runs 2 and 6 should be provided as part of the consultation process to assess the revised CS. Some Ipswich junctions that are over-capacity have been omitted from the main report. 8.220 needs amending to "will".

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The preferred options version of policy CS20 overlapped with policy ISPA2 and therefore it could create confusion. The proposed amendments clarify that policy CS20 is the Ipswich-specific transport infrastructure needed to deliver the Local Plan growth. It links to Suffolk County Council’s Transport Mitigation Strategy which identifies measures for the whole ISPA area that are essential to delivering growth in Ipswich and in neighbouring authorities. These will be worked up into a more detailed action plan and costed through the Ipswich Strategic Planning Area Board. In the

meantime, very broad estimates have been incorporated into the list of infrastructure requirements at Table 8A in chapter 10 of the Core Strategy Review.

The Council is working with the Highway Authority and Ipswich Strategic Planning Area authorities to put in place the transport mitigation strategy and costed action plan. As well as setting out the measures needed to mitigate the traffic impacts of planned growth, it will also set out the mechanism for obtaining the needed funds to deliver the measures.

The location of taxi ranks can be progressed outside the remit of the Local Plan, as the designation process falls under other regulatory regimes and work is ongoing out with the Local Plan process to explore the need for a taxi rank at the Waterfront.

Wording referring to the operation of the Port has been added to the supporting text following policy CS13.

The supporting text has been amended to update the plan in relation to the Upper Orwell Crossings, following Suffolk County Council’s decision in January 2019 to cancel the project.

The traffic modelling does not assess the impact of the potential construction of Sizewell C. because there is not yet certainty about whether it will proceed. There is a separate process for the Sizewell C. application through which its traffic (and other) impacts would be considered.

The proposed changes to the policy include a reference to cycling and walking infrastructure enhancements.

35. Chapter 9 – Development Management Policies

Representations	Comments	Object	Support
4	0		1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25715	Suffolk Chamber of Commerce	Suffolk Chamber of Commerce believes planning processes and decisions should be supportive of private sector investment and job creation and where possible, new developments should be sustainable, in keeping with the local character and environmentally friendly for future generations. Suffolk Chamber of Commerce and more importantly, our Greater Ipswich board will continue to work closely with Ipswich Borough Council, to ensure that the business voice is heard in planning and development discussions surrounding the towns future. We look forward to seeing how the above

		comments and recommendations fit in the with the Local Plan moving forward.
25986	Suffolk County Council	Suffolk Fire & Rescue Service (SFRS) has considered the draft Plan and considers that, given the level of growth proposed, it is not envisaged that additional service provision will need to be made in order to mitigate any additional demand from growth. However, this will be reconsidered if service conditions change during the plan period. Many elements of fire safety are considered through the Building Regulations. As such, SFRS does not expect the Plan to implement specific policies for promotion of fire safety but would appreciate any steps that the Borough Council can take. E.g. sprinkler systems in new developments.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26106	Suffolk Constabulary	With regards to the Development Management Polices, all polices where new or refurbished building or development is to take place, including open spaces, sport and recreation facilities, health, education and other public sector facilities, commercial and residential types, must include the requirement to adhere to the relevant SBD standards.
25791	Ipswich Faith and Community Forum	With a few exceptions e.g County Hall, BHS there seem to be few references to the re-purposing of buildings - especially historic buildings within Ipswich e.g. churches.

The following made no comments in response to this issue.

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Local Plan sets out the growth strategy for the Borough and seeks to deliver this in a sustainable manner, as per the need for sustainable development.

The comments from the Suffolk Fire and Rescue Service have been factored into policy DM15 (Tall Buildings).

Updates have been made throughout the Local Plan to policies to ensure that secured by design is considered in developments.

Policy DM13 (Built Heritage and Conservation) supports the re-purposing of historic buildings. Policies CS1 (Sustainable Development) and CS2 (Location and Nature of Development) advocate the re-use of existing buildings and brownfield land.

36.DM1 – Sustainable Construction

Representations	Comments	Object	Support
8	0	6	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25688	Anglian Water	Anglian Water supports the inclusion of the optional higher water efficiency standard in the Local Plan Review. We also support the cross reference to the requirements of Policy DM4 relating to the provision of SuDS and water efficiency measures.
25941	Environment Agency	We welcome the inclusion of policy DM1 - Sustainable Construction. We fully support paragraph 9.1.5 which states the East Anglian area is identified as an area of severe water stress and that lowering water demand is identified as one of a range of measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. We are pleased to see inclusion of requiring residential development being required to meet water efficiency standards of 110 litres of water per person per day.
25942	Environment Agency	DM1 - Sustainable Construction. The policy should further make clear that the use of infiltration SuDS, may not be suitable at some sites where contamination is present. Alternative SuDS features should be used in those circumstances.
26049	Historic England	Should clarify whether new development includes extensions to historic buildings. Helpful if supporting text states that when considering sustainable construction and heritage assets that care should be taken to consider both the planning and building regulation implications of proposed interventions in a building. Note that some heritage assets are exempted from

		<p>compliance requirement with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance and that there are special considerations for others such as those of a traditional construction method which will perform differently. However, many heritage assets draw on locally sourced building materials.</p>
26009	Suffolk County Council	<p>DM1 should be amended for clarity, as follows. "Surface water should be managed as close to its source as possible. This will mean the use of Sustainable Urban Drainage systems, including measures such as soakaways, permeable paving and green roofs. green or blue roofs, soakaways and permeable paving."</p>

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26074	CBRE	<p>Policy DM1 remains onerous and fails to adhere to the requirements of paragraph 16(b) of the NPPF (2019) - it is demonstrably not deliverable in a viability sense. The expectation of green and/or blue roofs is not justified and does not appear to have been subject to viability testing.</p>
25998	CBRE	<p>Policy DM1 remains onerous and fails to adhere to the requirements of paragraph 16(b) of the NPPF (2019) - it is demonstrably not deliverable in a viability sense. The expectation of green and/or blue roofs is not justified and does not appear to have been subject to viability testing.</p>
26082	Mersea Homes Limited	<p>Policy DM1 remains onerous and fails to adhere to the requirements of paragraph 16(b) of the NPPF (2019) - it is demonstrably not deliverable in a viability sense. The expectation of green and/or blue roofs is not justified and does not appear to have been subject to viability testing.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The reasoned justification, specifically paragraph 9.1.7, has been amended to include reference to heritage assets and building regulations as considerations in terms of policy flexibility. This is in response to the comments raised by Historic England. The revised wording is considered to ensure that the policy balances the requirement between sustainability and protecting heritage assets and is not overly onerous.

The policy only applies to new residential developments and all non-residential developments over 500 sq m. The policy doesn't include extensions to historic buildings unless they create a new residential planning unit or involve a non-residential extension over 500 sq m. This is in response to the request for clarification from Historic England. It is not considered a change to either the policy wording or reasoned justification is necessary as the policy is clear.

The Council acknowledge that some previously used sites will have contaminated soils. SuDS can still be incorporated, although infiltration SUDS may not be suitable as concentrated ground flow could lead to water-borne contaminants being transferred to deeper soils or sensitive aquifers. Accordingly, SuDS on contaminated land should be lined and designed to attenuate water on or near the surface. The Council will also consider amending Policy DM4 Development and Flood Risk which deals in detail with development and flood risk.

The policy text has been amended to clarify the measures listed are examples of SuDS which should be included in new development. This is in response to comments from Suffolk County Council. The amended text helps the policy to be read more clearly.

Green and/or blue roofs have been subject to the Whole Plan Viability Assessment of the Local Plan as part of the Final Draft stage. These have been accounted for as an external cost and policy DM1 has been reviewed under this assessment and found viable.

37.DM2 – Decentralised Renewable or Low Carbon Energy

Representations	Comments	Object	Support
3	0	3	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26075	CBRE	Policy DM1 remains onerous and fails to adhere to the requirements of paragraph 16(b) of the NPPF (2019) and is made less so by the

		amendments proposed which establishes a compound test rather than an either/or test. The Council's justification and evidence to support the change is awaited.
26083	Mersea Homes	Policy DM1 remains onerous and fails to adhere to the requirements of paragraph 16(b) of the NPPF (2019) and is made less so by the amendments proposed which establishes a compound test rather than an either/or test. The Council's justification and evidence to support the change is awaited.
25897	Montagu Evans on behalf of SSE Generation Development Ltd	SSE requests that a clearer policy relating to the wind energy development - including re-powering and extension - is established in the Local Plan and requests that changes are made to better support future investment in renewable wind energy developments. This can be achieved by: <ul style="list-style-type: none"> - Specific reference to support for re-powering existing windfarm locations; - Identifying existing windfarm locations in the Core Strategy; - Including reference to the acceptance of windfarm developments; and - The provision for and policy support for offshore grid connection, including grid cabling, associated substations and ancillary equipment.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Council consider that 'not either' and 'neither' have the same meaning. As such, the policy continues to provide flexibility where it can be clearly demonstrated that achieving the required percentage provision of renewable or low-carbon energy would not be feasible or viable. However, in the interest of clarity the Council is amending the policy to read should 'would not be technically feasible or financially viable'. A cost for this policy has been factored into the whole plan viability assessment of the Local Plan.

The council acknowledge that onshore wind turbines form an essential part of the UK's renewable energy mix. However, Ipswich is a tightly bounded urban authority, with large areas of below ground archaeology and sensitive wildlife populations and

habitats and is not an obvious location for wind energy development. The Council are however supportive of zero and low carbon energy systems where they do not have an adverse impact which cannot be mitigated. The supporting text of DM2 has been amended to reflect this.

38. DM3 – Air Quality

Representations	Comments	Object	Support
11	0	10	1

Parish and Town Councils

The following comments were made in response to this issue.

Rep. ID. No.	Respondent	Summary
26036	Sproughton Parish Council	The new Air Quality Policy which aims to provide a "safer, greener, more cohesive town" aiming to reduce carbon emissions by providing better public transport, encouraging working at home, reducing the need to travel by car etc. would be implemented in this new Local Plan. The Council likes the sound of this policy and hopes that it is seen through the consultation period to help ease congestion and pollution in our village which is directly affected by the traffic coming in and out of Ipswich on a daily basis; it is hoped that Babergh also follow suit with this policy

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25758	Natural England	Natural England expects the plan to address the impacts of air quality on the natural environment. It should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. One of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.
25759	Natural England	The effects on local roads in the vicinity of any proposed development on nearby designated

		nature conservation sites, and the impacts on vulnerable sites from air quality effects on the wider road network should be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. The designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.
26018	Suffolk County Council	The County recognises that it has a role to play in managing poor air quality in Ipswich. In order to more effectively consider the relationship between vehicular movements arising from development and air quality, it may be appropriate to align the thresholds for Air Quality Assessment with the thresholds for Transport Assessment; i.e. 80 dwellings; or provide the rationale for the figure. Maximising opportunities for healthy and sustainable travel will be fundamental for managing air quality issues in Ipswich. The Council could helpfully refer to specialist housing, e.g. care homes, as being a sensitive receptor (as noted in the policy).

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25658	Northern Fringe Protection Group	There is no Air Quality Assessment provided as part of this consultation. This needs to be completed urgently and needs to include assessments for the early years of planned developments, all construction-related traffic (including sewage infrastructure projects) and rail traffic.
25681	Northern Fringe Protection Group	IBC is not doing enough to tackle the issue of air quality and must do more. Objective 11 of the current Local Plan should not be removed. The additional congestion from traffic modelling will worsen air quality and this is illegal and therefore would render the CS unsound. The CS needs to comply with paragraph 181 of the NPPF and make a clear commitment to improving air quality in Ipswich and the compliance with legally binding air pollution

		<p>targets.</p> <p>Concerns and questions raised in relation to the Air Quality Topic Paper, AQMA and rail assessment.</p>
26142	Northern Fringe Protection Group	<p>IBC is already in breach of guidelines and requirements when assessing the impacts of development on air quality and needs to alter its practices to comply with the Core Strategy.</p>
25857	Ravenswood Environmental Group	<p>The air quality policy would prevent development at Ravenswood because existing peak hour traffic is so great that this would be an Air Quality Management Area had the Borough Council conducted appropriate monitoring at the Nacton Road roundabout. The development at Ravenswood on all of the 6 development sites adds intolerably to air quality concerns without a solution in the Local Plan.</p>
25864	Save our Country Spaces	<p>This plan fails both soundness and legal compliance specifically on environmental health impacts from likely congestion and attendant air quality impacts and pollution. Air pollution deaths are double previous estimates finds research. Ipswich is failing to address air pollution and it's AQAP is inadequate. The SCDC proposals will exacerbate this critical problem. Dust and noise impacts are inadequately assessed and not subject to robust health impact assessments required by NICE etc. IBC are playing "fast and loose" on public consultation on their draft AQAP. The AQAP is not fit for purpose and is unlawful. Concerned over lack of monitoring.</p>
25873	Save our Country Spaces	<p>This plan fails both soundness and legal compliance specifically on environmental health impacts from likely congestion and attendant air quality impacts and pollution. Air pollution deaths are double previous estimates finds research. Ipswich is failing to address air pollution and it's AQAP is inadequate. The SCDC proposals will exacerbate this critical problem. Dust and noise impacts are inadequately assessed and not subject to robust health impact assessments required by NICE etc. IBC are playing "fast and loose" on public consultation on their draft AQAP. The AQAP is</p>

		not fit for purpose and is unlawful. Concerned over lack of monitoring.
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26145	Private individual	Have the environmental costs of air quality come from the EU directive? If not, what evidence used?

The following made no comments in response to this issue.

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

The policy has been redrafted. This has been done to reflect findings from the transport and air quality modelling work in 2019 and to ensure that there is better definition and links to the emerging Low Emissions SPD and the wider air quality work ongoing through the Council’s Air Quality Action Plan work. In addition, the impact on European sites was covered in the air quality screening work and feeds through to the air quality modelling and is also linked through the final draft Ipswich Local Plan HRA work.

The ISPA transport modelling to date has included the Suffolk Coastal District Council regulation 19 sites; Ipswich Borough Council regulation 18 sites; and, Babergh and Mid Suffolk Council’s regulation 18 sites. This will be updated in November to include the final IBC allocations and BMSDC regulation 19 proposals.

The current modelling outputs have been used for an Air Quality screening exercise to inform the extents of the required air quality modelling. The air quality modelling will be undertaken once the output from the updated transport model is completed for inclusion in the local plan submission by the end of March 2020.

The ISPA transport modelling has informed Suffolk County Council’s highway authority response to the ISPA local plans. The evidence has presented a mitigation strategy to address the cumulative impact of growth on Ipswich, with a focus on modal shift. It is anticipated that the updated transport model will be less onerous than the current output and the proposed mitigation is aligned with addressing AQMA’s within Ipswich.

39. DM4 – Development and Flood Risk

Representations	Comments	Object	Support
7	0	7	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25693	Anglian Water	Generally supportive of policy although we suggest that the policy be amended to include a positive reference to the provision of SuDS, with connections to public sewer being last resort and specific reference to the risk of sewer flooding.
25943	Environment Agency	Policy DM4 - Development and Flood Risk. The SFRA is again mentioned here and needs to be updated to remain useful. Paragraph 9.43 refers to the suitability of different types of developments within the various flood zone classifications. It should be noted that the Flood Zones will have changed and the outline of Flood Zone 3b may need to be updated. Plan 2 - Flood Risk, dated November 2018 maps the flood zone. This is different to our current flood maps. Our flood map for planning was updated on 31 January 2019.
25944	Environment Agency	Paragraph 9.44 refers to the Ipswich Level 2 SFRA providing the necessary information to help facilitate the sequential approach as outlined in the NPPF demonstrating the application of the sequential test is essential. We are currently reviewing the Sequential and Exception Test statement and will advise of any further work required.
25945	Environment Agency	We are pleased to see that paragraph 9.4.9 requires the production of site specific FRAs to include detailed flood modelling to ascertain flood risk. However, the paragraph also refers to the SFRA. As previously stated, you may wish to update your SFRA because there is new ENS (Essex Norfolk and Suffolk) Coastal Modelling 2018, to which site specific Flood Risk Assessments would have to refer to in line with paragraph 160 of the NPPF.
25946	Environment Agency	Paragraph 9.4.10 states that “FRAs for proposals in Zones 2 and 3 need to clearly state the frequency of flooding in and around the site and, until the EA’s flood defence barrier is implemented, will need to assume existing defences are in place”. This sentence is now no longer fully applicable as the tidal barrier is now complete and operational and should be updated accordingly. The paragraph should also consider residual risk.

25763	Natural England	We recommend that Policy DM4 includes a requirement for proposals to demonstrate that the method of surface water disposal will not have any adverse effect on European and nationally designated sites.
26010	Suffolk County Council	<p>Clarify that part b) means the countywide flood risk guidance as source of 'adopted standards'. Also clarify that 'wherever practicable' point refers to the application of SuDS standards, rather than the requirement to ensure adequate protection from flood risk. Support intent of clause (d) and keen to support measures which encourage water efficiency, but unclear how this criteria is intended to operate alongside the requirement in DM1.</p> <p>A discussion on the best policy mechanism for encouraging re-use of land drainage water recommended.</p> <p>Amend paragraph 9.4.8 to explain linkage between Plan, SPD and countywide guidance rather than paragraph 8.41.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy wording has been amended to emphasise that the preferred method of surface water disposal is through the provision of SuDS and to identify the risk of sewer flooding. This is in response to comments from Anglian Water which supported the policy generally but requested that SuDS are referenced more positively and that the policy is clearer in terms of preference. The inclusion of the additional criteria as worded by Anglian Water and the additional paragraph in the reasoned justification will address this matter.

The reasoned justification has been amended in light of the recent completion of the flood defence barrier which the Environment Agency have referred to in their comments.

The Council is in the process of updating its Strategic Flood Risk Assessment and this will feed into the Final Draft Local Plan when the results are published.

Plan 2 has been updated to take account of the 31 January 2019 flood map for planning released by the Environment Agency.

The policy wording of criterion a has been amended to specify that the SuDS are applied wherever practicable. This is in response to comments from Suffolk County Council. The revised wording will ensure that the requirement allows for developments to comply with the policy where the integration of SuDS may in exceptional circumstances not be practicable.

In contrast to the above, the policy wording of criterion b has been amended to remove reference to 'wherever practicable'. This is in response to comments from Suffolk County Council. The deletion of this wording from this is necessary because the need to adequately protect development from flooding is critical and there would not be circumstances where a development is acceptable and be inadequately protected from flooding.

The reasoned justification has been amended to specify what specifically the 'adopted standards' referred to in criterion b of the policy are. This is in response to comments from Suffolk County Council who explained that it would be helpful if the source of the 'adopted standards' could be clarified. The additional wording provides clarity on this point.

Paragraph 9.4.11 of the reasoned justification has been amended to specify that the need to accord with the Development and Flood Risk SPD relates to criterion c of the policy. This is in response to comments from Suffolk County Council who explained that it would be helpful if the source of the 'adopted standards' could be clarified. The additional wording provides clarity on this point.

It is acknowledged that Suffolk County Council have asked how criterion d regarding water efficiency operates alongside the requirement in Policy DM1 for dwellings to meet the optional technical standard for water efficiency. The inclusion of a need for water efficiency generally in DM4 is to ensure that water efficiency is included and considered as part of the broader mitigation response for development and flood risk and not solely about water-saving from a sustainability perspective. In addition, the specific residential requirement in DM1 does not apply to non-residential developments. Therefore, it is important that a requirement is maintained in DM4 to safeguard a policy mechanism to achieve water-efficiency, albeit to less specific amounts than residential, in non-residential developments.

The County Council's request for a discussion on the best policy mechanism for encouraging re-use of land drainage water is noted. Officers at Ipswich Borough Council are receptive to this and are in the process of this discussion. However, as the Borough Council is proposing a mechanism for encouraging the re-use of land drainage water, this discussion is not likely to result in any significant material changes to the policy wording and consequently does not prevent the progress of the Local Plan at this stage.

An additional criterion has been included to require development to demonstrate that it does not have any adverse effect on European and Nationally designated sites in terms of surface water disposal. This is in response to the recommendation made by Natural England. The Council has a duty to adhere to the requirements of the Water Framework Directive, by way of the Anglian River Basin Management Plan, and, to comply with the provisions of the Conservation of Habitats and Species Regulations 2010 (as amended). The inclusion of this additional criteria will provide additional protection for European and Nationally designated sites.

It is acknowledged that comments have been raised by the Environment Agency on other policies regarding the potential contamination risk from infiltration SuDS. Although comments weren't made on this policy specifically, the change has been made here as it is the most effective mechanism to address this concern.

40.DM5 – Protection of Open Spaces, Sport and Recreation

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25620	Suffolk Wildlife Trust	We are concerned that this policy fails to consider the potential ecological impact of the loss of open spaces, sports and recreation areas. Any such proposal should include assessment of such impacts and should follow the mitigation hierarchy to avoid, mitigate or compensate the impact.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25730	Sport England	Sport England supports a policy aimed at protecting existing open spaces and sport and recreation sites. We have concern that the reference to sites of low value and poor quality could encourage site owners to allow sites to fall into disrepair, as poor quality in itself does not mean there is no demand for a facility.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy wording has been amended to include reference to the demand of an open space or facility. This is in response to comments from Sport England which identified a loophole in criterion ‘a’ of the policy wording. The inclusion of this additional wording is to ensure that sites which, if otherwise well-maintained, would help to meet local open space, sport or recreation need are not deliberately neglected to lower their demand due to their deteriorated quality. The inclusion of this will ensure that open spaces, sport and recreation facilities which, if well-maintained, would meet demand by local communities are not lost by way of deliberate neglect. Local demand will depend on the amount and quality of alternative provision available in the wider area. For example, a sports facility that is the only facility at a regional level will need to consider a wider catchment than that of a smaller facility which is provided throughout the Borough. A supporting paragraph in the reasoned justification has also been added to this effect.

The policy has not been amended to include reference to the potential ecological impact of the loss of open spaces, sports and recreation areas. This was requested by the Suffolk Wildlife Trust. This has not been included because the consideration of potential ecological impacts of development, including losses of open space, sport and recreation areas, is adequately managed by Policy DM8. In circumstances where there is a loss of open space, sport and recreation facility, the criteria of Policy DM8 would apply. As a result, it is not necessary to include this into Policy DM6 which is targeted at establishing the principle of the loss of these uses. However, it is accepted that the relevance of addressing the mitigation hierarchy in relation to all development is not clear in policy DM8 and, therefore, it is proposed to move the relevant text to the introductory paragraph of DM8.

41.DM6 – Provision of New Open Spaces, Sport and Recreation Facilities

Representations	Comments	Object	Support
7	0	5	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25762	Natural England	Support this policy. Recommends that large developments include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site. The Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in

		designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards. Recommend six features for provision.
25989	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 1: Every Child in Suffolk has the best start in life.</p> <p>As set out in this letter, our authorities will work together to ensure that sufficient choice of school and pre-school places are provided to meet demands arising from development. The Plan also promotes safe and sustainable travel, and access to green space. Policies CS16 and DM6 are key in this regard, with the Public Open Space SPD setting standards in respect of formal and informal recreation and play – which are key in a child’s development.</p>
26011	Suffolk County Council	<p>Supporting text on open space proportions (paragraph 9.6.2) suggests specific proportions of sites for green space and notes that this space can contribute to part of a site's SuDS provision. This is helpful but it should be noted that, on some sites, 10% or more of the site area may be required for SuDS provision alone.</p> <p>County would appreciate a discussion regarding the relationship between open space and highway design. Need to consider how planting relates to highway design and maintenance requirements, and opportunities for future widening. May be a matter for forthcoming design guidance, rather than local plan directly.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25731	Sport England	Sport England supports this policy which seeks to secure new opportunities for sport and recreation. We also support the flexible approach to on-site or off-site provision.
26107	Suffolk Constabulary	The provision of new open space must comply with the relevant SBD guidance, in particular

		reference to having clear boundaries between public and private spaces, not to immediately abut residential areas, to avoid locating such facilities at the rear of dwellings, to ensure that small children's play areas can be made secure at night and to ensure that the provision of any informal spaces aimed at young people is only done following formal consultation with the DOCO.
25621	Suffolk Wildlife Trust	Whilst paragraph 9.6.7 recognises that green spaces should provide wildlife habitats as part of the wider ecological network, this does not appear to be included as part of policy DM6. The policy should include the requirement for new open spaces, sport and recreation facilities to provide ecological enhancements as part of their design and implementation, in order to create multi-functional spaces which are of value to people and wildlife.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25823	Cardinal Lofts (Mill) Ltd	The Company's comments, in respect of this policy, follow on from those set out above in relation to Policy CS16. The Company again offers its general support to the objectives of the policy but considers that it needs to be more explicit in recognising that, on higher density, previously developed, sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council's standards.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy wording has been amended to include a requirement to consider Secured By Design and apply the principles where appropriate. Good use of urban design principles may well overcome Secured by Design issues by other means. This is in response to comments from Suffolk Constabulary. A new paragraph has been inserted in the reasoned justification to provide further clarification on the issues relating to Secured By Design that will need to be considered. This has been included to ensure

that safety and security are integrated into the provision of new open spaces and facilities.

The ‘Nature Nearby’ standards are referenced in paragraph 9.6.8. Consequently, it is not necessary to amend the policy or reasoned justification to make applicants aware of these standards.

The policy sets a preference for on-site open space, sport and recreational facilities. Subsequently the recommendation of Natural England for this provision to be on-site to minimise pressure to designated sites is sufficiently addressed. Where it is not possible to incorporate provision on-site, the Council will expect off-site contributions to other areas or facilities within walking distance of the site.

The policy does not include specific standards for Strategic Accessible Natural Greenspace (SANG). Paragraph 9.6.8 explains that the Council will aim to address any deficits in SANG where it can be achieved through also meeting the local standards for natural and semi-natural greenspace. It is therefore not considered necessary to make explicit requirements for SANG as this will be delivered in cohesion with natural and semi-natural greenspace.

A distinction between the 10% public open space requirement and the provision of SuDS specifically has not been included. Where SuDS occupies 10% or more of a development and is part of the public green space then the circumstances of whether it is feasible to compensate this at the expense of another typology can be applied on its merits. This is set out in the fourth paragraph of the policy. Consequently, the need to include SuDS which may occupy 10% or more of the site area will not automatically override the provision of alternative typologies.

The relationship between highways design and open space design has not been included as part of this policy. As referenced by Suffolk County Council, this will be more appropriately addressed as part of the Suffolk Design Guidance.

Policy DM6 has not been amended to give explicit recognition of the deliverability of full provision for open space being challenging in high-density developments. There will be allowances for high-density schemes in terms of the inclusion of on-site open enhancements as the policy allows for a scheme’s development viability to be considered and for alternative off-site provision to be provided where space is limited.

42. DM7 – Provision of Private Outdoor Amenity Space in New and Existing Developments

Representations	Comments	Object	Support
3	0	3	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26108	Suffolk Constabulary	9.7.6 further definition of iii) high standards of security and privacy is required to state that generally rear gardens should be bounded by fencing (usually close board or welded mesh) at least 1.8 m high. Further that clear delineation of public and private space should be made at the front of the dwelling. 9.7.10 Private communal gardens need to be accessible only to residents;

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25793	Home Builders Federation	We could not find any evidence to support the level of private outdoor space being proposed in this policy. The size of any private outdoor space should be left to the discretion of the developer who are aware of the demands of their customers. The approach taken by the Council could potentially reduce the amount of land available for housing in what is a very constrained borough. Therefore, we would suggest that whilst we accept that some private outdoor amenity space will be required the Council should not set out minimum specifications for such space.
25824	Cardinal Lofts (Mill) Ltd	As with the comments relating to Policies CS16 and DM6, there should be explicit recognition that, in respect of high density, previously developed, sites, it may not always be possible to make full provision for private amenity space to accord with the Council's standards.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Paragraphs 9.7.6 and 9.7.10 of the reasoned justification for this policy have been amended to include further details on security and privacy as requested by Suffolk Constabulary. This is to take account of the latest advice in the Secured By Design Guide (March 2019).

The minimum private outdoor amenity space standards have not been amended or removed. The standards set out in adopted Local Plan (2017) Policy DM3 are not proposed to be amended under this Local Plan Review. The adopted standards were deemed sound at the time of adoption which was in the context of the previous National Planning Policy Framework (NPPF) (2012). Neither the previous (2012) or current (2019) NPPF included minimum standards for outdoor amenity space. However, most local planning authorities do stipulate a minimum size, which varies between authorities. For example, the Essex County Council Design Guide stipulates minimum garden sizes for most types of houses. The adopted Local Plan (2017) standards were also informed by an analysis by the Essex Design Initiative to demonstrate that the target densities could be achieved with these outdoor amenity standards being met. Overall, the minimum garden standards used in the adopted Local Plan (2017) are still considered to be sound and justified and subsequently no removal or amendment of these is necessary under this Local Plan Review.

43.DM8 – The Natural Environment

Representations	Comments	Object	Support
11	0	11	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25947	Environment Agency	DM8 - The Natural Environment- should be refined to say that "Sites of Special Scientific Interest (SSSI) will be protected from development". Similarly, the policy wording for the planning permission section should be strengthened to state that "planning permission will not be granted for development that would result in damage or loss in extent or otherwise have significant adverse effect on Local Nature Reserves or Local Sites".
25948	Environment Agency	Policy DM8 - The Natural Environment - the sixth paragraph should be strengthened to say "Enhancements for protected sites and protected and priority species will be expected from new development". The wording of the final paragraph in the policy should be strengthened to say "Within the buffer zones around core areas and corridors, development will be required to enhance the ecological networks through measures such as wildlife beneficial landscaping".
25949	Environment Agency	DM8 - The Natural Environment. The wording of the final paragraph in the policy should be strengthened to say "Within the buffer zones

		around core areas and corridors, development will be required to enhance the ecological networks through measures such as wildlife beneficial landscaping".
25950	Environment Agency	The policy should include reference to Biodiversity Net Gain. The Defra 25 Year Plan (2018), available here https://www.gov.uk/government/publications/25-year-environment-plan , includes a policy to embed the 'environmental net gain' principle for development. This will enable development without increasing overall burdens on developers. The planning system should provide biodiversity net gains where possible as required in NPPF paragraph 170.
25951	Environment Agency	Paragraph 9.8.7 could be enhanced by making reference to the river corridor, preferably in a standalone paragraph, describing how new development along the river corridor will be required to enhance the biodiversity value of the riparian zone and ensure water quality is protected and enhanced.
25764	Natural England	Support this policy. We highlight the importance of measurable net gain in the creation of habitat and improvements to biodiversity and refer you to the Defra 25 YEP and paragraph 174 of the National Planning Policy Framework We advise that Policy ISPA3 is referenced in Policy DM8 as it affords the protection of designated sites by providing a mechanism to offset recreational disturbance impacts.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25858	Ravenswood Environmental Group	The policy causes a conflict with the allocations policies because the allocations will have an adverse impact on European Protected sites. The huge housing and industrial development at Ravenswood could be located on an alternative site that would cause less harm to the SPA so Policy DM8 mandates that the Ravenswood development should be refused. The plan therefore unreasonably allocates land for development whilst including policies which would see that development rejected.

25776	RSPB	<p>We support the measures to enhance conditions for biodiversity.</p> <p>The text relating to European (Natura 2000) sites under Sites of international and national importance does not correctly capture the step-wise process of the Habitats Regulations. The reference to 'in-combination effects' should remain (not marked as deleted); it is silent on the 'absence of alternative solutions' and should refer to compensatory measures that would be required should IROPI be concluded.</p> <p>Paragraph 9.82 - line 2: Add Birds and Habitats Directive line 10: Amend to 2017 (from 2010)</p>
25622	Suffolk Wildlife Trust	<p>We support the intentions of this policy. However, the text in relation to SSSIs does not appear to be compliant with NPPF paragraph 175(b).</p> <p>The Priority Habitats and Species sections must also include reference to development delivering ecological enhancements as part of their design and implementation. Enhancements for species such as swifts and hedgehogs should be secured as part of new residential developments.</p> <p>The intention in the final sentence to encourage development to enhance the ecological network where possible is not supranational enough. All new development should deliver ecological enhancements as per the NPPF (paragraph 170(d)).</p>
25630	Suffolk Wildlife Trust	<p>Paragraph 9.8.3 states that there are 19 County Wildlife Sites in the Borough, however policy CS4 states that there are 20. This should be checked for consistency.</p>
26139	Suffolk Wildlife Trust	<p>Paragraph 9.8.2 makes reference to the Conservation of Habitats and Species Regulations, it should be noted that these regulations were updated in 2017 and references to them should be amended accordingly.</p>

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The reasoned justification has not been amended to include reference to enhancing the river corridor. This is in response to the Environment Agency's request. The Council consider that the enhancement of the river corridor as a policy mechanism would sit better under Policy DM10 (Green Corridors). As a result, DM10 has been amended but not DM8.

The policy wording of the Local Nature Reserves and County Wildlife Sites section has been amended to insert the term damage in addition to loss. This is in response to the Environment Agency. This is to afford appropriate protection to the aforementioned sites.

It was not deemed suitable to remove the reference to "unless the harm can be mitigated by appropriate measures" from the policy wording of the Local Plan. The NPPF Paragraph 175 (a) states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. As a result, removing the ability to mitigate harm would be inconsistent with the NPPF.

The policy wording relating to SSSIs has not been amended. The Council considers the policy as worded originally affords greater protection as it allows the indirect impact of development to be considered. The Environment Agency's proposed wording could be interpreted narrowly in terms of direct impacts only.

The policy wording has been amended to delete references to 'encouraged' and 'where possible' in relation to enhancing ecological networks. This is in response to the Environment Agency's recommendation and also reflects the requirement for net gain to biodiversity in the revised NPPF (2019) and the general objectives of the Government's 25 Year Environmental Plan (2018).

The opening sentence of the policy wording has been amended to explicitly state the need to provide net gains for biodiversity. This is in response to the revised NPPF (2019) which requires planning policies and decisions to minimise impacts on and provide net gains for biodiversity. This in contrast to the original NPPF (2012) which included a caveat of 'where possible'. The adopted wording for Policy DM8 included 'expected' which no longer accords with the national policy position and so has been amended accordingly to 'must'. In addition, the previous wording of 'enhance conditions for' has been amended to shadow the wording of the NPPF (2019) more closely. Paragraphs 9.8.5 and 9.8.7 of the reasoned justification has been amended to set out the national position of the Government.

The reasoned justification has been updated to include reference to the need to improve biodiversity and not just halt the overall decline. This is in response to the Government's 25 Year Environmental Plan (2018) and Environmental Bill (2019) as this now forms part of the national objective for the environment.

The policy wording has been revised to strengthen the requirement to enhance protected sites and protected and priority species. This is in response to the Environment Agency. In addition, the change from 'expected' to 'required' has been undertaken to reflect the update to the NPPF (2019) which states that plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

The reasoned justification has been amended to cross-reference to Policy ISPA3 as this is the policy for affording the protection of designated sites by providing a mechanism to offset recreational disturbance impacts. This is in response to comments from Natural England.

The policy wording has been revised to separate protected and priority species from protected sites. This is because the new NPPF (2019) has placed greater emphasis on securing measurable biodiversity net gains in terms of protecting and recovering priority species (paragraph 174(b)). The previous wording of the Policy DM8 only sought enhancements for protected and priority species 'where possible'. As the new NPPF introduces stricter requirements for biodiversity net gains, it was deemed appropriate to include a requirement for development to support this. In addition, the RSPB (See DM15) and Suffolk Wildlife Trust also advocated a requirement to this effect.

The need to enhance protected sites only 'where possible' has been retained. This is because, unlike protected and priority species, there will be instances where development is not close to any protected sites and so enhancing these may not be feasible or relating to the site itself. Therefore, it would not be reasonable to require this in all instances. In contrast, opportunities to enhance protected and priority species would be possible on all sites, regardless of their location.

The policy wording in relation to European protected sites has been amended to reinstate the 'either alone or in combination with other proposals' into the policy. This is to capture the requirements of the Habitats Regulations (2017), specifically Stage 1 (screening) of the Habitats Regulations Assessment (HRA) which states that "To test whether a plan or project either alone or in combination with other plans and projects is likely to have a significant effect on an international site." This was also flagged by the RSPB in their comments. The revised wording will provide greater alignment between the policy and the Habitat Regulations.

The reasoned justification has been amended to update the dates and titles of relevant legislation.

The policy is not considered to cause a conflict with the allocations policies in respect of Ravenswood and an adverse impact on European Protected Sites. The allocation of land at Ravenswood for development establishes the principle of development and

uses that may come forward on these sites. It cannot be assumed that development in principle would have an adverse impact on the nearby European Protected Sites. Ultimately, it will be the role of the applicant of any future planning applications on these sites to demonstrate that there is no adverse impact on European protected sites, and, if there is, that it cannot be located on an alternative site as per the requirements of the Habitats Regulations (2017).

Reference to habitat creation, restoration or connection of fragmented habitats has been added to the supporting text to Policy DM8 in order to reflect options for larger developments as required by the HRA.

The policy text has been updated to ensure applications are accompanied by up-to-date ecological reports and survey data. In some instances, there will be national or species-specific guidance on this, however in circumstances where such advice does not exist, the plan requires developers to accord with CIEEM guidance. This change is in response to comments from Suffolk Wildlife Trust, received in the context of the updated Ipswich Wildlife Audit.

44. DM9 – Protection of Trees and Hedgerows

Representations	Comments	Object	Support
3		2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25765	Natural England	Natural England fully supports policy requirements to protect and enhance the natural environment, including green infrastructure and ecological networks and to ensure development design contributes towards local biodiversity. We would support a requirement for all development to contribute biodiversity net gain, in accordance with the NPPF and Defra YEP, wherever possible.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25777	RSPB	Support the positive intent to increase tree canopy cover in the borough.

The following made no comments in response to this issue.

**Parish and Town Councils
Developers and Landowners
Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

Paragraph 9.9.1 of the reasoned justification has been amended to include reference to the role that trees can play in management river climate. This was suggested by the Environment Agency. The revised wording is considered to highlight the role of trees and managing river climate.

Paragraph 9.9.5 of the reasoned justification has been revised to insert an additional bullet point to support retaining existing and plant new riparian trees where possible. This is in response to the request of the Environment Agency. The previous considerations for trees that were outlined did not explicitly reference riparian trees and thus this is considered to emphasise their importance.

The requirement for all development to contribute to biodiversity net gain has been incorporated into the policy changes to Policy DM8 (The Natural Environment). This is the appropriate policy mechanism to capture this.

45.DM10 – Green Corridors

Representations	Comments	Object	Support
6		4	2

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26029	Sproughton Parish Council	The Council especially liked the new Green Corridor Policy which includes the river corridor J for the River Gipping. It is also positive that you are encouraging people to walk and spend time along the river through this policy which is important to this Parish.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25766	Natural England	Natural England fully supports policy requirements to protect and enhance the natural environment, including green infrastructure and ecological networks and to ensure development design contributes

		towards local biodiversity. We would support a requirement for all development to contribute biodiversity net gain, in accordance with the NPPF and Defra YEP, wherever possible.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25799	AONB	The AONB team fully support the aspiration to create a green rim round the periphery of Ipswich borough. As well as providing an ecological link for wildlife, such an asset can provide opportunities for commuting, recreation and help encourage active live styles. Such a network can also alleviate pressure on more sensitive coastal European sites. A similar project exists in Colchester; the Colchester Orbital - which may be useful for the emerging Green Rim project in Ipswich
25632	Suffolk Wildlife Trust	Policy DM10 and Plan 6 set out the green corridors through the town, linking out to the surrounding areas. We note that the policy and plan also include a blue corridor along the River Gipping from the Wet Dock to the edge of the Borough. We query why this corridor is not shown extending east and then south along the Gipping and in to the River Orwell? This whole stretch is designated for its nature conservation value (including Special Protection Area, Ramsar site, SSSI and Country Wildlife Site) and forms an important corridor within and out of the town.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25937	Ashfield Land Limited	The wording of DM10 must be carefully considered. For example, reference to Plan 6 shows that land to the north of Whitton Lane is included as part of the green rim. This land is also allocated for employment use. This demonstrates that, if applied too literally, DM10 could conflict with other key allocations. It is clear in certain cases (Whitton Lane) that

		there will be limited opportunities for the site to contribute to the creation of a green rim. The policy should recognise that the application of the green rim policy must take account of other proposed and permitted uses.
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The following made no comments in response to this issue.

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy wording and reasoned justification in relation to development close to river banks has been amended. This is in response to the request from the Environment Agency. The new policy wording for development to consider appropriate tree planting and an ecological buffer along the river accords with the Ipswich River Strategy. The 10m distance was arrived at following discussions with the Environment Agency and the reasoned justification has been amended to outline this parameter. Overall, the revised policy wording and reasoned justification will help enhance the ecological quality of the blue corridor in Ipswich.

The wording of this policy has not been amended to include an explicit requirement for biodiversity net gain wherever possible. This is in response to comments from Natural England. Policy DM10 is positively worded and seeks to enhance biodiversity in the green corridors and the Council is supportive of seeking biodiversity net gain in accordance with the provisions of the NPPF. However, it is considered that the explicit requirement (rather than the implicit requirement in DM10) is best served as a policy mechanism specifically in Policy DM8 (The Natural Environment).

Plan 6 has been updated to show the broad route of the River Corridor up to the Waterfront area. This is in response to the request from Suffolk Wildlife Trust. The updated map will clarify that the extent of the River Corridor extends further than may have been interpreted by looking at the plan.

It is accepted that in exceptional circumstances there may be instances where opportunities to contribute to the creation of the green trail may be limited. This is reflected in the policy wording where it states that green links will be sought wherever safe and practicable.

46.DM11 - Countryside

Representations	Comments	Object	Support
3	0	2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25768	Natural England	Natural England welcomes inclusion of a policy requirement to ensure the protection of the Suffolk Coast and Heaths AONB in accordance with paragraph 172 of the NPPF.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25801	AONB	Amend paragraph 3 of this policy as follows: In the case of the AONB, major development will only be permitted in exceptional circumstances in accordance with NPPF paragraph 172. The Natural Beauty landscape and Special Qualities of the AONB should be conserved and enhanced.

Members of the public

Rep. ID. No.	Respondent	Summary
25631	Alice Martin	Should make reference to footnote 55 which states that what is considered to be major development within an AONB is different to the normal definition of major development.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy wording of the AONB section of the policy has been amended to include reference to the enhancement of the AONB and in defining the AONB. This is in response to the request made by the AONB Unit. The revised wording offers greater consistency between the policy and paragraph 172 of the NPPF (2019).

The policy wording has been amended to clarify that major development in the AONB has a different definition to that of common major development. This is in response to the point raised by the Private Individual. Paragraph 9.11.3 of the reasoned justification has also been amended to provide further explanation as to how this definition differs. The changes ensure that the policy is sound as it complies with Paragraph 172 of the NPPF.

47.DM12 – Design and Character

Representations	Comments	Object	Support
13	0	13	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26050	Historic England	We welcome the policy commitment to the special character and distinctiveness of Ipswich, including significant views. We welcome paragraph 9.12.10 referring developers to the relevant evidence base. We appreciate the wish not to repeat conservation area appraisals etc within the plan but including what this means for Ipswich would make this section more locally specific.
25767	Natural England	Natural England fully supports policy requirements to protect and enhance the natural environment, including green infrastructure and ecological networks and to ensure development design contributes towards local biodiversity. We would support a requirement for all development to contribute biodiversity net gain, in accordance with the NPPF and Defra YEP, wherever possible.
25544	Suffolk Fire & Rescue Service	Suffolk Fire & Rescue Service do not envisage additional service provision will need to be made in order to mitigate the impact of the planned development. This may need to be reconsidered if service conditions change. SFRS will not have any objection with regard to access, as long as access is in accordance with building regulation guidance. We will wish to have included adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.
25546	Suffolk Fire & Rescue Service	As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient.
25978	Suffolk County Council	Council should consider including requirement/encouragement for development to promote

		<p>local heritage and distinctiveness. The policy does require protecting and enhancing heritage assets, but design can also reflect heritage which may not be visible, or which may no longer be present. Additionally, through the provision of information boards or signage, development can contribute to understanding of the town and its heritage. County would appreciate a discussion regarding the relationship between open space and highway design. Need to consider how planting relates to highway design and maintenance requirements, and opportunities for future widening. May be a matter for forthcoming design guidance.</p>
25991	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 2: Improving independent life for people with physical and learning disabilities: Policy CS5 refers to accessibility in respect of transport but does not directly refer to the varying needs of the population as a whole apart from in supporting text. Should consider moving this requirement into policy - to complement DM12.</p> <p>The requirement that 25% of new dwellings meet the M4(2) requirement (Policy DM12) is supported.</p> <p>Could also set a policy requirement that some sites include specialist housing for those with physical or learning disabilities as part of their overall housing mix.</p>
25992	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 3: Older people in Suffolk have a good quality of life:</p> <p>Support the 25% of new homes meet the M4(2) requirement. Would support a higher percentage.</p> <p>Should consider a policy which guides new development to consider ageing as a design issue. E.G. Dementia Friendly Design as a requirement for new development as it would benefit not just those suffering from cognitive impairments but would also respond to the ageing population.</p> <p>Should also consider the allocation of specialist housing for older people, perhaps as part of the overall housing mix on larger sites.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25803	AONB	Should this policy reference the emerging Suffolk Design Guide?
25884	Associated British Ports	Supportive of IBC's desire for all new development to be well designed and sustainable, for 25% of new dwellings to be built to Building Regulations standard M4(2), and for proposals to respect the special character and distinctiveness of Ipswich including ensuring good public realm design. However, this should not be at the expense of development viability and the policy should be applied flexibly in the context of the objective to achieve sustainable regeneration.
26134	Ipswich and East Suffolk Clinical Commissioning Group	We would support a design policy that promotes social inclusion, particularly for the ageing population and provides easy access to local services, without the use of a private vehicle. We would also request that consideration is given to design of access within new developments for blue light services.
26778	RSPB	Suggested alternative wording, consistent with other points raised: Provision to support biodiversity should include measures such as nestboxes for birds (swifts, house sparrows, starlings) and bat boxes integrated in to the fabric of the building.
25732	Sports England	Sport England supports this policy which seeks to establish attractive and safe areas of public realm that encourage people to use them for formal and informal activity. Sport England have published 'Active Design' which gives advice on how to make environments attractive and encourage physical activity. We would welcome reference to this document in the supporting text to this policy.
26109	Suffolk Constabulary	The Council has committed to creating safe and secure communities and this should be reinforced by requiring that all new and refurbished developments must comply with the relevant SBD guide (as opposed to the current statement that consideration be given to it). Section a should be amended thus 'help

		<p>create safe and secure communities by complying with the relevant Secured By Design guide.' This policy should also highlight the broader elements of designing out crime, beyond lighting and CCTV. See full text for suggested wording as a replacement to paragraph 9.12.</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Data from Sport England’s Active Design report shows that only 14.29-17.94% of adults in Ipswich participate in 30 minutes of sport and active recreation on three or more days a week. In light of which the Council is keen to adopt Sport England’s Active Design Guidance. The guidance outlines the issues that need to be considered in the master planning of new developments to encourage communities to be naturally active as part of their daily life by promoting physical activity, walking and cycling. Paragraph 9.12.11 now focuses on sustainable travel and active design and makes specific reference to the Active Design Guidance published by Sport England. Reference to the need for provision for the recycling of waste materials has been removed from paragraph 9.12.11 but remains in 9.12.17.

Changes have been made to policy DM13 to provide a more local context. A link has also been made to DM13 and DM14 in policy DM12.

The policy has been amended to include reference to biodiversity net gain. However, It is considered that the explicit requirement for biodiversity net again is best served in Policy DM8 The Natural Environment.

Policy DM12 has been amended to require development to promote local heritage and distinctiveness, however it is considered that the requirement is best served though policy DM13 Built Heritage and Conservation. The Council agree that tree planting and maintenance along the highway should be a matter for the Suffolk Design Guide.

The percentage of new homes complying with the Building Regulations Standard M4(2) is considered sufficient to meet the needs of the local population based on data from the Suffolk Housing Survey.

Ipswich is committed to becoming a dementia friendly community. The Office for National Statistics predicts the population for the over 65 age group is set to increase by 59.7% between 2014 and 2039 across Suffolk. The RTPI’s recent Dementia and Town Planning Document and the Alzheimer’s Society state that nationally there are currently 850,000 people living with dementia in the UK. This is set to increase to 1

million by 2021 and to 2million by 2051. It is therefore important that the design of the built environment caters for people throughout their lifetime and is suitable and accessible for people regardless of age, mobility or disability. The policy establishes the considerations against which residential developments will be considered, to provide for the needs of the most vulnerable in our society.

Integrated nest boxes require no ongoing maintenance and repair and are supported by the RSPB.

The Council is committed to reducing anti-social behaviour and crime and acknowledge that the planning system can play an important role in ensuring appropriate measures are in place in relation to crime prevention and security. The policy has therefore been amended to take account of comments from Suffolk Constabulary. However, in some cases design solutions are not complaint with designing out crime guidance but meet the objective of the guidance. Hence the Council has added 'where appropriate to do so' to the changes suggested.

The Council consider it premature to refer to the emerging Suffolk Design Guide, given that the document has not been through public consultation.

48.DM13 – Built Heritage and Conservation

Representations	Comments	Object	Support
3	0	3	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26051	Historic England	Recommend that Local List is expanded to cover other types of undesignated heritage assets or where documented in conservation area appraisals it's highlighted in policy terms. The repetition of the NPPF tests in the second and third paragraphs should be reviewed as they refer to all heritage assets. Wording must be consistent with paragraphs 194, 195, 196, and 197. Alternative is to refer in policy that the tests on harm in the NPPF will be followed. Grammar error. Consideration to incorporating requirements in supporting text into policy such as what the requirements are for a heritage statement etc.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26110	Suffolk Constabulary	In order to ensure that listed buildings are not allowed to suffer repeated damage or unauthorised access, it is recommended that paragraph 9.13.17 is amended to include the following 'In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency and security of those buildings....';

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25826	Cardinal Lofts (Mill) Ltd	The Company supports the general objectives set out in this policy, but considers that it should be re-worded, particularly in respect of the tests relating to harm caused to heritage assets, to better accord with the wording set out in the NPPF. In particular, the three criteria relating to listed buildings do not include a balancing exercise, whereby harm caused is weighed against any public benefits arising from a scheme.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The changes to this policy have been included because of the non-compliance of the existing DM13 in the preferred options version of the emerging Local Plan with the 2019 NPPF. In addition, reference is made to relevant SPD to provide a more local context as well which has been a criticism made by Historic England regarding the older policy. A link has also been made to DM13 as archaeology is also considered as heritage assets and reference is made to this in the policy. This is because the treatment of archaeology (an important aspect of the local character and distinctiveness of Ipswich), merits a separate policy.

New text has been added on the requirement for a Heritage Statement, to ensure that developers are clear on the level of information expected in a submitted Heritage Statement and to reinforce that Heritage Statements need to be relevant proportionate and appropriate to the proposal being submitted.

The changes proposed have been prepared positively in line with the National Planning Policy

49.DM14 – Archaeology

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26052	Historic England	We would expect to see clear provision in policy for non-designated heritage assets of archaeological interest which are demonstrably of significance to scheduled monuments.
25979	Suffolk County Council	DM14 is the main policy for managing the process of consideration of archaeology and the County Council would welcome the opportunity to discuss the policy wording further. The supporting text could also usefully make reference to the Scheduled Ancient Monuments.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy has been amended significantly in light of discussions with the Suffolk County Council Archaeological Unit.

Ipswich Borough Council wish to protect and enhance the distinctive heritage assets of the area. The Council recognises that Heritage assets are non-renewable resources, intrinsic to the character and ‘sense of place’. The Local Plan should offer recognition and additional protection to non-designated heritage assets, the new policy text does this.

It is proposed to update the supporting text to clarify the importance of the archaeological deposits which underlie Ipswich. Ipswich has a rich archaeological

heritage and is of international importance because of its status as one of only four Middle Saxon ‘emporia’ or ‘wic’ sites in England. For continuity, the new text is taken from the introductory chapter of the Ipswich Archaeology Supplementary Planning Document (SPD) published in February 2019.

50.DM15 – Tall Buildings

Representations	Comments	Object	Support
4	0	4	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26053	Historic England	The policy and supporting text as currently drafted includes a definition by which The Winerack could be taken as a baseline for defining a tall building in Ipswich. This is counter to the historic building heights within Ipswich. We also are concerned that the tall building arc identified on the IP-One Policies Map includes a significant area within the setting of grade I Willis Building. We would be happy to discuss this further with you prior to the next iteration of the Plans.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25885	Associated British Ports	ABP welcomes IBC's policy on tall buildings consistent with its desire to secure high density development in the town centre and Waterfront (para 6.20 and Policy DM23). As presently drafted, the policy and supporting text do not make it sufficiently clear whether the Island Site is considered appropriate for tall buildings, or whether tall buildings in this location would be appropriate where they meet the criteria of Policy DM15 and where development viability justifies it. ABP requests clarification on this point.
25779	RSPB	At the Issues and Options stage, we made a representation (24740) to include a further line: k) to incorporate integrated swift-bricks. We respectfully ask that this is included. Swift-bricks are inexpensive (c£20) and their

		<p>inclusion will benefit a species that has undergone rapid decline within urban environments in the last 25 years. Such wording is not without precedent. The Hackney proposed submission local plan (Policy LP47d) asks that "all development proposals with an eaves height of 7 metres and above are required to provide nesting boxes for swifts..."</p> <p>We consider that this additional simple measure will provide further enhancement.</p>
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25825	Cardinal Lofts (Mill) Ltd	<p>Whilst the Company generally supports the policy, it is noted that Site IP035 is excluded from the 'arc of land', where tall buildings may be appropriate.</p> <p>This may not be significant/ material, as a 'tall' building is defined as one which is substantially taller than its neighbours or which significantly changes the skyline. In, this respect, there are buildings of between 7 and 15 storeys adjacent to the southern boundary of the site.</p> <p>If the development of IP035 would be subject to this policy however, then an objection is raised to the exclusion of the site from the arc.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Criterion 'a' has been amended to include reference to heritage assets for clarity. The reasoned justification does confirm that the impact on heritage assets will be taken having regard to the National Planning Policy Framework (NPPF) and the Planning (Listed Buildings and Conservation Areas) Act 1990. However, it was felt appropriate to set out this expectation within the policy wording to provide greater clarity.

Paragraph 9.15.2 has been amended to delete 'and /' in defining tall buildings. This is in response to concerns raised by Historic England as they have argued the current definition could be argued to use the Winerack as the baseline for defining a tall building. Although the use of and/ or for the two scenarios (taller than their neighbour

and/ or which significantly change the skyline) does technically allow the decision-maker to apply this policy in circumstances where only one of the scenarios has been triggered, removing the 'and /' does provide greater certainty about the mechanism for defining tall buildings. The reference to the updated Historic England Tall Buildings Advice Note (4) (2015) has also been included.

In making the above changes, the concern regarding the tall building arc and the setting of the Grade I Listed Willis Building is considered to be addressed. This was a concern raised by Historic England. Through the application of this policy, policy DM13 (Built Heritage and Conservation) and the provision of the NPPF, the impact on the setting of Listed Buildings such as the Willis Building will be appropriately assessed. The retention of the Tall Building Arc does not outweigh the setting of any nearby heritage assets which will need to be appropriately assessed as part of any development proposals that come forward in the Arc.

The policy has been amended to include fire safety specifically in terms of building users as part of criterion C. This is to make clear that fire safety is a relevant consideration in the planning policy.

The additional criterion recommended by the RSPB for integrated swift bird boxes in the policy has not been included. This is because integrated swift boxes are capable of being integrated into developments of 4 metres or higher and subsequently limiting integrated swift boxes to tall buildings would be counter-productive. Following follow up discussions with the RSPB, it was agreed that this should instead be inserted into policy DM8 (The Natural Environment) to ensure that opportunities for this measure are not missed. Consequently, it is not considered necessary to add a criterion to policy DM15.

The Tall Building Arc has not been amended to include site IP035 (College Street) within the arc of land. This is because site IP035 contains and is immediately adjacent to a series of sensitive heritage assets and therefore it is unlikely that a building taller than those on the neighbouring arc of land to the south will be encouraged. The site is within Opportunity Area B (The Merchant Quarter) where buildings outside the tall building arc should be limited to generally low rise (3 storeys) with increased scale at focal points up to a maximum of 5 storeys, to reflect historic grain and scale. Overall, as this site is not considered appropriate for a tall building, it is not necessary to amend the tall building arc zone.

Similar to the above response, the tall building arc has not been amended to include site IP037 (The Island Site). The site is within Opportunity Area A (Island Site) where generally low to medium rise development (3, 4 and 5 storeys) is advised to maintain the essential character of the Wet Dock Conservation Area and protect significant views across from the outer edges of the Waterfront. Therefore, as this site is not

considered appropriate for a tall building, it is not necessary to amend the tall building arc zone.

51.DM16 – Extensions to Dwellings and the Provision of Ancillary Buildings

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26111	Suffolk Constabulary	Section d should be amended as follows ' would not adversely affect the residential amenity of occupants of nearby properties, particularly in terms of privacy, light, security or overbearing impact. A further section should also be added — i) it is built in accordance with SBD Homes guidance. Paragraph 9.16.2 refers to extensions being set back from the building line by four metres. There is a danger that this will create blind spots not subject to natural surveillance and this must be taken into consideration

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Ipswich has the highest number of criminal offences committed across the Ipswich Housing Market Area. The Council is committed to reducing anti-social behaviour and crime and acknowledge that the planning system can play an important role in ensuring appropriate measures are in place in relation to crime prevention and security. It is therefore proposed to amend clause d, to require extensions to dwelling houses and residential annexes to be designed in accordance with Secure by Design principles.

The Ipswich Local Plan includes a requirement for two storey and first floor side extensions to be set back behind the main front wall of a house by 4 metres to ensure the extension remains subordinate to the original dwelling house. Suffolk Constabulary consider that setting an extension back from the main building line could create a blind

spot, not subject to natural surveillance. The Council agree that in certain circumstances the requirement for a setback could leave a property vulnerable to criminal activity. The Council intend to amend the accompanying policy text to require schemes that include recesses to be designed to avoid providing the opportunity for anti-social behaviour or crime.

The Council require side extensions to maintain external access to the rear garden. The word ‘possibility’ doesn’t make it clear what the applicant will need to do. The amended text avoids ambiguity about the intention of the policy.

52.DM17 – Small Scale Infill and Backland Residential Developments

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26019	Suffolk County Council	The commitment to meeting adopted parking standards is welcomed, but we have experience locally of severance plots resulting in a loss of parking for existing dwellings. The policy could helpfully reflect this issue by stating (in part g) that development should meet parking standards and not lead to an unacceptable loss of parking serving existing dwellings.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The County Council have identified that the development of severance plots locally has resulting in a loss of parking for existing dwellings, resulting in increased pressure for on-street parking. Data from the Suffolk Guidance for Parking shows that although the level of car ownership has increased, the growth of traffic on the highway has not increased to the same level. This indicates that a greater number of vehicles are likely to be parked at the owner’s place of residence. The Council intend to amend Clause G of Policy DM17 to ensure the development of severance plots does not lead to an unacceptable loss of parking services for existing dwellings, placing added pressure onto an already densely utilised parking network.

53.DM18 - Amenity

Representations	Comments	Object	Support
3		3	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25699	Anglian Water	Anglian Water is generally supportive of the Policy DM18 but considers that it should be made clear that new development should not prejudice the continued operation of established uses in Anglian Water's ownership and that mitigation of amenity impacts is not feasible in all circumstances.
25954	Environment Agency	We welcome the reference to mitigation measures being required in regard to contamination in policy DM18 - Amenity. Paragraph 9.18.11 specifically refers to contaminated land and states that development on contaminated land can expose people to a wide range of potential health risks. This sentence should be enhanced by stating that it can also mobilise contaminants and cause pollution of controlled waters.
25955	Environment Agency	We are pleased to see paragraph 9.18.11 states that "applicants who wish to develop suspected contaminated land will be required to undertake a thorough investigation of the site to determine any risk". This could be further enhanced by adding that it will be required to undertake a thorough investigation to determine any risk to human health and controlled waters (including groundwater).

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Council is keen to avoid conflict between incompatible uses and will seek to ensure that existing and future uses can operate effectively without being in conflict with other sensitive uses such as housing. Policy DM18 was designed to provide

advice on this matter, however the representation from Anglian Water suggest that the existing policy text does not make clear that new development should not prejudice the continued operation of established uses. It is therefore proposed to amend the existing policy text to clarify that new development that would adversely affect the continued operation of established uses will not be permitted.

The Environment Agency have suggested two changes to the accompanying policy text. The proposed new text confirms the risks of developing on contaminated land and clarifies why an applicant will be required to undertake a contaminated land assessment. The Council is committed to ensuring that policies provide sufficient information and advice to guide applicants developing on sensitive sites. As such, the Council will amend the accompanying policy text to include the additional supporting information recommended by the Environment Agency.

54.DM19 – The Subdivision of Family Dwellings

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26112	Suffolk Constabulary	Section e should be amended thus — 'incorporates a secure front door for each unit of accommodation and provides an appropriate standard of residential amenity including secure windows, CCTV coverage of the communal entrances and provision for secure mail delivery.'

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Research suggests that those living in Houses in Multiple Occupation suffer from disproportionately high levels of crime. Suffolk Constabulary have suggested some specific physical security measures that may be used by the private rented sector to provide a safe and secure environment. However, rather than making reference to a limited number of specific measures, the Council intend to amend the supporting text to require developments to be designed to minimise crime and anti-social behaviour. This gives the Council the opportunity to recommend appropriate security measures to address possible threats relevant to that location. It also allows the Council to

respond to the most up to date information available from the police and other agencies about the nature of potential threats and suggest appropriate and proportionate security measures.

Reference to ‘secure’ in clause e has been included to ensure that security for subdivided dwellings is not compromised

The National Planning Policy Framework (NPPF) 2019 requires local plans to positively seek opportunities to meet the development needs of their area. It is good practice for policies to be positively worded unless a brief negatively worded policy would be clearer.

The Local Housing Need projections indicate that the total population of families with children in the Ipswich HMA is going to rise from 67,267 in 2018 to 72,765 by 2036. Therefore, in order to protect the existing small family housing stock, and to allow for adequate residential space standards in the proposed subdivided dwelling, the subdivision of existing properties of less than 3 bedrooms or 100sq.m will not be permitted.

55.DM20 (new policy) – Houses in Multiple Occupation

Representations	Comments	Object	Support
N/A	0	0	0

This is a new policy that was not consulted upon at the Preferred Options stage. It will be consulted upon as part of the Regulation 19 Final Draft Local Plan.

56.DM21 (formerly DM20) – Transport and Access in New Developments

Representations	Comments	Object	Support
4	0	3	1

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25612	Westerfield Parish Council	Westerfield Parish Council strongly support the policy DM21 and in particular paragraph 9.20.1 (now 9.21.1) where the Council is clearly committed to ensure that existing transport infrastructure is not adversely affected while determining planning applications.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26000	Suffolk County Council	<p>County recommend re-draft of policy to include:</p> <ul style="list-style-type: none"> - Requirement for maximisation of sustainable transport and safe access; - Indicative thresholds for documents in line with County guidance; - Need for assessments to include cumulative impacts; - Requirement to protect, enhance and connect to rights of way. - Consideration of school safety and routes; - Encourage car club facilities; - Clear framework requiring significant impacts to be limited and refused in certain circumstances. <p>Additional supporting text explaining travel plan justification. Paragraph 9.21.8 could be split in two. See suggested wording.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25683	Northern Fringe Protection Group	<p>It remains unclear how 'severe' and 'significant' adverse impacts are defined. These need to be clearly defined in the CS. In the case of air quality, there are maximum legal limits for particulates and nitrous oxides, and it would be appropriate for 'significant' to be defined as the legal limit.</p>
26113	Suffolk Constabulary	<p>The word permeability should be removed from `d' in order to promote security and the following addition made; d. promote pedestrian and cycle accessibility to and within the site, ensuring that any new routes are coherent, clearly segregated for pedestrians and cyclists, overlooked and in accordance with the design principles of policy DM12.</p>

The following made no comments in response to this issue.

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy has been amended to reflect more closely the wording of the NPPF in relation to transport impacts (paragraph 109) and, in discussion with Suffolk County Council, to ensure that sustainable travel modes are maximised through new developments. Thresholds for triggering transport assessments have been amended and a new requirement for transport statements introduced. The thresholds proposed would capture the majority of new dwellings to be provided through allocated sites. The policy has also been changed to reflect the need to consider access for disabled people and people with reduced mobility and to acknowledge the climate change emergency and air quality issues by raising the requirement for electric vehicle charging facilities.

The policy has been amended to reflect more closely the wording of the NPPF in relation to transport impacts (paragraph 109). The NPPF does not provide a definition of 'severe' or 'unacceptable' and therefore it is not considered appropriate to do so through the Local Plan. The Highway Authority has advised that impacts can only be assessed on a case by case basis as they will depend on the local circumstances and the nature of the proposed development.

The policy has been amended to remove reference to permeability and refer instead to routes being coherent and designed in accordance with policy DM12. A reference to safe routes has also been added to the supporting text, as it is recognised that people will be more likely to choose active travel if they feel safe.

57.DM22 (formerly DM21) – Car and Cycle Parking in New Development

Representations	Comments	Object	Support
5		4	1

Statutory Consultations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26020	Suffolk County Council	Support intent of policy but further discussion required in respect of car parking needs. Assumed that 'operational' parking within the central car parking core doesn't refer to staff car parking - Please clarify. Reference to secure cycle parking is welcomed, but 'security' needs to be defined and explained fully in supplementary guidance (E.g. Suffolk Guidance for Parking, forthcoming countywide design guidance or the IBC SPD). The supporting text could also explain that secure means a lockable facility away from public access, lit, covered and has natural surveillance. In respect of employment,

		cycle parking needs to be suitable for long stays.
25956	Environment Agency	DM21 - Car and Cycle Parking in New Development includes reference to flood risk in paragraph 9.21.6 by stating that this is acceptable in flood risk terms as demonstrated through a Flood Risk Assessment. When considering car parking within flood risk areas, the ability of people to move their cars within the flood warning time should be considered. Long-term and residential car parking is unlikely to be acceptable on areas which regularly flood to a significant depth due to the risk of car owners being away from the area and being unable to move their cars when a flood occurs.
25957	Environment Agency	Policy DM21 - Car and Cycle Parking in New Development - Car parking can be appropriate in areas subject to flooding, provided that flood warnings are available and signs are in place however, ideally car parks should not be subject to flood depth in excess of 300mm since vehicles can be moved by water of this depth. Boundary treatments such as railings should ensure that if vehicles become mobilised during a flood event, they are contained within the confines of the site but still allow the free movement of flood water.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26114	Suffolk Constabulary	The presumption must be in favour of in curtilage parking and non-secure under-croft parking must be avoided. Where communal parking is necessary, rear parking courtyards must be avoided and owners should be able to view their vehicles from active rooms within the building. SBD guidance must be followed when providing underground parking to ensure that it is safe and secure.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25827	Cardinal Lofts (Mill) Ltd	The Company welcomes the recognition (para 9.22.6) that many people still own cars and that adequate levels of residential parking, that uses land efficiently and is well designed, needs to be provided as part of new residential schemes.
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The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The changes proposed by the Environment Agency have been incorporated into the supporting text in order to clarify the acceptability (or not) of car parks within flood zones.

The policy and supporting text already define what is expected of cycle parking and what is meant by operational parking. However, supporting text has been added to refer to natural surveillance of cycle parking.

Reference to secure by design has been added to the supporting text to ensure that car park users feel safe.

58.DM23 (formerly DM22) – The Density of Residential Development

Representations	Comments	Object	Support
2	0	1	1

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25886	Associated British Ports	ABP welcomes IBC's support for high density development in the town centre and Waterfront. ABP also welcomes IBC's qualification that it will not insist on the requirement to meet Nationally Described Space Standards if this is demonstrated to be unviable in specific cases.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25828	Cardinal Lofts (Mill) Ltd	The Company welcomes the support for high densities of residential development in the Portman Quarter and Waterfront areas. The Company does take issue with the assertion (para 9.23.4) that the highest density of residential developments are unlikely to be viable due to a combination of rising build costs and relatively low sale values for flats. This may be the case in respect of two and three bedroom flats, aimed at the mature housing market, but there remains a very high demand for small, one and two bedroom flats, aimed at first time buyers.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Paragraph 9.23.4 has been amended to specify that the low sales values for flats is generally concerning larger two and three-bedroom flats. This is in response to a concern that the original wording of ‘low sales values for flats’ does not take account of the high demand for small, one and two bedroom flats, aimed at first time buyers. The amended wording provides greater clarity as a result.

59.DM24 (formerly DM23) – Protection and Provision of Community Facilities

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25578	Theatres Trust	Supportive of this policy although consider that arts and cultural facilities might be brought into this policy. Welcome that there is additional policy provided regarding public houses which face unique challenges compared to other types of community facilities. As well as providing spaces for community meeting, pubs can provide vital spaces for performance at grass-roots level and enhance access to cultural activity.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25670	NHS Property Services Ltd	DM24 - Protection and Provision of of Community Facilities restricts the loss or change of existing Community Facilities. NHSPS objects as the NHS requires flexibility in its estate to ensure that unneeded or unsuitable sites may be disposed of for their best value. Policies which aim to prevent the loss of or change of use, where healthcare is included are considered overly onerous and inflexible. Other rigorous tests exist overseen by NHS commissioners. An alternative wording is offered that would allow NHS support for the policy.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Council recognise that access to healthcare can prevent ill health and lead to better management of long-term conditions. Ipswich has a wide range of health facilities, however as the population grows and ages there will be a requirement for different models of health and social care provision. Policy DM24 seeks to retain existing community facilities (healthcare facilities are included within this definition), unless one or other of the following tests can be met. Either the applicant must demonstrate to the Council's satisfaction that the facility is genuinely redundant, adequately marketed and surplus to current and future requirements; or alternative provision of an equivalent or better facility is proposed or available within a reasonable distance to serve its existing users. The NHS have indicated that policies aimed at preventing the loss or change of use of community facilities and assets (where healthcare is included within this definition), can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. The Council consider that the either or test in DM24 provides sufficient flexibility, however it is happy to provide additional comfort to NHS through the inclusion of the proposed new wording. The new wording will also offer the Council the added assurance that adequate health facilities are or will be made available to meet the ongoing needs of the Borough's population.

The Council do not intend to bring arts and cultural facilities into Policy DM24 as suggested by Theatres Trust. Whilst accepting arts, culture and tourism has community role they also have an economic function which the Council would like to ensure remains part of the tourism offer. The Council already has a separate policy that supports the retention and enhancement of arts and cultural facilities in the Borough, Policy DM28 (Arts, Culture and Tourism). The Council will however amend the accompanying text to policy DM24 to highlight this.

Paragraph 9.24.2 of DM24 sets out what the Council include within its definition of community facilities. It is proposed to combine ‘doctors and dentist surgeries, health centre and chemists’ into a single bullet point ‘health facilities’. This simplifies the policy text and avoids duplication.

The Council must be clear on what information is required to accompany a planning application for the loss or reduction of pub facilities. The Council will insert additional text at the end of paragraphs 9.24.6, to clarify that marketing requirements are set out in appendix 7. The Council will also insert additional text at the end of paragraph 9.24.12 confirming that a viability report must accompany an application to reduce a public houses floorspace or outdoor space. Including this additional detail within the accompanying policy text will help to avoid delays associated with processing applications.

60. DM25 (formerly DM24) – Shopfront Design

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No change recommended

61. DM26 (formerly DM25) – Advertisement

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No change recommended

62. DM27 (formerly DM26) – The Central Shopping Area

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Although no external comments were made, the Council has elected to further amend this policy. This is because, upon reflection, the revised wording (as originally drafted) was too complex and required a simpler and more flexible solution to changes of use in the Central Shopping Area. The policy has therefore since been amended to help achieve this.

63. DM28 (formerly DM27) – Arts, Culture and Tourism

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25577	Theatres Trust	Welcome the support for arts and cultural facilities but there are concerns that policy DM28 does not provide sufficient strength in terms of loss of facilities. This is because 'unviable' is subjective and can be manipulated. For example, a facility with little commercial financial return could be successfully retained if operated under an alternative model. It requires demonstration that facilities are no longer required by the community and that efforts to market have been unsuccessful. Facilities could be under DM24 instead. There are also other performance facilities that

		should be referenced. Temporary and pop-up events are supported.
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The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Council must be clear on what information is required to accompany a planning application for the loss of an arts, cultural or tourist facility. Therefore, reference to the marketing strategy in appendix 7 has been made.

Development management (DM) policies DM31 and DM30 were inaccurately referenced, the Council will update the policy text to ensure users of the plan are being directed to the correct inter-related DM policies.

64.DM29 (formerly DM28) – The Evening and Night-time Economy

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26021	Suffolk County Council	This policy includes a reference to traffic generation, with the implication being that the proposals would be refused if there is a 'significant individual or cumulative effect on traffic generation'. National policy states that proposals should only be refused on highway grounds if there is a severe impact. This policy should be redrafted to ensure consistency with the NPPF in respect of highway impacts or, if the intent is to manage the amenity impacts arising from night time vehicular movements, clarify that point.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

National policy states that proposals should only be refused on highway grounds if there is a severe impact. The policy has been redrafted to ensure consistency with the NPPF in respect of highway impacts.

65.DM30 (formerly DM29) – District and Local Centres

Representations	Comments	Object	Support
3		2	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25725	Freeths LLP on behalf of AqiuGen	Recommend that Ravenswood District Centre is extended to include the Site 1 (Ip141a) frontage plot. The rationale includes: - Geographical proximity to existing centre; - Lidl require a new and larger store due to inadequate parking, limited store sales area and no opportunities to extend. The Site 1 plot can accommodate this. - Lidl will seek to ensure the building avoids long term vacancy and is re-occupied as soon as possible. We would welcome discussions with officers if the principle of this extension to the District Centre is acceptable.
25692	Boyer on behalf of East of England Co-Operative Society	The new District Centre within the plan period at Sproughton Road is supported. The location of the proposed Sproughton Road District Centre has changed from the adopted Local Plan and is now identified as being sited on the Boss Hall Business Park in land within the Society's ownership. The principle of a district centre in this location is supported and A1/ A3 commercial/ retail uses akin to a district centre are proposed through the Society's current planning application, reference 18/00948/OUTFL.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25636	Private individual	With the rise in online shopping and supermarkets focusing on 'local' stores District centres do not have the same importance that they once did. Nacton Road District Centre as identified on the proposal map extends too far, resulting in a scattering of land uses down the street. Size should be retracted to promote empty units within the District Centres.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

How these comments have been taken into account in the Final Draft Local Plan:

The Nacton Road District Centre has not been retracted in size. This District Centre only had 3 of the 40 units recorded as being vacant at the time of the last District and Local Centre Survey (October 2018). The focus on 'local' stores by supermarkets is anticipated to increase demand for smaller units in District and Local Centres. In conclusion, the Nacton Road District Centre is considered to be healthy and functioning well and should not be retracted in size.

The position of the proposed Sproughton Road District Centre has been moved. IP090 has been given consent for a large supermarket use. Subsequently, it was decided to move the location of the proposed district centre to an alternative location. The indicative location has been moved to reflect the recently approved planning permission (18/00948/OUTFL) for commercial and retail uses at the Dairy Crest site on Boss Hall Road.

The Ravenswood District Centre has not been extended to include Site IP141a(1). Site IP141a(1) is allocated for employment use in both the adopted (2017) and emerging Local Plans. Of the 56 employment sites surveyed as part of the Employment Land Supply Assessment (2018), the site scored 23 points out of 30 and the highest scoring site was 25 out of 30 (although this was for leisure-related employment not B-class). It was ranked 1st out of 19 in terms of the allocated/ mixed-use allocated B-class employment sites (i.e. the sites that have not yet been developed) and second in terms of all allocations (including non-b class). The remainder of IP141a(3) has also recently been partially developed for a storage facility and the remainder of the land has an extant planning permission for employment uses which is understood to be implemented in 2020. Furthermore, the Retail and Commercial Leisure Study (2017), did not identify a strong demand for further convenience retail floorspace in the Borough and the future demand would be met by the Ipswich Garden Suburb convenience floorspace provision. Overall, given the high scoring of the employment site and limited demand for convenience retail floorspace, it is not considered appropriate to extend the Ravenswood District Centre to cover this site.

66.DM31 (formerly DM30) – Town Centre Uses Outside the Central Shopping Area

Representations	Comments	Object	Support
1		1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25694	Boyer on behalf of East of England Co-Operative Society	The Society generally supports the approach in Policy DM31 to Town Centre Uses outside the Central Shopping Area. However, Policy DM31 should also acknowledge that district centre locations may also be suitable for non-retail town centre uses (such as leisure) to promote a mix of uses within the district centres.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy has not been amended to acknowledge that district centre locations may also be suitable for non-retail town centre uses. The policy, as worded, is set out to align with Paragraphs 85 and 86 of the National Planning Policy Framework (NPPF) (2019). The NPPF sets a clear expectation that main town centre uses should be located in town centres first. Any proposals for non-retail town centre uses outside the town centre will need to comply with the sequential test of the NPPF Paragraph 86. Consequently, it is not appropriate to include district centre locations as suitable as it would be contrary to the NPPF.

67.DM32 (formerly DM31) – Retail Proposals Outside Defined Centres

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25726	Freeths LLP on behalf of AquiGen	Object to criterion (a) which requires consideration of the appropriateness of scale when assessing out-of-centre retail proposals. The use of 'scale' is no longer recommended by national guidance and is therefore inconsistent with NPPF paragraphs 86 and 89 which only require an applicant to demonstrate compliance with the Sequential Approach and Impact. As identified at paragraph 89 b), scale forms part of the consideration of Impact. There is no requirement to demonstrate appropriateness of scale, separate from impact. A requirement to demonstrate scale has not been identified by the Evidence Base as a retail policy requirement. Remove criterion a.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Criterion A has not been removed from the policy. The revised National Planning Policy Framework (NPPF) (2019) paragraph 89(b) is worded consistently with the previous NPPF (2012) paragraph 24 in terms of applicants and local planning authorities demonstrating flexibility on issues such as format and scale. The wording of 'the appropriate scale of development' was deemed sound in the previous Local Plan examination. Therefore, given the consistency between the revised NPPF and previous NPPF it is not appropriate to amend this.

68.DM33 (formerly DM32) – Protection of Employment Land

Representations	Comments	Object	Support
4		2	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25997	Suffolk County Council	Paragraph 9.32.1 (now 9.33.1), in clarifying that waste uses can come forward on employment allocations when compatible with adjacent uses, is also helpful in respect of relocating the Ipswich Household Waste Recycling Centre. It is also consistent with

		emerging policy WP3 of the SMWLP, which clarifies that land allocated for B2 and B8 uses are appropriate employment allocations, subject to emerging policy GP4 which considers the impacts of proposals on the local environment.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25887	Associated British Ports	ABP supports the safeguarding of the operational areas of the Port through their definition as Employment Areas E9 and E12 on the Policies Map and under Policy DM33. ABP welcomes the recognition at para 9.32.6 (now 9.33.6) of the need for ABP's specific operational requirements and consents and licences for the handling and storage of hazardous substances to be taken into account in any development planned in the vicinity of these areas.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25720	Freeths LLP on behalf of AQuiGen	As NPPF paragraph 120 relates to allocated land and recommends the use of the no reasonable prospect test, to ensure consistency with the NPPF, we recommend Policy DM33 is amended to allow the test to be applied to defined Employment Area land. This will ensure the Plan is consistent with national guidance and adequately flexible to deal with changing market signals and needs. This is particularly important given the surplus allocation position compared with need as identified in our assessment. There is ambiguity regarding paragraphs 9.32.2 (now 9.33.2) and 9.32.4 (now 9.33.4) in relation to the "no reasonable prospect test" and employment area land.
25695	Boyer on behalf of East of England Co-Operative Society	The protection of the Boss Hall Business Park is generally supported. However, the policy is currently considered to be too restrictive. Paragraph 9.32.7 (now 9.33.7) defines

		<p>appropriate employment-generating sui generis uses and excludes any sui-generis use that includes retail and leisure as another other than an ancillary use. Retail and leisure uses are employment generating in themselves and can assist in underpinning the vitality and attractiveness of employment areas, and so the policy is too restrictive. The Site allocations DPD makes reference to a new retail allocation at Boss Hall Business Park. Strict long-term protection for only B-Class uses would be inappropriate.</p>
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The following made no comments in response to this issue.

**Parish and Town Councils
Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

Paragraph 9.33.4 of the reasoned justification has been amended to state that “in accordance with policy” to make clear that the no-reasonable prospect test only applies to land outside defined employment areas. This is because it is not clear that this is the case in the originally drafted wording and needs to align with the provisions of the policy wording.

The policy has not been amended to allow for the no reasonable prospect test to be applied to protected employment land. The preparation of the Preferred Options Local Plan Review has been undertaken in accordance with NPPF Paragraph 120. The Draft Strategic Housing and Employment Land Availability Assessment (2019) considered protected employment land when assessing site deliverability and this was formulated on the evidence obtained in the Employment Land Supply Assessment (ELSA) (2018). The protected employment areas that are included in the Local Plan Review scored highly in the ELSA., The inclusion of these protected employment sites could affect the Council’s ability to achieve its employment objectives and jobs targets.

The definition of appropriate employment-generating sui-generis uses has not been amended to include retail and leisure uses. It would be inappropriate to do this because it would conflict with Preferred Options Policy DM32 regarding out-of-town retail if either of these uses were larger than ancillary uses. The loss of employment land, whether in existing employment use or within a defined Employment Area, could affect the Council's ability to achieve its employment objectives and job targets. Land and buildings in employment use may also come under pressure from other forms of development that tend to have higher values such as retail and leisure. As a general principle therefore employment uses should not include non-ancillary retail and leisure uses.

69. DM34 (formerly DM33) – Delivery and expansion of Digital Communications Networks

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy and supporting text have been amended to future proof the delivery of new technologies that may not be known now but could potentially come forward in future stages of the plan period. The additional wording will ensure that Ipswich is not limited to the delivery of old technologies if new ones are developed.

70. Chapter 10 – Implementation

Representations	Comments	Object	Support
5	0	4	1

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25611	Westerfield Parish Council	<p>Westerfield Parish Council comment on Table 8B:-</p> <p>Re. Fonnereau Way</p> <p>The Parish Council are concerned that Network Rail are seeking to close the at-grade pedestrian rail crossing on Fonereau Way. This is an important footpath and the Parish Council consider the cycle /pedestrian bridge at this location in Table 8B as important both to benefit the Country Park as part of Ipswich Garden Suburb but also to provide access to countryside in Westerfield and beyond.</p> <p>Re. Off-site junction improvements and Traffic Management in Westerfield.</p> <p>The Parish Council support these requirements to reduce the effect of additional traffic in Westerfield.</p>

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25607	Department for Education (DfE)	It would be useful if the Infrastructure Delivery Plan included evidence of how the forecast housing growth at allocated sites has been translated (via an evidence-based pupil yield calculation) over the plan period. This would help to demonstrate more clearly that the approach to the planning and delivery of education infrastructure is justified.
25985	Suffolk County Council	Development proposed in the Plan will generate significant demand for additional early education places. The Plan needs to include a strategy for securing land and appropriate contributions towards build costs. This will need to include allocations in local plan policies and approximate costs within an infrastructure delivery strategy, for the purposes of estimating developer contributions. An indicative approach is included as an appendix to this letter (appendix 2). The County Council would appreciate discussion of the initial/indicative approach and how it will relate to local plan allocations and agreement of delivery mechanisms.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25651	Northern Fringe Protection Group	Transport modelling shows severe capacity issues at many key junctions in and around Ipswich that will result in gridlock but there are no transport infrastructure projects included in the Infrastructure Tables to resolve capacity constraints. This is especially the case in and around the town centre, A14 and A1214. Some form of northern relief road is clearly required and along with improvements to over-capacity junctions such as Henley Road/ Valley Road and needs to be included in the Infrastructure Tables and delivered for full development of the Ipswich Garden Suburb to be allowed.
25659	Northern Fringe Protection Group	There are still no firm proposals for new sewage infrastructure that is required for the

		<p>IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.</p> <p>The effectiveness of the Core Strategy to deliver both employment and homes growth, including the IGS, could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the plan period and plan for its provision.</p> <p>The three Anglian Water improvements need to be added to the Infrastructure Table.</p>
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The following made no comments in response to this issue.

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Chapter 10 has been amended to change the formatting of Table 8A. The new table provides greater detail on the infrastructure requirements. This includes early years and education requirements based on advice from Suffolk County Council, and transport requirements for the strategic and local networks, linking to the Suffolk County Council Transport Mitigation Strategy where appropriate. In relation to sewerage infrastructure at Ipswich Garden Suburb, no change is proposed, because the responsibility for its provision lies with Anglian Water and they are looking at what work will need to be carried out to accommodate the IGS development. General information about water supply and foul sewerage has been added to Table 8A to reflect input from Anglian Water.

Supporting text has been added to section 10.5 of Chapter 10 to explain the strategic context for infrastructure provision at the LEP and County level, for example, and refer to the Recreational disturbance Avoidance and Mitigation Strategy and its relationship to this section of the Plan.

A change to Table 8B aligns it with the wording of policy CS10 in relation to healthcare provision, on the advice of the Clinical Commissioning Group.

71. Chapter 11 – Key targets associated with Part B

Representations	Comments	Object	Support
6	0	6	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25959	Environment Agency	The key targets of the plan are outlined on pages 155 to 159. We welcome the inclusion of objective 1 which aims for high standards of design in new development and ensures that development is sustainable, environmentally friendly and resilient to the effects of climate change. The objective could be further enhanced by referencing property level protection to this objective.
25960	Environment Agency	Objective 1 We support the use of SuDS in this objective however it is important to be clear that SuDS, if soaking into the ground, may not be suitable at some sites. Non-infiltration SuDS should be used where contamination is present, or groundwater levels are too high.
25961	Environment Agency	We are pleased to see reference to the Ipswich tidal barrier in objective 7. The objective states that the implementation of the barrier is due by the end of 2019. We are pleased to say that construction is now complete, and the barrier is operational. Therefore, this objective should be updated accordingly.
25962	Environment Agency	Objective 8 states that there is no net loss of natural capital by 2036. This should be more ambitious to reflect net gain principles in accordance with paragraph 170 of the NPPF. Any impact on biodiversity from human activities and development need to be balanced by at least equivalent gains for biodiversity.
25963	Environment Agency	The current objectives do not count for all of the environmental impacts of development in the borough. EA suggests the following: 1 Ensure the protection and enhancement of the environment by endeavouring to meet the objectives of key environmental legislation. This should include the promotion of measures supporting climate change adaptation, delivery of air quality targets, delivery of WFD objectives and flood risk management, including SuDS and water quality. 2 To allow sustainable growth, ensure adequate utilities infrastructure is provided in a timely and efficient manner, ahead of the occupation of developments in order to safeguard the local water environment.
25964	Environment Agency	In addition, EA would also welcome the addition of wording stating that areas of

		brownfield land be brought back to beneficial use in accordance with NPPF paragraph 118 section c.
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The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Key targets have been amended to reflect those set out in the objectives chapter. The objectives have been rationalised under subject headings, which better relate to the key issues across Ipswich and Suffolk. The indicators have been updated to ensure the data is obtainable and targets have been rationalised to ensure they are outcome focussed and reflect the highest priorities in the plan.

Objective 3, indicator 4 (proportion of new dwellings on previously developed land) has been amended to make clear that the Council actively supports the development of brownfield sites.

The Council supports efforts to improve flood protection through the installation of individual property level flood protection measures. However, many permanent flood protection structures are classed as permitted development, not requiring planning permission. As such, the Council has no reliable mechanism for monitoring the number of properties incorporating property level flood protection.

The Council acknowledge that some previously used sites will have contaminated soils. SuDS can still be incorporated, although infiltration SuDS may not be suitable as concentrated ground flow could lead to water-borne contaminants being transferred to deeper soils or sensitive aquifers. Accordingly, SuDS on contaminated land should be lined and designed to attenuate water on or near the surface. The Council intend to amend objective 4, indicator 3, to make clear that infiltration SuDS may not be suitable on some sites. The Council will also consider amending Policy DM4 Development and Flood Risk.

Objective 4 has been amended to reflect the fact that the barrier is now complete and operational. Going forward the Council will monitor the flood and coastal erosion risk management.

The principle of biodiversity net gain is promoted in the Government’s 25 Year environmental plan and is strongly referenced in terms of planning policy and decision taking in the NPPF 2019. It is proposed to update objective 9, target 4, reflect the hierarchy of environmental protection now set out in the NPPF. This change also takes account of actions and recommendations in the HRA.

72. Chapter 12 – Monitoring and Review

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No representations received. No significant changes.

73. Part E – Appendices

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26012	Suffolk County Council	SuDS Definition (page 178): It would be helpful to extend this definition of SuDS to state that SuDS are used to attenuate and treat runoff.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The glossary has been updated for numerous changes, including the definition of SuDS.

74. Appendix 1 – A List of Policies Included in this Document

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Updated to reflect change in policy numbers.

75. Appendix 2 – Saved Policies that are superseded by the Core Strategy and Policies Development Plan Document

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No changes.

76. Appendix 3 – Community Facilities in District and Local Centres

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No changes.

77. Appendix 4 – Activities or services relevant to each planning standard charge heading

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25802	East Suffolk and North Essex NHS Foundation Trust (ESNEFT)	Under 'Health and Emergency Services' add, including acute and general healthcare requirements to 'Health Facilities'.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Health and emergency services definition updated.

Water utility clarified to include “potable and wastewater supply” following comments from Anglian Water on other policies.

University Campus Suffolk changed to “The University of Suffolk”.

78. Appendix 5 – Ipswich Standards for the provision of open space, sports and recreation facilities

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25573	Ipswich Canoe Club	This part of the Plan is focused on land-based recreational/ sports facilities (nothing water/ river based). Recommended to include more statement of vision based around ongoing engagement with relevant local people and groups to achieve better recreational, leisure and economic use of the Rivers. River portages, facilities and parking could be better to encourage more use. Better flow of the river Gipping would reduce weed on the river, requiring co-ordination with Environment Agency. Better access between the Orwell and

		Gipping. Support local community projects. Vision could be more imaginative (e.g. Norwich, Cambridge or Upper Thames?).
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Reference to water-based activities added.

Table number changed from 10 to 9.

79. Appendix 6 – Glossary

Representations	Comments	Object	Support
1		0	0

No comments were made on this.

How these comments have been taken into account in the Final Draft Local Plan:

Although not in response to any comments, some changes to the glossary have been undertaken.

A definition for Biodiversity Net Gain has been included to respond to updates to national Planning Practice Guidance.

A definition for Blue Corridors has been added in light of additional emphasis on blue corridors in policy DM10. Similarly, a definition for Green Corridors has been included as well.

The definition of Gypsies and Travellers has been amended to provide further clarification. In addition, a term and definition for Travelling Showpeople has been inserted as well.

A term and definition for “Landmark Building” has been added to the glossary. This is to assist with the interpretation of the site sheets which have been updated to include urban design terms such as this.

The definitions and terms for the retail zones (primary, secondary and specialist) have been amended to reflect the changes to policy DM27.

A term and definition for SANGs has been added in light of the specific reference to SANGs that has been inserted into Policy ISPA4 and the site sheet for ISPA4.1.

The definition for SuDS has been amended to explain that typically this includes the treatment of run-off from development sites.

80. Appendix 7 – Marketing requirements

Representations	Comments	Object	Support
1		1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25723	Freeths LLP on behalf of AquiGen	<p>Welcome the introduction of marketing requirements generally but suggest amendments:</p> <ul style="list-style-type: none"> - Paragraph 2.1; agreement with the Council before marketing is carried out is unnecessary. - Paragraph 2.5; providing names and contact details raises potential confidentiality issues. A simple schedule noting the origin of an enquiry and reason is sufficient. - Paragraph 2.6; A commercial site is not generally marketed at a set value and to agree this with the Council is unprecedented and unreasonable.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Marketing Strategy amended to reflect comments.

Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review

Representations (Overall)	Comments	Object	Support
160	46	87	27

1. Foreword

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No significant changes. No comments received.

2. Chapter 1 – Introduction

Representations	Comments	Object	Support
2	0	2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25860	Save our Country Spaces	SOCS suggest the Final Draft Local Plan fails the tests of soundness as it is not positively prepared, not justified, not effective and not consistent with national policy. The Climate Change agenda (NPPF10) is insufficiently addressed and proposals are contrary to this. The HRA and SA have inadequately and inaccurately assessed the effects of the plan. Serious adverse effects, as required under NPPF 6 - 17, have not been properly identified. NPPF-11 has not been adequately taken into account.
25869	Save our Country Spaces	Suggest the Final Draft Local Plan fails the tests of soundness as it is not positively prepared, not justified, not effective and not consistent with national policy.

		<p>The Climate Change agenda (NPPF10) is insufficiently addressed and proposals are contrary to this.</p> <p>The HRA and SA have inadequately and inaccurately assessed the effects of the plan. Serious adverse effects, as required under NPPF 6 - 17, have not been properly identified.</p> <p>NPPF-11 has not been adequately taken into account.</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Local Plan as a whole is considered to meet the tests of soundness. It is consistent with national policy, positively prepared, justified and effective.

The climate change agenda is sufficiently addressed as the Council have planned positively in terms of biodiversity net gain and retained policy mechanisms such as DM1 (Sustainable Construction) and DM2 (Decentralised Renewable or Low Carbon Energy) to support this.

The NPPF does not require Local Plans to define ‘serious adverse effects’. Paragraph 32 of the NPPF refers to ‘significant adverse impacts’ but only in the context of the sustainability appraisal and the need to avoid impacting on the economic, social and environmental objectives. The Sustainability Appraisal has assessed the Local Plan against these objectives in accordance with the NPPF.

The Habitat Regulations Assessment (HRA) and the Sustainability Appraisal (SA) are accurate and robust in terms of their assessments of the Local Plan.

The Council believes the Local Plan to be in accordance with paragraph 11 of the NPPF in relation to the presumption in favour of sustainable development.

The plan needs to be viewed in the round. This document objection is only one element of the plan. The Vision and Objectives set out in the Core Strategy of the Plan set out the strong commitment of the Council in relation to climate change.

Paragraph 1.10 has been amended to confirm that the revised Local Development Scheme was adopted in February 2019.

3. Chapter 2 – The Ipswich Local Plan

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No changes arising from comments as no comments made.

Paragraph 2.8 lists the key elements of the local evidence base. However, some of the documents that it references have been updated and therefore minor amendments to this have been made.

4. Chapter 3 – Vision and Objectives

Representations	Comments	Object	Support
5	0	0	5

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25804	AONB	The AONB team welcome the inclusion of the following objectives in the emerging Core Strategy & Site Allocations Review DPDS: Objective 5 Opportunities shall be provided to improve strategic facilities in Ipswich by: - Extending the strategic greenspace, ecological network and canopy cover
25805	AONB	Objective 6 To improve accessibility to and the convenience of all forms of transport and achieve significant modal shift from the car to more sustainable modes. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative 'green' non-vehicular access around the town and urban greening of existing routes. Specifically: - Comprehensive, integrated cycle routes should be provided; and

		- Ipswich Borough Council aspires to an enhanced public transport system.
25806	AONB	Objective 7 - Enhanced flood protection including a tidal surge barrier to be in place to protect the town's existing and expanding communities from the threat of tidal flooding.
25807	AONB	Objective 8 -To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and conserve and enhance the historic environment and landscape character of Ipswich, including historic buildings, archaeology and townscape.
25808	AONB	Objective 11 -To improve air quality and create a safer, greener, more cohesive town.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

For information, the vision and objectives have been amended to align with the changes made to the Core Strategy DPD vision and objectives. Please see the assessment of the Core Strategy section for a list of the changes.

5. Chapter 4 – Site Allocations

Representations	Comments	Object	Support
13		12	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25602	Department for Education (DfE)	The DfE requests that a site is also allocated for Central Ipswich Free School which is planned to open on the Former Co-Op Department Store site on Carr Street (IP4 1HB). This primary school will have two forms of entry providing education for 3 -11 year olds. We are happy to provide further information to help add detail to this site allocation in the next iteration of the local plan.

25604	Department for Education (DfE)	Table 8B (chapter 10) of the Core Strategy provides further details of the schools required in Ipswich Garden Suburb. The next version of the Local Plan should include similar details for all schools within the site specific policies so that all stakeholders are clear about the site requirements. Where possible the next version of the plan should also seek to clarify requirements for the delivery of new schools, including delivery time to support housing growth, the minimum site area, any preferred site characteristics and any requirements for additional land safeguarding. The Milton Keynes draft policy CC7 is a good example.
25605	Department for Education (DfE)	The site specific policy requirements need to be set out clearly, informed by robust evidence of infrastructure need, so that they can be accurately accounted for in the viability assessment of the local plan (to ensure that the total cumulative cost of all relevant policies will not undermine deliverability of the plan), and in the price paid for land by developers and other parties.
25606	Department for Education (DfE)	While it is important to provide certainty to developers, retaining flexibility is also necessary given that the need for school places can vary over time. The DfE therefore recommends considering the following in the next version of the Plan: Site specific requirements for developer contributions to enlargements of existing and new schools at application stage. Requirements to deliver schools on some sites could change in the future if it were demonstrated and agreed that the site had become surplus to requirements. Further details regarding establishing new schools is provided in the full text.
25981	Suffolk County Council	Detailed comments on archaeological constraints have, in the past, been included on the site sheets. The County Council would appreciate a discussion about reflecting detailed archaeological requirements as site-specific policy, as has become standard practice in other parts of the county. See Appendix 4 for site-specific comments in respect of public rights of way.
25996	Suffolk County Council	The Waste Core Strategy and SMWLP protect permitted and proposed waste facilities from

		<p>being prejudiced by development within their proximity. This is defined as 250m from the boundary of the waste site. Table 1 (Appendix 3) shows the proposed Ipswich allocations that fall within this. At planning application stage the developer of these sites should demonstrate that development does not prevent the facility from operating, and that the users of the development are protected. It is recommended that this requirement is included in the text for these sites. This also applies to minerals facilities.</p>
25999	Suffolk County Council	<p>The majority of the allocations in Ipswich are within the Minerals Consultation Area (MCA), meaning that the County Council would normally seek to protect the resources on these sites. However, most of these are too small to trigger policy MP10 in the SMWLP. Sites larger than five hectares within the MCA are shown in table 3 (Appendix 3). The table also identifies the predicted area of actual mineral in the site.</p> <p>It is recommended that text is added to the plan explaining that use of minerals on site may be required by the County Council, as stated in the SMWLP.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25813	AONB	<p>The relevant sections in the Site Allocations and Policies Review document (IP150b- SP7, IP150c - SP5, IP150d- SP2, & IP150e- SP2) and Policies</p> <p>Review document should be amended to identify the need for a full assessment of impacts of the proposed development on the Natural Beauty and Special Qualities of the AONB. This is necessary to help inform mitigation needed to offset the worst impacts. The AONB team would be happy to discuss the scope of an AONB impact assessment at the appropriate stage of the planning process.</p>
25814	AONB	<p>We note that a masterplan is to be prepared for these sites (IP150b- SP7, IP150c - SP5, IP150d- SP2, & IP150e- SP2) along land at Airport Farms Kennels site which is welcomed.</p>

		The AONB team would like to be involved in any masterplan meeting or workshops and consulted on future iterations of the masterplan as it evolves.
25842	Ravenswood Environmental Group	No credible consideration of the cumulative impacts of development at the six sites at Ravenswood on; traffic, residential amenity, various protected sites (including Nature Reserves and an SPA), air quality, noise and the environment. Such a large centre of development needs a clear policy environment relating to access. The plan fails to satisfy the requirements of paragraph 16d of the NPPF. The plan is not justified or positively prepared. It is not effective as there is no clarity as to what is expected of proposals. The plan is trying to allocate a large site via "stealth", without appropriate assessment.
26115	Suffolk Constabulary	In response to your request for feedback on 'Site Allocations and Policy (incorporating IP-One Area Action Plan) Development Plan Document Review Preferred Options', it is requested that you include a requirement that all new and refurbished building proposals are required to be carried out in accordance with Secured By Design (SBD) standards following consultation with the local Design Out Crime Officer (DOCOC). This will ensure that every opportunity to design out crime has been taken at the earliest opportunity in the planning process and improve the quality of the built environment for those who live, work, study-in and visit Ipswich.
25633	Suffolk Wildlife Trust	We recommend that any sites of significant wildlife value are not allocated for development and that where sites are allocated adequate mitigation measures are secured as part of the allocation policy.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25968	Boyer on behalf of Austin Street Projects Ltd	The land at 68a Austin Street is vacant and secure. There is an intention to redevelop the site to deliver a high-quality residential development, comprising predominantly of

		<p>affordable housing.</p> <p>The site was submitted to the 2017 'Call for Sites' and it has been assessed within the draft SHELAA as being suitable, available (immediately) and achievable (within 5 years) for residential development (SHELAA Ref. IP309).</p> <p>Given the positive assessment through pre-application discussions, as well as through the draft SHELAA, the land at 68a Austin Street should be included as an allocation for residential development within the emerging Local Plan.</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The primary school allocation at Carr Street has been specifically listed in Table 5 of Policy SP7 under site IP048a. Table 8A of the Core Strategy Final Draft sets out the infrastructure requirements that are likely to be needed over the plan-period.

The Ipswich Local Plan Review has been subject to a Habitats Regulation Assessment (HRA) and the site sheets have been updated to take account of the actions and recommendations of the HRA.

The Council has commissioned a Wildlife Audit Update. The results of this have been fed into the site selection and site sheets.

The archaeological comments on individual sites have been incorporated into the site sheets where appropriate.

The IP150 sites have considered the impact on the nearby AONB and this is highlighted in the site sheets. In addition, the Council will seek to involve the AONB Unit in any future master planning work.

The air quality and transport modelling work which is ongoing has considered the cumulative impacts of development on the surroundings, which includes the allocations at Ravenswood. This also considers the cumulative impact of likely development in the neighbouring authorities.

68A Austin Street (IP309) has been included as an allocation.

A new site has been identified at the corner of Hawkes Road and Holbrook Road (IP125) and this has been added to Policy SP1.

The BT Depot site (IP129) has been removed from SP1 and transferred to SP7 as it is now allocated for a Special Educational Needs and Disability (SEND) school.

Sites IP028b, IP045, IP052 and IP226 have been transferred to new Policy SP4 (Opportunity Sites).

The Suffolk Retail Park site (IP346) has been deleted as it has recently been redeveloped and occupied as a retail use and it is therefore considered unlikely that it will be deliverable for residential development over the plan period.

Internal comments from the Urban Design and Conservation Team have been considered and have influenced the site sheets where appropriate.

6. Policy SP1 – The Protection of Allocated Sites

Representations	Comments	Object	Support
2	0	1	1

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25888	Associated British Ports	Support the safeguarding of sites, subject to the recognition that where sites (such as the Island Site) are in existing use and are allocated for alternative use(s), redevelopment will be dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for redevelopment, such sites should reasonably be able to continue in their existing use. In the case of the Island Site, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26061	Barton Willmore on behalf of Telereal Trillium	Telereal is supportive of this policy as IBC has allocated the entire Bibb Way site for residential uses after the prior approval was granted in 2018. The Bibb Way Site is vacant and ideally situated for residential uses, given its proximity to a number a services and

		facilities in and around Ipswich town centre. It is also in keeping with the surrounding area, which is mainly residential and comprises a mixture of houses and flats.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The wording of SP1 has not been amended to state that redevelopment will be dependent on commercial viability. This is because it is not deemed necessary to explicitly state this as it is reflected in the likely delivery timescale aspect of the tables in the Site Allocations DPD and the Strategic Housing and Economic Land Availability Assessment (SHELAA). For example, the Island Site (IP037) has been included as a 'long' timescale allocation to reflect the master planning and infrastructure delivery for this which will then inform the viability. Allocations will be revisited under future Local Plan reviews which will need to be informed by the latest SHELAA and take into account commercial viability.

7. Policy SP2 – Land Allocated for Housing

Representations	Comments	Object	Support
4	0	4	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25965	Environment Agency	Paragraph 4.12 on page 25 outlines the requirement for the sequential approach to sites in line with paragraph 158 of the NPPF. The paragraph suggests that development has been sequentially sited and the exception test has been applied as well. It is however not clear how this has been achieved. We are currently reviewing the Sequential and Exception Test statement and will advise of any further work required.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25812	AONB	Sites IP150b - IP150e are being proposed for mixed use residential, leisure and employment developments. These sites sit wholly within the Suffolk Coast & Heaths AONB. The site sheets make no reference to this in the constraints section. They should be modified to reflect this.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25925	Turley on behalf of Pigeon Investment Management Ltd	Pigeon consider that the majority of the sites that the Council has proposed for residential allocation are subject to significant constraints that could delay, or indeed, ultimately prevent their delivery. Pigeon do not consider the approach of relocation of existing uses, where there is no reassurance that these can be successfully located elsewhere, as an appropriate strategy for delivering housing in Ipswich. Pigeon therefore strongly object to this approach and suggest that the Council follow their Duty to Co-operate, of working with neighbouring authorities to deliver a proportion of their housing requirements.
26097	Salter and Skinner Partnership	Development (113 dwellings) at Bourne End Nursery is appropriate on brownfield site. Supports the government objective to boost housing on previously developed sites. Council does not have 5-year housing land supply. Sites in flood zone 2 can be developed for housing if there are no sequentially preferable sites, subject to exception test being met. There aren't other suitable sites to ensure the Borough has a suitable range of sites. The development can be made safe for its lifetime. Only minor shortcoming is partial-flooding of road but not dangerous enough for refusal. Allocate site for housing. (see appendix accompanying reports)

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The plan strategy and many of the development allocations remain the same as the adopted Local Plan. Since its adoption, the tidal barrier has been installed to protect central Ipswich from tidal flooding. An update of the Council’s Strategic Flood Risk Assessment is currently underway and will result in updated sequential and exception test statements being published alongside the regulation 19 version of the plan.

The AONB Unit have since confirmed that the IP150b – IP150e sites are not within the AONB.

The Council is focusing more resources onto site delivery, as evidenced through the draft Housing Delivery Action Plan published on 16th August 2019. The Council has also re-reviewed the proposed site allocations since the preferred options draft plan to update site constraints information and reflect feedback received, where appropriate. As a result of the additional site reviews, a new category of ‘opportunity sites’ is proposed. These are sites which the Council wishes to see regenerated for residential-led development, but where both significant further work is needed in relation to existing uses, and the sites are not in the Council’s control as landowner.

The Bourne End Nursery site is being assessed through a wider Strategic Flood Risk Assessment and this will inform whether or not the site is considered to be safe in terms of flood risk. Until such a time as this work deems the site to be safe, the site will not be included.

Reference to the site sheets has been made in the policy wording to given them greater emphasis and ensuring that developers are aware both of constraints and Council vision for site development.

A new concept called “opportunity sites” has been introduced. This change was made to encourage the regeneration of important, central, brownfield and in some cases long-allocated sites, whilst reflecting the constraints relating to site ownership (private) and current occupation (in use). The constraints mean that the sites may not come forward over the plan period. If this is the case, this approach to allocation will ensure that they do not artificially inflate the housing land supply.

8. IP003 – Waste tip and employment area north of Sir Alf Ramsey Way

Representations	Comments	Object	Support
2		2	

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25967	Environment Agency	IP003 - HWRC and employment area north of Sir Alf Ramsey Way. The site currently holds an environmental permit which will need to be surrendered should the area be redeveloped. If controlled waste is to be removed, the operator must ensure a registered carrier is used to convey the waste to a suitably permitted facility. All documentation to be kept in accordance with regulations. Excavated materiel arising from remediation or re-development works can sometimes be classified as waste. Further guidance on how waste is classified, best practice for handling, transport and disposal can be found on our waste pages.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25553	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping River, please consider provision of 'portage' easy river access and facilities including possible canoe/ kayak/ boat storage facilities within IP003 Land for Residential Use. However, noting that this end-section of the River Gipping, bordering IP003, just before the weir has fairly static and relatively unclean water, it will be necessary to have improved schemes to clean up this river section and minimise refuse and food waste being deposited here, in order to make this section more amenable to recreational and leisure use.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site sheet has been amended to reflect the proposed changes from the EA. This site is not considered suitable for water recreation because of the proximity of the local nature reserve and county wildlife site. Other changes include reference to a 10m River Corridor Buffer where no development should take place; the recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development;

design and conservation advice has also been included, in reference to the Valley Ipswich Urban Characterisation Study SPD and the need for master planning. The site may also need to include early years provision subject to flood risk considerations.

9. IP004 – Bus Depot, Sir Alf Ramsey Way

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site is allocated for mixed residential & B1 office use; historic depot to be retained and converted as part of B1. The site sheet has been updated to better reflect regulations about the removal of controlled waste when the site is redeveloped. It also now contains more information regarding potential archaeology to reflect the adopted Archaeology SPD and the 10m Blue Corridor required by Natural England. There is in addition more on design requirements to reflect the location and context of the site and river walk requirements.

10. IP009 – Victoria Nurseries, Westerfield Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No changes made as no representations received. However, additional design advice added to reflect the two active frontages of the site.

11. IP010a – Co-Op Depot, Felixstowe Road

Representations	Comments	Object	Support
7		6	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25600	Department for Education (DfE)	The DfE strongly supports the allocation of site IP010a which includes 25% of the site to be safeguarded for an extension to Rosehill School (also referenced in Policy SP7).
26149	Suffolk County Council	Desk-based assessment has been undertaken for this site.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25677	Boyer on behalf of East of England Co-Operative Society	Supports allocation for residential development, but objects to the detail of the allocation – the proposed density of a future scheme is considered very low for a sustainable location and the abnormal costs associated with remediating the site. A mixed-use scheme, comprising residential development with additional community uses, such as a doctor's surgery is suggested. This should be reflected in the Council's Site Allocations Document.
25678	Boyer on behalf of East of England Co-Operative Society	The Society do not object to disposal of part of the site to the school to the north, however, such a sale needs to reflect the abnormal costs associated with the site, including the presence of contamination, and in turn to acknowledge the impacts on viability of proposals for development of the site as a whole as referred to in submission reference 25677.
25679	Boyer on behalf of East of England Co-Operative Society	The Society objects to the following wording in this policy's supporting text "cycle and pedestrian bridge to link the District Centre with the housing to the north of the railway". The provision of land and the cost associated with such infrastructure is not considered viable when acknowledging the abnormal costs associated with the site, including the presence of contamination. As currently worded, it is considered that this aspect of the policy is not justified as it fails to properly consider viability and therefore fails to

		meet the tests of soundness, as required by paragraph 35 of the NPPF (2019).
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25727	Private individual	It should include a pedestrian route from Hines Road to Derby Road near Rose Hill School. Many children and their parents walk along Derby Road to the school. The road is often busy and the pavement is narrow. The provision of the new pedestrian route would make it a pleasanter journey and there would be less chance of an accident. It would also reduce exposure to traffic pollution. Recommend a pedestrian route from Felixstowe Road near King Edwards Road to close to the school. An additional benefit is that it would be pleasanter for people walking to Derby Road Station.
25716	Private individual	When this area is redeveloped I would consider it prudent to include a footpath from Hines Road to connect to Derby Road at/near Rose Hill School for the obvious benefits to the safety of parents and children. I would consider an access road to the redevelopment adjacent to the school to be an error, due to safety reasons and congestion (Any Road link by-passing the Felixstowe Road/ Derby Road junction would become a rat-run.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

How these comments have been taken into account in the Final Draft Local Plan:

The requirement in the policy is not to actually provide the cycle and pedestrian bridge to the housing north of the railway rather to reserve the land which is far less onerous and should not adversely affect viability.

The density of 45dph is considered to be appropriate due to the unique site constraints (noise from railway, the need to avoid over-looking of school etc).

The details of the sale of land for the expansion of Rosehill School is a matter of negotiation between Suffolk County Council and the East of England Co-Op Society over which the Borough has no influence.

The comments relating to Archaeology in the site sheet have been updated to reflect comments from the Archaeology Service Unit.

This is a key pedestrian and cycle desire line, and the alternative routes are not attractive or convenient. The land is required to allow for a bridge to come forward in the future.

In addition, there is additional design advice provided in the site sheet and reference to the Wildlife Audit 2019.

12. IP010b – Felixstowe Road

Representations	Comments	Object	Support
1		1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25718	Private individual	I would suggest that the footpath requested for IP010a (see separate representation) be extended to also exit on Felixstowe Road opposite King Edward Road. If possible, I consider it better that any servicing road system to the redevelopment(s) loop in from this point to join Hines Road.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

The site sheet does explain that land should be reserved for either IP010a or IP010b to facilitate development of a cycle and pedestrian bridge. Ultimately, the precise positioning of any footpaths or rights of way will be subject to future master planning and the purpose of this allocation is to safeguard the land in question and to ensure it takes account of its provision.

In addition, there is additional design advice provided in the site sheet and reference to the Wildlife Audit 2019.

13.IP011a – Lower Orwell Street Former Gym & Trim (formerly Smart Street/ Foundation Street)

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26150	Suffolk County Council	Add from this from the SPD: "Design questions would relate to the surviving defences and structures in particular, which were largely left in situ in earlier excavations". Please also note that archaeology could be a major consideration rather than would be?

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site capacity has been increased from 14 (90dph) to 18 (110dph). This increase was determined as part of a density review of the sites taking into account the sustainable location of the site and its surroundings. The site sheet has been amended to reflect comments from the Archaeology Unit.

In addition, there is additional design advice provided in the site sheet and reference to the Wildlife Audit 2019.

14.IP011b – Smart Street/ Foundation Street (south)

Representations	Comments	Object	Support
1	0	0	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25558	Plansurv Ltd on behalf of Ortona Properties Ltd	The landowner supports the existing allocation for the primary residential use and secondary employment use of the site. the current use of the site remains as a bus depot under a lease agreement but could come forward for development between the middle to end of the plan period. The site provides important linkage for the redevelopment of Merchants Quarter and would provide improved frontage along Star Lane, which in turn would provide visual enhancement to the Central and Wet Dock Conservation Areas.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Reference to the linkage that the site provides added. Site capacity increased from 44 to 56 to reflect the findings in the density review.

The secondary use of employment (B1) has been deleted. This is because of the surplus of employment land in the Borough and the fact that this site in particular lends itself more favourably to a higher level of residential dwellings than other parcels of land allocated for employment development in the Borough.

Development principles and reference to the findings of the 2019 Wildlife Audit have also been included in the site sheet.

15.IP011c – Smart Street/ Foundation Street (North)

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26151	Suffolk County Council	This was formerly part of 11b, but the requirements are different as most of the area of 11c has been excavated in the past.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Comments from the Archaeology Unit integrated into the site sheet. In addition, design principles have also been included referencing the sensitive location of the site.

16.IP012 – Peter’s Ice Cream, Grimwade Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No representations made but changed the capacity to 35 (110dph) from 20 (90dph) in the preferred options version of the draft plan. This is to reflect the findings of the density review.

In addition, comments from the Archaeology Unit have been integrated into the site sheet. Design principles have also been included referencing the sensitive location of the site.

17.IP014 – Hope Church

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The planning permission at the former Odeon site (18/00316/FUL) has been listed in the current use section of the site sheet for clarity.

18.IP015 – West End Road Surface Car Park

Representations	Comments	Object	Support
1	0	1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25537	Private individual	I reject any suggestion or plans to development this site and change of use. The land I would only agree to improve parking by the means of a multi-storey carpark. This must remain a commuter's car park in the first instance.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

No comments were made in response to this issue.

How these comments have been taken into account in the Final Draft Local Plan:

This site has become an important site in terms of the Council's Parking Strategy which is looking to review car parks in the town so that the needs of residents of Ipswich and the commuting wider public are met. As such this car park is allocated in part for a multi-storey car park which is designed for long-term parking to meet the needs of commuters.

The site is also a long-term housing site which is a sustainable use of land, given the proximity of the site to the railway station, sources of employment in the immediate environs and within walking distance of the town centre. Hence it remains also important for the remaining part of the site to be allocated for housing.

Residential density has increased to 100 dwellings per hectare (dph) from 90(dph) which increases housing numbers on the site from 43 in the Preferred Options to 67 in the Final Draft Ipswich Local Plan

19.IP028a – Land adjacent to Jewsons, Greyfriars Road

Representations	Comments	Object	Support
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1	0	1	0
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25899	The Deltic Group	We occupy the night club, Unit 17, which is located to the rear of the proposed redevelopment site. The residential use may result in issues with noise pollution complaints from future residents owing to our use as a nightclub, with music and customers entering and leaving the premises at night.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Site deleted. This is due to the sensitive setting of the site in terms of its constraints and because there is no reasonable prospect of a planning application being made for the development set out in the allocation.

20.IP028b – Jewsons, Greyfriars Road

Representations	Comments	Object	Support
2	0	1	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25900	The Deltic Group	We occupy the night club, Unit 17, which is located to the rear of the proposed redevelopment site. The residential use may result in issues with noise pollution complaints from future residents owing to our use as a nightclub, with music and customers entering and leaving the premises at night.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25638	Private individual	Support - location is totally unsuitable for this kind of business

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

How these comments have been taken into account in the Final Draft Local Plan:

Site moved to policy SP4 as an 'Opportunity Site'.

21.IP029 – Land opposite 674 – 734 Bramford Road

Representations	Comments	Object	Support
1	0	1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25567	Private individual	There have already been two large developments recently and this is last small piece of wild land left. Since the building of the two large developments the population of animals on the site has almost doubled. There is a multitude of Slow-Worms and many other animals need this space including partridges, field mice, monk jack-deers, squirrels and bats. Parking is dreadful, and the new access would pose a serious threat to highway safety. There are no shops or community facilities to serve these houses and the schools are full. The land is needed for nature, dog walkers, and children.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

This site was allocated for housing and amenity land in the Preferred Options version of the emerging local plan but has now been allocated for 1 ha of B1c, B2, B8 employment land plus open space and link road.

22.IP031 – Burrell Road

Representations	Comments	Object	Support
2		2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25548	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP031 (South bank - Residential)

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25675	Boyer on behalf of East of England Co-Operative Society	The site has constraints in the form of flood risk issues and other contamination, which will affect the site's viability and ability to accommodate an entirely residential scheme. A more viable use for the site would be redevelopment to include a multi-storey car park with hotel, although retaining scope for an element of residential as part of a mixed-use approach. It is therefore considered that this site allocation, as currently worded, is not justified as it fails to properly consider viability. As such, it fails to meet the tests of soundness required by paragraph 35 of the NPPF (2019).

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site has been split into two sites (IP031a & IP031b) to reflect the different intentions of the landowners and the submission of recent applications on the eastern side of the site, the most recent of which was recently given a resolution to grant planning permission, subject to S106.

IP031a is formed of the car park which occupies the western portion of the original site. This has an indicative capacity of 20 dwellings (45dph).

IP031b is formed of the eastern part of the original site. The site boundary follows that of pending application 19/00369/FUL. The indicative capacity of this site has been set at 18 dwellings (100dph reflective of highly accessible location – not higher because of heritage constraints).

This site is not suitable for water recreation because of its difficult shape.

The proposed site is designed to form a mixture of higher and lower density dwellings which given the location of the site adjacent to the river should return a reasonable level of viability. (See whole plan viability assessment)

No change

Other changes: Conservation and design comments have been included referencing the proximity of the site to the Stoke Conservation Area; archaeology references have been altered to align with the Archaeology SPD 2018. In addition, development must take account of the River Corridor Buffer (10m).

23.IP032 – King George V Field, Old Norwich Road

Representations	Comments	Object	Support
2		2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25733	Sports England	No objection to this allocation, but we feel the text in relation to the requirements for a replacement facility should be more explicit and should reflect Sport England's policy in relation to replacement playing fields, which states: The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

		<ul style="list-style-type: none"> - of equivalent or better quality, and - of equivalent or greater quantity, and - in a suitable location, and - subject to equivalent or better accessibility and management arrangements.
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25588	Private individual	<p>Support the need to replace the existing playing fields and facilities to an equivalent/ better standard. Adequate parking for any replacement facilities or extension to Whitton Sports Centre is also important.</p> <p>A vehicle exit other than Old Norwich road is essential to avoid use of the Old Norwich road junction with Norwich road and Bury Road. This junction is already over capacity and the development of Tooks site and recently approved development north for 190 dwellings will likely add to this.</p> <p>The road link between this site and Tooks could create traffic problems within the site if not planned correctly.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

The Council agree with the comments made by Sport England, as such the text has been revised to require the replacement facility to be more readily accessible with better management arrangements than the existing facility.

Support for replacement playing fields and facilities is noted. The Council will look to secure facilities of equivalent or better standard as set out within site sheet IP032 and policy DM5 Protection of Open Spaces, Sports and Recreational Facilities. Regarding vehicle access, the site sheet for site IP032 notes that the site has access constraints and requires a transport assessment and travel plan be submitted alongside any application. The transport assessment will focus on the traffic impact of access to Bury Road and the surrounding road network.

Add additional text to the site sheet as outlined below:

The Old Norwich Road junction has received Section 106 money via a recent appeal to fund a mitigation scheme. Further contributions may be required to mitigate the impact from this site.

Other changes:

The Urban Design and Conservation Team have recommended additional wording in the Development Constraints/ Issues section of the site sheet to explain the site context and characteristics. The additional wording also provides guidance to help ensure that future development contributes positively to the character and appearance of the area.

New text in light of Wildlife Audit Update added.

24. IP033 – Land at Bramford Road (Stock’s Site)

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The indicative capacity has been increased from 46 (45dph) to 55 (55dph). This increase has been proposed as a result of the density review as it was considered a greater density could be achieved.

25. IP035 – Key Street/ Star Lane/ Burton’s Site

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25829	Cardinal Lofts (Mill) Ltd	Support the identification of Site IP035, but object to the indicative capacity and lack of express reference to the need to provide parking for both the development itself and

		adjacent sites (IP206 and IP211). The scanned representation provides additional information on this, including the associated abnormal costs of developing the site.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The whole plan viability assessment has considered abnormal costs and sites are considered viable. Site capacity is indicative but reflects the sensitivity of the location and the locality. The additional wording in the site sheet arising from the Urban Design and Conservation Team emphasise the sensitivity of the site. No change.

There are no other changes other than comments from on design and how to treat the historic asset rich sensitivity of the locality and the importance to improve public access in this strategic location. In addition, further detailed bat surveys will be required on the building as well as potentially detailed invertebrate surveys. The recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development.

26.IP037 – Island Site

Representations	Comments	Object	Support
5	0	5	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26152	Suffolk County Council	IP037: 'and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work)' could be deleted and replaced with further information on this from the SPD, to avoid appearing too onerous used alternative wording as suggested.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25889	Associated British Ports	<p>ABP is broadly supportive of the mix of uses for IP037 (subject to preparation of a detailed master plan which ABP will work with IBC to agree).</p> <p>The indicative capacity of 421 homes @ 100 dwellings per hectare stated in the Policy should indeed be considered 'indicative' only. In our opinion, the capacity of the site is greater than 421 homes.</p> <p>For the reasons set out in respect to Policy CS20, we do not consider it appropriate for Policy SP2 to refer to the need for "additional vehicular ... access (including emergency access).to be provided to enable the site's development".</p>
25894	Associated British Ports	<p>IP037 – ABP notes and is generally supportive of the guidance on the Site Sheet, save the reference to the need for the provision of additional vehicular access.</p>
25550	Ipswich Canoe Club	<p>To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP037 (East bank - Residential/ Open Space)</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25640	Private individual	<p>Would support with the Wet Dock Crossings. However, without the main bridge being built building this site will only exacerbate traffic and pollution problems nearby. Therefore, it is contrary to policy DM3 and should be refused.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

The comments from the Archaeology Unit have been incorporated into the site sheet.

The Council does not propose at this time to increase the site’s indicative capacity above 421 dwellings, as the Council wishes to retain the existing employment uses at Haven Marina and provide a minimum of 15% amenity space on the site. However, as noted by ABP 421 is the indicative capacity and the site will be subject to a detailed master plan. The site sheet has expanded the information on the master plan and associated expectations.

The Council is working with neighbouring authorities to understand the cumulative impact on the highways network of growth in the local plan to 2036 using the Suffolk County Transport Model, a strategic highway model. Through the work the Council is developing a programme of mitigation. The site is sustainably located close to public transport and jobs and facilities.

The need to take account of the River Corridor Buffer (10m from the river) has now been identified on the site sheet.

The need to enable greater recreational, leisure and sports use of the River has been stated on the site sheet.

The footpaths and safeguarded minerals facility (within 250m) have been earmarked on the site sheet for reference.

In addition, the site sheet also refers to the need for a contaminated land assessment.

27. IP039a – Land between Gower Street & Great Whip Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The indicative capacity of the site on the site sheet has been increased from 43 dwellings (90dph) to 45 dwellings (95dph). It was considered as part of the density review that the site could accommodate a higher density than originally envisaged.

28. IP040 – Former Civic Centre, Civic Drive (Westgate)

Representations	Comments	Object	Support
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0	0	0	0
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The secondary use on the site sheet has been expanded to include Restaurant (A3) and theatre-related uses. This is taking into account the adjacent theatre use and the potential for the site to contribute positively towards this.

29.IP041 – Former Police Station, Civic Drive

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The indicative capacity on the site sheet has been increased from 46 dwellings (90dph) to 58 dwellings (110dph). This increase has come about as part of the density review of the sites as it was considered that this site had the potential to accommodate a higher density of development. This is because of the site’s sustainable location and the surrounding high density.

30.IP043 – Commercial Buildings, Star Lane

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site name has been amended to remove reference to the “and Jewish Burial Ground”. This is to make it clear that this is excluded from the allocated site.

31.IP045 – Holywells Road East

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26153	Suffolk County Council	This site lies on the edge of the historic channel of the Orwell. There is potential for buried historic deposits. Conditions relating to archaeological work are likely to be relevant on any consent. Desk-based assessment and review of geotechnical data would be appropriate in the first instance.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25568	Imorex Shipping Services	We operate a business unit out of one of these warehouses. If permission to build on this site is granted it would have a severe effect on our business. It would cause massive disruption to us and our customers as well as having a massive cost implication to us. We rent our unit, so we would not benefit from any sale. We would have to find a new site that offers the same facilities and there is a shortage of good quality warehouses for rent. Ultimately this would damage the business enough to enforce a closure and jeopardise jobs.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site has been moved to Policy SP4 as an ‘Opportunity Site’. Please see new policy SP4 within this consultation statement.

The comments from the Archaeology Unit have been factored into the equivalent site sheet for the Opportunity Sites (Appendix 4).

The concerns raised by one of the current operators of the wider site are acknowledged. However, this is anticipated to be a long-term opportunity site and is unlikely to come forward in the early-middle years of the plan period. It is also the prerogative of the land owner to determine how the land in question is occupied or used. The potential allocation of this site as an opportunity site does not in of itself prevent continued business operations from occurring, instead it sets out the Council’s aspiration for the site in the future. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read ‘The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.’

32.IP047 – Commercial Road

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25545	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP047 (North bank - Residential/ Open Space)

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site sheet has been amended to include a sentence regarding the desire to enable greater recreational, leisure and sports use of the River.

The footpath along the site and aspiration to upgrade to a bridleway has been pointed out on the site sheet. This is in response to wider comments made by Suffolk County Council.

The site area has been amended from 2.86ha to 3.11ha to align with the boundary information provided under application 19/00148/OUT.

The indicative capacity has been increased from 103 dwellings (90dph on 40% of site) to 173 dwellings (55dph on 80% of site based on pending application 19/00148/OUT). The secondary uses have been amended from 'Hotel & Leisure and public open space and enhanced river path' to 'Retail and public open space and enhanced river path on the southern boundary'. The indicative capacity of the secondary uses has been reduced from 20% of the site to 15% of the site. These changes are all to reflect the pending application 19/00148/OUT.

Reference to the river corridor buffer requested by the Environment Agency has been added to the site sheet.

33. IP048a – Mint Quarter/ Cox Lane East regeneration area

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25601	Department for Education (DfE)	The DfE strongly supports the allocation for a primary school as part of site IP048a.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25639	Private individual	Masterplan should include land uses that compliment the Regent Theatre by offering restaurants and hotels for people to visit/stay before and after shows at the Regent. This would enhance the visitor experience. Currently as it stands the Regent (the great offering that it is) is dragged down by its surrounding land uses.

The following made no comments in response to this issue.

Parish and Town Councils

**Other Organisations
Developers and Landowners**

How these comments have been taken into account in the Final Draft Local Plan:

Site IP048a has been allocated for a primary school to meet demand for school places in the immediate vicinity. The Borough Council is working with Suffolk County Council to bring forward the site in a timely manner.

The Council is keen to support local arts venues including the Regent Theatre, which draws visitors to the Town. The Council agree that this part of the town would benefit from public realm improvements to enhance the visitor experience. To improve the appearance of the Mint Quarter and Cox Lane area the Council have adopted a Public Realm Supplementary Planning Document which identifies a programme works to enhance this and other areas of the town.

The secondary use indicative capacity has been increased from 47 dwellings (90dph) to 53 (100dph). This increase is on the basis of the density review of sites, particularly due to the sustainable location of the site and surrounding levels of high-density development.

34.IP048b – Mint Quarter/ Cox Lane West Regeneration Area

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

- Parish and Town Councils**
- Statutory Consultees**
- Other Organisations**
- Developers and Landowners**
- Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

The site reference name has been amended to align with other documentation.

The site area has been reduced from 1.57ha to 1.34ha. This is because prior approval (18/00740/P3JPA) has been granted on the north-east corner of the site and therefore this area needs to be discounted from the site area.

The secondary residential indicative capacity has been reduced from 42 to 36. This is to take account of the reduced site area and adjusting the density calculation accordingly.

Suffolk County Council have requested that the relevant footpaths and other public rights of way are highlighted in the supporting text. Therefore, the relevant footpaths have been included accordingly. Also, the opportunity to explore north-south cycling links has been highlighted as a development principle.

35.IP052 – Land between Lower Orwell Street & Star lane (Former Essex Furniture)

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site sheet has been moved to appendix 4 as it has been reallocated as an 'Opportunity Site'. The site is now located under Policy SP4.

36.IP054b – Land between Old Cattle Market and Star Lane

Representations	Comments	Object	Support
2		2	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25559	Plansurv Ltd on behalf of Ortona Properties Ltd	The Cattlemarket bus station is within the opportunity area for Merchants Quarter, however the allocation reference IP054b should be extended north to include this. The Plan states that the redevelopment of Merchants Quarter would provide key linkages from the Waterfront to the town centre. Therefore, the possible future redevelopment of the site could enhance connectivity, providing a pedestrian friendly area to link Turret lane to Dogs Head Lane/ Buttermarket Shopping Centre. The land is under lease as a bus station however given the regeneration ambitions it should be extended north to include the

		opportunity area to allow for comprehensive redevelopment.
25561	Plansurv Ltd on behalf of Ortona Properties Ltd	See attached scanned map showing land ownership to support submission 25559.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The indicative residential capacity has been increased from 31 (55dph on 60% of site) to 40 (60dph on 60% of site). This increase is on the basis of the density review work where it was identified that due to the sustainable location of the site that a higher density may be feasible.

The Council do not propose to make any changes other than increasing the density of the site but a key issue is to ensure connectivity with surrounding development.

The Conservation and Urban Design Team have made a number of design comments in the site sheet for the site to enhance future development of the site and to consideration of heritage assets including the setting of the Central Conservation Area ensuring the sensitivity of the site location in relation to the locality is adhered to.

Although this site is currently of low wildlife value, there is a potential risk that buildings could support bats and consequently an internal inspection by a suitably qualified ecologist is recommended, which will also encompass nesting birds. To achieve biodiversity net gain, the recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development. This has also been taken account of in the site sheet.

37.IP061 – Former School Site, Lavenham Road

Representations	Comments	Object	Support
2	0	2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25586	Suffolk Primary Care	The recreation area is used by the local community regularly. Chantry Park is too far away.

		<p>The area is used by local residents during the summer for picnics and socialising, when the local play bus visits, youth groups to play football and dog walkers.</p> <p>There are parking problems in the area which would be exacerbated.</p> <p>Difficulty accessing the site by lorries and workforce associated with construction. Also noise pollution.</p> <p>The Open Space, Sport and Recreation Study identifies it for informal recreation and it should stay.</p> <p>Instead of more development and congestion, money should be spent on play equipment.</p>
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25585	Private individual	<p>Can you confirm what sort of dwelling this would be as the site notice is incredible vague?</p> <p>The space is not big enough for 30 houses, so would this be flats?</p> <p>Incredibly upset to see the trees have been cut down yesterday when it hasn't been given the go ahead, or has it?</p> <p>I walk my dog around the field regularly and kids use it in the summer.</p> <p>The only other option is to go over the park which isn't well lit or safe.</p> <p>The field is the heart of the community and its loss would be a real shame.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

The site area for housing development has been reduced from 1.08ha to 0.9ha. The residential indicative capacity has been decreased from 30 (40dph on 70% of site) to 23 (40dph on 60% of site). The secondary amenity green space has been increased in terms of site coverage percentage from 30% to 40%. A revised site map has been prepared. All of these changes have taken place due to the granting of planning

permission (18/00991/FPC) on part of the site. This has resulted in a reduction in residential capacity but the amenity green space has been retained at 0.32ha.

The site name has been amended to include 'Former' to make it clear that it is not a currently used school site.

38.IP064a – Land between Holywells Road and Holywells Park

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26030	Suffolk County Council	Additional wording proposed in respect of archaeology for IP064a.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25609	Shallish Associates Ltd on behalf of FIS Property Ltd and Landex Ltd	The allocation for housing is supported and the likely timescale for delivery (M) is considered to be realistic. It is noted that the capacity is 'indicative'. However, it is considered that the indicative capacity of 66 homes is low and, given the site's sustainable location and the character of the area, there is scope for significantly more homes to be provided. Subject to design and ratio of flats/ houses, it is considered therefore that a significantly higher capacity could be achieved. Requested that the indicative capacity and density (55dph) be expressed as minimum to be consistent with Policy DM23.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site name has been amended to be more specific about the site location.

The reference to the proposed roundabout to serve the main Upper Orwell Crossing (TUOC) road bridge has been deleted in light of the cancellation of TUOC.

The comments from the Archaeology Unit have been incorporated into the site sheet. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

39.IP066 – JJ Wilson and land rear at Cavendish Street

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25569	Prestige Car Repairs Ltd	Cavendish Street is a rat-run with cars speeding up and down this road posing a serious risk to highway safety. Traffic regularly queues down Cavendish Street to get onto Felixstowe Road at peak times resulting in oncoming traffic driving up the pavement. When the Orwell bridge there is significant traffic congestion which has an impact on the operation of our business. Double yellow lines were attempted to be painted in 2018 on the corner of White Elm Street but have yet to be implemented. There are high levels of HGV movements. Building 47 houses in a congested area is unacceptable.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Alan Road area has received extensive traffic calming measures which has had a positive impact on the surrounding road network including Cavendish Road. Traffic in the area will be further addressed through a Borough wide initiative to reduce traffic on Ipswich's Road network by encouraging sustainable travel choices.

The site capacity has been increased from 47 (55dph) to 55 (65dph). This is following a review of the density of sites undertaken by officers. The site is located in close proximity to local services and facilities and it is considered that a higher capacity is achievable on this site than previously stated.

40.IP067a – Former British Energy Site

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site name has been amended to include 'Cliff Quay' to make it clearer as to where the site is.

The Highway Authority has recommended that the likely need for signal control and possibly toucon facilities for IP067b.

41.IP080 – 240 Wherstead Road

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26155	Suffolk County Council	Wording could be changed from 'will require' an archaeological condition to 'may require an archaeological condition, subject to development details'.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The archaeology comments in the site sheet have been updated.

42. IP083 – Banks of River upriver from Princes Street

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25547	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP083 (North bank - residential/ open space).

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Remove the housing allocation for 14 dwellings and allocate for open space only.

43. IP089 – Waterworks Street

Representations	Comments	Object	Support
1	0	0	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25680	Boyer on behalf of East of England Co-Operative Society	This site is currently occupied by education centre and associated parking. The Society support this proposed allocation for 23 residential units.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Council notes the current use of the site and the Co-Op’s support for this allocation. Design advice and also the recommendations of the Wildlife Audit 2019 have been added to the Site Sheet.

44.IP096 – Car Park, Handford Road East

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

- Parish and Town Councils**
- Statutory Consultees**
- Other Organisations**
- Developers and Landowners**
- Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

No representations have been made regarding this allocation. However, the site sheet has been changed to incorporate design advice; the need to retain a 10m buffer from the river as requested by Natural England and the need to take account of the findings of the Wildlife Audit 2019.

45.IP098 – Transco, south of Patteson Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

- Parish and Town Councils**
- Statutory Consultees**
- Other Organisations**
- Developers and Landowners**
- Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

No representations have been made regarding this allocation to address. However, the number of dwellings in terms of site capacity has increased from 51 in the Preferred Options version of the plan to 62 as a result of the density review conducted as part of the preparation of the Final Draft Local Plan.

In addition, design advice has been incorporated into the site sheet for the site as well as the need to incorporate the recommendations of the 2019 Wildlife Audit.

46. IP105 – Depot, Beaconsfield Road

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26147	Ipswich Canoe Club	Please consider provision of River Gipping 'portage' easy river access within: IP105 Land allocated for Residential Use

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Environment Agency have requested a buffer zone of 10m from the river where development should not take place. Therefore, as the site falls partially within the buffer zone this has been referred to in the site sheet to help guide any future development. In addition, design advice has been incorporated.

Policy DM10 has been amended to encourage development near the river to enhance public slipway access, where practicable. It is therefore not necessary to explicitly state this in the site sheet.

47. IP119 – Land east of West End Road

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26156	Suffolk County Council	This area is within Archaeological Character Zone 2a as set out in the SPD. Add additional wording as suggested.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25542	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of River Gipping 'portage' access and facilities within IP119 Land for residential use.
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The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Proposed land uses have changed so that it now proposes to accommodate 45% housing (28 dwellings); 40% boat launch facilities and 15% employment.

Policy DM10 has been amended to encourage development near the river to enhance public slipway access, where practicable. It is therefore not necessary to explicitly state this in the site sheet.

48.IP120b – Land west of West End Road

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26031	Suffolk County Council	IP120b This area is within Archaeological Character Zone 2a as set out in the SPD. Add additional wording as suggested.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25543	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (above 'SM Weir') 'portage' access and facilities within IP120b Land for residential use.

The following made no comments in response to this issue.

Parish and Town Councils

**Developers and Landowners
Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

Increased the housing density from 90dph to 125 dph increasing housing numbers from 74 (in the Preferred Options) to 103 dwellings with 20% open space adjacent to the sub-station.

Add new text to site sheet reference IP120b ‘Depending on the nature of the proposed ground works, a condition relating to a programme of archaeological work.

Reference to the River Corridor Buffer (10m) that needs to be in place where no development is allowed.

In addition, reference to the site sheet to refer to the adjacent County Wildlife site and the need to implement recommendations in the Wildlife Audit

Policy DM10 has been amended to encourage development near the river to enhance public slipway access, where practicable. It is therefore not necessary to explicitly state this in the site sheet.

49.IP129 – BT Depot, Woodbridge Road

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26002	Suffolk County Council	The County Council does not support the allocation of site IP129 for housing. A bid has been submitted to the Department for Education to establish a Special Educational Needs and Disability (SEND) Free School on this site. The site is currently owned by the DfE. A high-level feasibility has been undertaken which indicates that a 60-place school could be accommodated on the site in a two-storey building. As such the County Council asks that a policy framework be established to support the delivery of a school on this site.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25603	Department for Education (DfE)	The DfE understands Suffolk County Council is looking to open a SEND school on the Woodbridge Road site (site allocation IP129). We would encourage the council to engage with Suffolk County Council on this and consider re-allocating this site for D1 use to accommodate the proposed school.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

In the light of Suffolk County Council’s request that a policy framework be established to support the delivery of a school on this site, and a bid has been submitted to DfE to establish a Special Education Needs and Disability Free School, this housing site has been deleted from the Final Draft Local Plan.

The site sheet has been deleted.

IP129 has been referenced in Policy SP7 (community facilities) instead.

50.IP132 – Former St Peters Warehouse Site, 4 Bridge Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No representations to respond to.

However, heritage and design comments added to the site sheet because of the sensitivity of the site. In addition, development of this site should also consider the

heritage and design comments provided on the allocated site references IP136 and IP035.

51.IP133 – South of Felaw Street

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25551	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP133 (West Bank - Residential)

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

As the site does not benefit from direct access onto the River it is not considered appropriate to include reference to enhancing water-based recreation in this instance.

The site capacity has been increased from 33 (90dph) to 45 (120dph) to reflect a historic permission and recent pre-application discussions.

52.IP135 – 112-116 Bramford Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No representations made to respond to.

The indicative capacity has been increased from '14 (application 14/00668/OUT)' to '19 (110dph based on location within Local Centre)'. This increase was decided upon as part of the density/ capacity review undertaken by officers. The indicative capacity of 14 equated to 82dph and it was determined that given the availability of services and facilities within walking distance of the site that there may be scope for a higher level of density in this instance.

The Urban Design and Conservation Team has requested additional wording be added to the site sheets to explain the context and site characteristics. In addition, wording has also been recommended to help guide future development to respond positively to the character and appearance of the area. Subsequently, additional wording has been included on the site sheet accordingly.

Development of the site also has to meet the requirements of the 2019 Wildlife Audit.

53. IP136 – Silo, College Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No representations to respond to.

Design and Conservation advice added to the site sheet.

54. IP143 – Former Norsk Hydro, Sandyhill Lane

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Additional comments have been added to the Site Sheet to reflect the findings of the HRA to read: ‘The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.’

55.IP150d – Land south of Ravenswood Sports Park

Representations	Comments	Object	Support
5	0	5	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25849	Ravenswood Environmental Group	This should be described as “land south of Alnesbourn Crescent”. There is no justification for this allocation which is an odd shape to be developed effectively particularly as a neighbouring development to a sports park. The plan is vague about this site. Again, if it is to be proposed then it should be part of a wider allocation. The site has serious nature conservation issues. Unclear how the Sports Park would be integrated with such a strange shape of development. It looks like a frontage development with a Sports Park to the rear, contrary to Designing Out Crime principles.
25850	Ravenswood Environmental Group	No justification for reverting from employment to housing. Traffic impact has not been assessed. Nothing to rule out piecemeal planning applications. The site is visually and ecologically connected to the adjacent nature reserve. Density at 35dph is higher than surroundings. Need for green infrastructure will increase this density. Vagueness about how it will come forward. Without a comprehensive and cumulative assessment of all proposals in this area the piecemeal developments would exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality. A comprehensive proposal must be subject to EIA. Referred to as brownfield but clearly greenfield land.
26118	Ravenswood Residents Association	Cumulative impact of IP150e, IP150d and IP150a (UVW) = 254 dwellings. Recommendations: 1) To be kept informed on the plans which should reflect IBCs undertaking for 65.8% Private Housing and 34.2% Social Housing

		<p>mix.</p> <p>2) Additional new access/egress to Ravenswood to cope with the expected surge in traffic volumes, as already heavy congestion problems at the current /2 roundabout access point during:</p> <ul style="list-style-type: none"> - morning/ evening rush-hours - school drop-off/ pick-up times - lunch times – restaurant traffic particularly the McDonalds queue which blocks roundabouts and prevents traffic going to/ from the busy shopping mall, but also IMPORTANTLY any EMERGENCY VEHICLES.
25635	Suffolk Wildlife Trust	<p>We note that site 150d is allocated for employment use in the current Local Plan as part of site 150b. As with sites 150b and 150d this area, the continued allocation of this area is regrettable as it is an area of wildlife value and forms part of the ecological corridor on the south-eastern edge of the town. Proposals for any development on this site must be informed by survey and assessment of all of the ecological receptors likely to be impacted by the development. Appropriate ecological mitigation and enhancement measures must be embedded as part of any proposal.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25570	Private individual	<p>The current natural area adjacent to Alnesbourn Crescent forms an important part of the natural beauty and wildlife land of Ravenswood. The proposal, especially of IP150d would greatly reduce the natural habitat in the Ravenswood estate.</p> <p>Traffic is already of a major concern to residents on the estate, with the current Ravenswood roundabout congested during both rush hours. The addition of new homes on the estate would put an undue stress on an already stretched junction and there is no detail of how these concerns would be alleviated.</p>

The following made no comments in response to this issue.

**Parish and Town Councils
Statutory Consultees
Developers and Landowners**

How these comments have been taken into account in the Final Draft Local Plan:

It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements.

Additional text has been added to the site sheet to reflect the findings of the HRA to read: 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

Please note, the allocation is for housing use rather than employment and will contribute to meeting the Borough's housing needs.

56.IP150e – Land south of Ravenswood (excluding area fronting Nacton Road)

Representations	Comments	Object	Support
6	0	6	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25851	Ravenswood Environmental Group	No justification for reverting from employment to housing. Traffic impact has not been assessed. Nothing to rule out piecemeal applications. It is visually and ecologically connected to the adjacent nature reserve. Density is higher than surroundings. Existing green infrastructure should be preserved. Need for green infrastructure will increase density. Vagueness about how it will come forward. Without a comprehensive and cumulative assessment of all proposals in this area the piecemeal developments would exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality. A comprehensive proposal must be subject to EIA. Referred to as brownfield but clearly greenfield.

26119	Ravenswood Residents Association	<p>Cumulative impact of IP150e, IP150d and IP150a = 254 dwellings. Recommendations:</p> <p>1) To be kept informed on plans which should reflect IBCs undertaking for 65.8% Private Housing and 34.2% Social Housing mix.</p> <p>2) Additional new access/egress to Ravenswood to cope with the expected surge in traffic volumes, as already congestion problems at the current roundabout access point during:</p> <ul style="list-style-type: none"> - morning/ evening rush-hours - school drop-off/ pick-up - lunch times – restaurant traffic prevents traffic going to/ from the busy shopping mall and IMPORTANTLY EMERGENCY VEHICLES. <p>IP152, IP150e and IP150c need to be master planned with second access point for Ravenswood.</p>
25637	Suffolk Wildlife Trust	<p>We note that site 150e is allocated for employment use in the current Local Plan as part of site 150c. As with sites 150b and 150d this area, the continued allocation of this area is regrettable as it is an area of wildlife value and forms part of the ecological corridor on the south-eastern edge of the town. Proposals for any development on this site must be informed by survey and assessment of all of the ecological receptors likely to be impacted by the development. Appropriate ecological mitigation and enhancement measures must be embedded as part of any proposal.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25571	Private individual	<p>The current natural area adjacent to Alnesbourn Crescent forms an important part of the natural beauty and wildlife land of Ravenswood. The proposal, especially of IP150e would greatly reduce the natural habitat in the Ravenswood estate.</p> <p>Traffic is already of a major concern to residents on the estate, with the current Ravenswood roundabout congested during both rush hours. The addition of new homes on the estate would put an undue stress on an already stretched junction and there is no</p>

		detail of how these concerns would be alleviated.
25555	Private individual	Expresses concern for the allocation for 126 dwellings at site ref IP150e and additional 34 dwellings on site ref IP150d which previously was all going to be part of a sports complex area. The cumulative effect on traffic and the single point of entry to the Ravenswood area and 160 homes will end up making the traffic situation intolerable.
25557	Private individual	Submission accepts the development of Sites U, V and W nearby but believes the development of 150d and 150e will add to the strain on the local infrastructure. IBC is purely looking at available space without recognising that Ravenswood is hemmed in to the town centre to the north west, the A14 to the south and the railway line to the north east. We are boxed in and limited to one point of access. Cramming too many homes onto the development is just crazy.

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements.

Additional text has been added to the site sheet to reflect the findings of the HRA to read: read ‘The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.’

57.IP172 – 15-19 St Margarets Green

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees

Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Design and conservation comments added to the site sheet.

58. IP188 – Webster’s Saleyard site, Dock Street

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25549	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP188 (South bank - residential)

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Reference to 10m river buffer where no development should take place; and the requirement for bat survey investigation prior to demolition as outlined in the 2019 Wildlife Audit.

The site sheet has been amended to encourage slipway or pontoon access and facilities to be considered.

59. IP221 – Flying Horse PH, 4 Waterford Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees

Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No representations made to respond to.

However, the following has been added to the site sheet: The recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development. Also design advice given the complexity of site.

58.IP226 – Helena Road/ Patteson Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No representations made to respond to. This site has been moved to Policy SP4 as an ‘Opportunity Site’. Please see new policy SP4 within this consultation statement.

Also, additional paragraphs added to the site sheet to reflect Design and Conservation comments so that a high-quality scheme can be achieved on this prominent site. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read ‘The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.’

59.IP279 (a,b,and c) – Former British Telecom Office, Bibbs Way

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26033	Suffolk County Council	Site lies largely in Archaeological Character Zone 1d identified in the SPD, the Handford

		Road area, rather than 2a which is quoted, although it is at the boundary between the two- it makes a significant difference, and the text needs replacing (see suggested wording).
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26062	Barton Willmore on behalf of Telereal Trillium Ltd	Telereal is pleased that IBC has allocated the whole of the Bibb Way site (IP279) (1.67ha) for residential development, following the grant of prior approval in 2018. However, the Prior Approval relates only to the 0.7ha (Area 1) and will deliver 104 units. Area 2 (0.39ha) and Area 3 (0.61ha) can deliver a further 49 dwellings without compromising the implementation of the Prior Approval. See comments on CS5, CS7, CS8 and CS12 regarding the need to make optimal use of the site and to increase the density.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Because of the archaeology associated with the site, it is not accepted that the site is capable of the dense dwelling numbers proposed by the objector.

The Bibb Way site (IP279) has been divided into three sites to reflect the granting of prior approval on the central section of the site for an office-to-residential conversion. As the land to the north and south of this does not fall under the prior approval, it needs to be made clear that these two parcels of land are still allocated for residential under Policy SP2. The central element has been recorded under Policy SP3 as it already has prior approval granted.

Master planning work is required in bring the sites forward with the landowner. The IP279 site has been split into three sites to reflect the approval of the recent prior approval (18/00470/P3JPA). As the two remaining parcels of land (IP279b(1) and IP279b(2)) are physically separated by the prior approval, they have been sub-divided into two separate sites. The capacities indicated have been formulated on the basis of early master planning discussions with the site owner. ie IP279b(1) - 18 dwellings and IP279b (2) – 29 dwellings. IP279a is the element with prior approval and this element of the site has been moved to Table SP3 – Land with residential planning permission.

The site sheet has also been expanded to better reflect the 2018 Archaeology SPD findings regarding the site.

In addition, development of IP279b(2) must take account of the River Corridor Buffer (10m) where no development should take place. The findings of the 2019 Wildlife Audit must also be complied with. The site may also need to include early years provision.

60.IP283 – 25 Grimwade Street

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26158	Suffolk County Council	Insert the following additional wording; "The site is on the outskirts of the core of the medieval town. A Post-medieval tile built kiln or oven was recorded immediately to the immediate north, along with potential evidence for a bank associated with a medieval water channel (IPS 440). A condition on any consent would be required. Evaluation in accessible areas should be undertaken as a first stage of work

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission for 14 dwellings and not the 12 dwellings that was originally anticipated. Consequently, as the site has planning permission it needs to be safeguarded under Policy SP3. SP3 sites do not have site sheets and therefore the site sheet must be deleted.

This means that the Suffolk County Council comment is irrelevant to the Site Sheet as it has been overtaken by events.

61. IP307 – Prince of Wales Drive

Representations	Comments	Object	Support
1	0	0	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25676	Boyer on behalf of East of England Co-Operative Society	This site's allocation for residential use is entirely supported by the Society. It is still the Society's intention for the site to be re-developed to provide a residential scheme, which is anticipated to come forward within the next 6-10 years.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Support for the development of this site is noted.

In addition, design and conservation advice has been added to the site sheet to assist developers in providing a high-quality scheme for the site.

To achieve biodiversity net gain, the recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development of the site.

62. IP309 – Former Bridgeward Social Club, 68A Austin Street

Representations	Comments	Object	Support
N/A	N/A	N/A	N/A

This is a new site that has been included in response to comments made on the SHELAA.

How these comments have been taken into account in the Final Draft Local Plan:

This is a new site that has been inserted into Policy SP2 following comments made by the agent (on behalf of the landowner) at the Preferred Options stage.

63. IP346 – Suffolk Retail Park - north

Representations	Comments	Object	Support
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2	0	2	0
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Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26159	Suffolk County Council	Depending on the nature of proposed groundworks, an archaeological condition may be appropriate to secure a programme of works.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26148	Ipswich Canoe Club	Please consider provision of River Gipping 'portage' easy river access within: IP346 Land allocated for Residential Use

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

There has been considerable investment in this successful retail park. Therefore, it has been decided to delete this site from the Final Draft Local Plan as it is no longer considered to be deliverable over the plan period.

64.IP354 – 72 (Old Boatyard) Cullingham Road

Representations	Comments	Object	Support
N/A	N/A	N/A	N/A

How these comments have been taken into account in the Final Draft Local Plan:

This is a new site that has been inserted into Policy SP2 by the Council.

65.IP355 – 77-79 Cullingham Road

Representations	Comments	Object	Support
N/A	N/A	N/A	N/A

How these comments have been taken into account in the Final Draft Local Plan:

This is a new site that has been inserted into Policy SP2 by the Council.

66. Policy SP3 – Land with planning permission or awaiting Section 106

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25830	Cardinal Lofts (Mill) Ltd	The Company supports the intentions underlying Policy SP3 and in particular, the identification of Sites IP206 and IP211. The Company considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The capacities at IP206 and IP211 have not been increased as requested. IP206 (Cranfields) and 211 (Regatta Quay) are both under construction with the permissions referenced in table 2 being implemented. It would therefore be inappropriate to amend these capacities as these are based upon the permissions.

67. IP005 – Former Took's Bakery, Old Norwich Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 ‘Sites with planning permission or awaiting a Section 106 Agreement’ and therefore no longer requires a site sheet.

68.IP042 – Land between Cliff Quay and Landseer Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site has therefore moved to Table 2 ‘Sites with planning permission or awaiting a Section 106 Agreement’ and therefore no longer requires a site sheet.

69.IP059a & b – Arclion House and Elton Park, Hadleigh Road

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26085	Suffolk County Council	Highways: Rights of access through to Hadleigh Road also required. Bridge need not land on the river path but must link to it.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site has therefore moved to Table 2 ‘Sites with planning permission or awaiting a Section 106 Agreement’ and therefore no longer requires a site sheet. The comments from the county council have therefore been overtaken by events.

70.IP074 – Church and land at Upper Orwell Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site has therefore moved to Table 2 ‘Sites with planning permission or awaiting a Section 106 Agreement’ and therefore no longer requires a site sheet.

71.IP088 – 79 Cauldwell Hall Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission. The site has therefore moved to Table 2 ‘Sites with planning permission or awaiting a Section 106 Agreement’ and therefore no longer requires a site sheet.

72.IP109 – R/O Jupiter Road & Reading Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site is awaiting completion of a Section 106. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

73.IP116 – St Clement’s Hospital Grounds

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

74.IP131 – Milton Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils
Statutory Consultees
Other Organisations
Developers and Landowners
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

75.IP142 – Land at Duke Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

76.IP150a – Ravenswood U, V, W

Representations	Comments	Object	Support
2		2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25843	Ravenswood Environmental Group	This site is allocated by SP3 but it doesn't particularly fall within that category. It's debatable whether this site can be delivered based on the 2007 Permission following the refusal of Reserved Matters Consent so long ago. Given that the Council's strategy for the site has been rejected by the Planning Inspectorate, it's essential that the Local Plan contains a criteria-based policy saying in what circumstances a detained planning permission would be granted. The Local Plan gives decision makers no direction about the site's future. The SHELAA refers to this site as a brownfield site but is clearly greenfield.
26120	Ravenswood Residents Association	Cumulative impact of IP150e, IP150d and IP150a (UVW) = 254 dwellings. Recommendations: 1) To be kept informed on the plans which should reflect IBCs undertaking for 65.8% Private Housing and 34.2% Social Housing mix. 2) Additional new access/egress to Ravenswood to cope with the expected surge in traffic volumes, as already heavy congestion problems at the current /2 roundabout access

		<p>point during:</p> <ul style="list-style-type: none"> - morning/ evening rush-hours - school drop-off/ pick-up times - lunch times - restaurant traffic particularly the McDonalds queue which blocks roundabouts and prevents traffic going to/ from the busy shopping mall, but also IMPORTANTLY any EMERGENCY VEHICLES.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site has outline planning consent. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

The transport modelling work is based on cumulative developments which includes 94 dwellings anticipated for this site. This will consider the impact on junctions from other nearby developments including the Ravenswood allocations.

77.IP161 – 2 Park Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

A 2019 planning application decision is pending. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

78.IP165 – Eastway Business Park, Europa Way

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

79.IP169 – 23-25 Burrell Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

80.IP200 – Griffin Wharf, Bath Street

Representations	Comments	Object	Support
1	1	0	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25552	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and

		facilities including boat storage facilities within IP200 (West bank - Planning Permission).
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site has planning permission pending. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

81. IP205 – Burtons, College Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

82. IP206 – Cranfields, College Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

83.IP211 – Regatta Quay, Key Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

84.IP214 – 300 Old Foundry Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site now has planning permission. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

85.IP256 – Artificial Hockey Pitch, Ipswich Sports Club

Representations	Comments	Object	Support
1	0	1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26138	Private individual	<p>The housing number (18) is inconsistent with the nature of the surroundings.</p> <p>Traffic access to/ from the site will cause danger to pedestrians and cyclists.</p> <p>Furthermore Henley Road will become increasingly congested as development of the IGS progresses and will lead to queuing to leave the site at busy times, lowering air quality.</p> <p>If development is allowed this would be an ideal site for sheltered units for elderly people as this is unlikely to result in traffic problems at busy times and would release homes elsewhere.</p> <p>The 47dph density is far from the low density intended for this area.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

This site is awaiting completion of a Section 106. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

86. Policy SP4 – Opportunity Sites

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This is a new policy that has been added at the Final Draft stage of plan preparation. Therefore, there were no comments received at Preferred Options stage.

87. Policy SP5 – Land allocated for employment use

Representations	Comments	Object	Support
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1	0	1	0
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26146	Ipswich Canoe Club	<p>Please consider provision of public slipway access to the upper River Orwell within: E9 Riverside Industrial Park and the West Bank area (West Bank), and E12 Cliff Quay/Sandy Hill Lane / Greenwich Business Park / Landseer Road area (East Bank)</p> <p>Please consider provision of River Gipping 'portage' easy river access and facilities, including possible canoe/kayak storage facilities within: E4 Boss Hall Industrial Estate</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The comments relate to the defined Employment Areas listed in Policy DM33 (Protection of Employment Land). Policy SP5 concerns new employment allocations. Nevertheless, the employment areas do represent opportunities to improve recreational access to the rivers. However, the ability to incorporate public slipway access into employment sites will not always be practicable and therefore it needs to be acknowledged that this can't be sought in all circumstances. As a result, Policy DM10 (Green Corridors) has been amended to facilitate public slipway access where feasible.

IP011b has been removed from Table 3. This is because IP011b has been amended to remove the employment aspect. This is due to the need to increase the housing capacity of Ipswich to help meet Ipswich's housing target and improve the delivery of housing in the Borough. As the Local Plan identifies a minimum employment land requirement of 23.2ha and the Council has allocated 28.34ha of land, the Council has reviewed its employment sites. As IP011b is situated close to the air quality management area the B1(a) office use anticipated may increase vehicle movements and make the plan objective of tackling air quality more challenging, in comparison to some of the other employment allocations in Table 3. Therefore, in light of the demand

for housing and over-supply of employment land, it was felt appropriate to remove the employment aspect of the allocation.

IP147 has been removed from Table 3. This is because the development granted under planning permission 18/00534/FUL has commenced. Consequently, there is no longer a need to safeguard this land for employment development.

IP029 has been reallocated from residential to circa 1ha of employment uses. IP119 has been reallocated from residential to a residential-led mixed use allocation which includes approximately 0.1ha of employment uses.

To reflect the removal of the two allocations and the insertion of the two sites listed above, the total amount of employment land safeguarded under Policy SP5 in Table 3 has been reduced from 32.2ha to 28.34ha.

88.IP067b – Former British Energy Site

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26086	Suffolk County Council	Highways: Likely to require signal control of Landseer Road/ Sandyhill Lane as mitigation. Toucan facility in signals represent an opportunity to improve sustainable access.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The existing site sheet highlights that the site has access constraints and the need for a transport and travel plan. The Council has updated site sheet IP067 requiring signal control on Landseer Road and Sandyhill Lane and a Toucan facility.

Suffolk Wildlife Trust have recommended additional wording which has been incorporated into the site sheet. Comments from the Urban Design and Conservation Team wording have been included in the site sheet to highlight the context and site characteristics. In addition, guiding principles for future development have been proposed.

89.IP094 – Land to rear of Grafton House

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26087	Suffolk County Council	Highways: Access constraints - Access from West End Road may not be acceptable. Low car parking required.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Additional wording has been added to the relevant site sheet to read:

An alternative link to Constantine Road should be investigated, with a potential opening up of the West End Road/Constantine Road junction to address possible access issues from West End Road.

Other changes include design and conservation comments referencing the context and the need to have regard to the setting of the Grade II listed Paul's Maltings. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

90.IP140 – Land north of Whitton Lane

Representations	Comments	Object	Support
3	2	0	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26032	Suffolk County Council	There has been progress on this site. Delete everything from 'Detailed discussions will be required with Suffolk County Council Archaeological Service'... Replace with:

		This site has been subject to geophysical survey and trenching, which has confirmed that cropmarks visible on it relate to Bronze Age and Iron Age archaeological remains in particular, including a settlement, with some Roman activity. Conditions on any consent will be required to secure programmes of archaeological investigation, analysis, archiving and public dissemination of information. Suffolk County Council Archaeological service can advise on the scope of works.
26088	Suffolk County Council	Highways: - Public rights of way improvements as a mitigation and opportunity to improve sustainable access. - Site is likely to have a significant on junction already under strain (Anglia PS/ Bury Road) and junction (capacity) enhancement may be necessary to avoid cumulative residual severe impact.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25938	Ashfield Land Limited	Support the recognition that the site could be suitable for B1, B2 or B8, together with other appropriate employment-generating sui generis uses. Part of the site already benefits from planning permission for a B8 led development. We also note reference to the site being planned comprehensively as part of a larger scheme with adjacent land in Mid Suffolk. There is an outline permission for up to 190 dwellings allowed at appeal (3200941) on adjacent land. The landowner intends to promote the remainder of the site (extending to the north of the permitted development) for future residential development.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The archaeology references have been updated in the site sheet to reflect the contents in the Archaeology SPD and in the County Council’s objection.

The Council also notes the land owners intention to plan the site comprehensively with land to the north of the site in Mid Suffolk which already has the benefit of outline planning permission.

Other changes to the site sheet include design and conservation comments reflecting the proximity of designated and non-designated heritage assets and the Whitton Conservation Area. As well as design and materials advice including the requirement of a comprehensive landscaping strategy.

Old Norwich Road/Bury Road and Whitton Church Lane junctions both have contributions from the recent appeal site. It is likely that this site will need to contribute to a larger mitigation package for these junctions.

91.IP141a (1) & (3) – Land at Futura Park, Nacton Road

Representations	Comments	Object	Support
5	1	4	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26089	Suffolk County Council	Highways: Site is likely to have a significant on junction already under strain and junction (capacity) enhancement may be necessary to avoid cumulative residual severe impact.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25809	AONB	Futura Park lies within 200m of the boundary of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and is therefore considered to be within the setting of the nationally designated landscape. Whilst we acknowledge that much of this site is already built out and is physically separated from the AONB by the A1189, any future development applications, especially site IP141a should be supported by an

		assessment of impacts on the Natural Beauty of the AONB. This includes use as a Park and Ride site as indicated in para 4.4, of Policy SP9 (Safeguarding land for transport infrastructure).
25855	Ravenswood Environmental Group	The traffic impacts of this development must be assessed cumulatively along with the 24 hectares of development proposed at Ravenswood.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25721	Freeths LLP on behalf of AquiGen	<p>Consider that site 1 (appendix 1) should be removed because:</p> <ul style="list-style-type: none"> - Futura Park has had extensive marketing since early/ mid 2012. - There has been no interest in the frontage plot for B Class uses consistent with the 2011 permission; - It has attracted no interest despite being serviced and benefiting from a permission; - The New Anglia Enterprise Zone in 2016 has not led to new interest; - The plot has a different townscape character to the remaining parts of Futura park; - Could accommodate other non-B class uses; and - There is interest in sites 6 and 7.
25722	Freeths LLP on behalf of AquiGen	<p>There is no reasonable prospect of site 1 being used for employment purposes. There has been more than 12 months active marketing. The removal of the plot will have no material impact on employment land supply in Ipswich as there is already an over-supply of proposed allocations. The removal of this 1.22ha plot will result in a residual land supply of 30.98ha. The removal of the site also leaves circa 26ha of suitable industrial land in excess of the 9ha required. To comply with NPPF paragraph 120 there is justification to de-allocate site 1 and consider a more deliverable use.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

It is accepted that the site is likely to require junction capacity enhancements from the A1189 / Nacton Road to A1156 Warren Heath junctions. A transport assessment and travel plan will be required. This has been added to the site sheet for the site.

Site 2 is currently being developed and therefore has been removed as an allocation. The site scored highly in the ELSA and is one of Ipswich’s prime employment sites and therefore should remain an employment site. It is greenfield, located close to major transport networks and well designed. Therefore, no change is recommended.

Other changes to the site sheet include reference to the need for surveys for reptiles, bats and detailed terrestrial invertebrate surveys are required. The recommendations of the Ipswich Wildlife Audit 2019 should also be considered for inclusion in future development.

In addition, design advice has been included including the need for a landscaping buffer.

92.IP147 – Land between railway junction and Hadleigh Road

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26090	Suffolk County Council	Highways: - Potential foot/cycle bridge landing near former flood gate represents opportunity to improve sustainable access; and - Site is likely to have a significant on junction already under strain and junction (capacity) enhancement may be necessary to avoid cumulative residual severe impact.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site is now under construction and therefore it is no longer allocated.

93.IP150c – Land south of Ravenswood

Representations	Comments	Object	Support
3	2	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26091	Suffolk County Council	<p>Highways:</p> <ul style="list-style-type: none"> - Contrary to town centre first policy for offices. - Site IP152 needs access most likely through a junction to the A1189 through this site; - It does not appear that safe and sustainable access can be made to the site; - Left-in left-out access through IP150b required to mitigate impact; - Foot way along perimeter track represents opportunity for sustainable access improvement; and - Site is likely to have a significant impact on junctions already under strain and junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25847	Ravenswood Environmental Group	The Land Adjacent to Nacton Road does not appear in the SA and the site sheet for site IP150e suggests that this site should be master planned with IP150c but there is no policy to insist upon it. There should be a criteria-based policy stating how the site can be delivered as part of a masterplan.
26121	Ravenswood Residents Association	<p>Is the Access to this B1 site for offices etc. to be via the new IP150e 126 housing development? This would need to be master planned.</p> <p>The 3 phases of IP152, IP150e and IP150c need to be coordinated and Master Planned with a second ACCESS/EGRESS point for Ravenswood, as with the existing single point of access into and out of Ravenswood already not coping at the specified times of day, then forward planning becomes an absolute must,</p>

		otherwise grid-lock will come into play very rapidly.
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The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The allocation through policy SP5 has been clarified to exclude B1a office use, as it is a town centre use. It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements. It is confirmed that the site is considered through the sustainability appraisal published for this stage of the plan.

94.IP152 – Airport Farm Kennels

Representations	Comments	Object	Support
6	2	3	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26092	Suffolk County Council	Highways: - Does not appear that safe and sustainable access can be made to the site; - To mitigate this it would need to access through IP150a and b; - Diverting FP1 to crossing on Nacton Road represents a sustainable access improvement opportunity; and - The site is likely to have a significant impact on junctions already under strain and junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact.
26157	Suffolk County Council	Recommended that an additional sentence has been added.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25811	AONB	The AONB team welcomes the requirement to assess the impact of developing this site on the Natural Beauty of the Suffolk Coast Heaths AONB. We would be happy to discuss the scope of an AONB impact assessment at the appropriate stage of the planning process for inclusion in the proposed Development Brief for this site.
25853	Ravenswood Environmental Group	The plan hints that the site may allow the creation of a new access onto and improvements to the Nacton Road. The Site Sheet sets out a raft of constraints, yet the site continues to be allocated for development. Alarmingly, the only guidance is that the industry should be as far from the A14 as possible meaning closer to residential. The site has archaeological, ecology, surface water, noise and air quality issues which dictate that it shouldn't be allocated. No work has been carried out to prove that this is a developable without harmful impacts on protected areas.
25854	Ravenswood Environmental Group	The plan hints that the site may allow the creation of a new access onto and improvements to the Nacton Road. The Site Sheet sets out a raft of constraints, yet the site continues to be allocated for development. Alarmingly, the only guidance is that the industry should be as far from the A14 as possible meaning closer to residential. The site has archaeological, ecology, surface water, noise and air quality issues which dictate that it shouldn't be allocated. No work has been carried out to prove that this is a developable without harmful impacts on protected areas.
26122	Ravenswood Residents Association	This is designated for <ul style="list-style-type: none"> - B1 (offices, R & D, light industrial) - B2 (general industrial) - B8 (storage/distribution) - And as a SECONDARY USE - Feasibility of a small section for Park & Ride It is recognised that this development currently poses ACCESS constraints - which would also need to be master planned comprehensively with the aforementioned IP150e and IP150c mentioned above. IP152, IP150e and IP150c need to be master

		planned with second access point for Ravenswood.
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The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Council welcomes the AONB team’s response to discuss the site further. It is accepted that there are highway issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues.

Locating a small park and ride site would be advantageous and help to mitigate transport impact on Ipswich. It is not accepted that this allocation is unsuitable for the uses proposed. The Council will balance the needs to protect residential amenity with the needs of the AONB and highway requirements. Additional text has been added to the site sheet to reflect the findings of the HRA to read: ‘The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.

95.IP005 – Former Took’s Bakery, Old Norwich Road

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26093	Suffolk County Council	<p>Highways:</p> <ul style="list-style-type: none"> - It does not appear that safe and sustainable access can be made to the site; - Land required for junction vehicular capacity and pedestrian and cyclist improvements as a likely mitigation measure; - Toucan facilities represent an opportunity to improve sustainable access; - The site is likely to affect a location with a significant number of recorded accidents (Bury Road/ Old Norwich Road); and - The site is likely to have a significant impact on junctions already under strain and junction (capacity) enhancements are not likely to be necessary to avoid cumulative residual severe impact.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This site has planning permission and is currently being developed.

96.IP051 – Old Cattle Market, Portman Road - South

Representations	Comments	Object	Support
0	0	0	0

Statutory Consultees

The following made no comments in response to this issue.

Statutory Consultees

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Additional design advice from the Urban Design and Conservation Team has been inserted into the site sheet.

97.IP150b – Land at Ravenswood

Representations	Comments	Object	Support
4	3	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26094	Suffolk County Council	Highways: - It does not appear that safe and sustainable access can be made to the site; - Access through IP150a or via perimeter track following major scheme for sites 150c, 152d and 152; - Provision of footway along perimeter track is an opportunity to improve sustainable access; and - Site is likely to have a significant impact on junctions which are already under strain and

		junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25846	Ravenswood Environmental Group	The Plan does not qualify/ explain what the Sports Park is. The SA suggests this is just open green space that can sit comfortably with an adjacent Nature Reserve and SPA but it may be that built development, traffic, parking, lighting, evening activities and noisy activities. Plans should serve a clear purpose. If it's for predominantly open space then a Sports Park should be in Policy SP6. Residents are entitled to read the Local Plan and have certainty as to what is permissible here. The site is valued as a green space and for its ecological and visual value.
26123	Ravenswood Residents Association	ACCESS to this Sports Park site will also need to be specified, as presumably access from Alnesbourne Crescent would need to be made, it would appear, through the proposed new housing development on IP150d.
25634	Suffolk Wildlife Trust	Whilst we note that the allocation of this site for sports use is carried forward from the current adopted Local Plan this is regrettable. As recognised in the supporting sheet for the site, it is an area of wildlife value and forms part of the ecological corridor on the south-eastern edge of the town. Proposals for any sports facilities on this site must be informed by survey and assessment of all of the ecological receptors likely to be impacted by the development. Appropriate ecological mitigation and enhancement measures must be embedded as part of any proposal.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements.

Additional text has been added to the site sheet to reflect the findings of the HRA to read: 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

The sports facilities needed for the park are yet to be identified and this is tied up with the current sports provision review being undertaken by the Council. However, the site sheet flags up the ecological considerations.

98. Policy SP8 – Orwell Country Park Extension

Representations	Comments	Object	Support
4	1	2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25769	Natural England	The LPA should be confident that Policy SP8 will be effective in offsetting recreational impacts to the designated Orwell Estuary. The success of the park extension will depend on the details of the proposal. We advise that these details are assessed to ensure the project is fit for purpose. We would encourage Policy SP8 to include appropriate provision such as access to the coast path across this land. The England Coast Path will be subject to its own HRA, separate from Ipswich Borough Local Plan. Currently in discussion with Ipswich Borough Council about the coast path route in this area.
26095	Suffolk County Council	Highways: - Public Rights of Way dedication represents opportunity to improve sustainable access.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25815	AONB	The AONB team fully supports policy SP8 to include Pond Hall Carr and Farm into the existing Orwell County Park. Including this land, as well as providing additional new habitat, will increase recreational opportunities with the Country Park. This could potentially alleviate recreational pressure on the Orwell Estuary Special Protection Area.
25856	Ravenswood Environmental Group	Extension does not resolve existing poor management. Motorcycles ridden on the foreshore and dogs running free. The development of land at Ravenswood adds to visitor pressures but no mitigation. Contradiction at 4.38 because the development at Ravenswood mustn't have an impact on the SPA yet seeks to improve footpaths/ viewpoints while discouraging access. Existing residents do not want access to the Orwell restricted while tolerating disproportionate growth. Country Park remains accessible by unauthorised vehicles and suffers fly-tipping and vandalism. The cause of this is proximity with residential and the solution lies with better management and greater distance to residential.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Plan has been subject to assessment under the Habitat Regulations to ensure no significant effects on the Special Protection Area resulting from the country park proposal. The proposal at Pond Hall Farm has the purpose of managing recreational impacts more effectively by providing circular walking routes away from the shore, but still offering longer distance views across the estuary.

The decision about whether to dedicate the routes as rights of way would be taken once they are established outside the scope of the plan.

The proposal at Pond Hall Farm has the purpose of managing recreational impacts more effectively by providing circular walking routes away from the shore, but still offering longer distance views across the estuary.

99. Policy SP9 – Safeguarding land for transport infrastructure

Representations	Comments	Object	Support
4	3	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26022	Suffolk County Council	County would welcome the opportunity, as part of a broader discussion to promote sustainable transport, to discuss these proposed measures such as Park and Ride sites and improved sustainable links such as pedestrian/cycle bridges as means of developing a holistic package of improvements.
26096	Suffolk County Council	Highways: - In relation to the two park and ride sites (Anglia Parkway & IP152) it should be noted that Suffolk County Council are not proposing to fund these services.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25810	AONB	Any future development especially site IP141a should be supported by an assessment of impacts on the Natural Beauty of the AONB. This includes use as a Park and Ride site as indicated in para 4.4 of Policy SP9 The need for such an assessment should be reflected in any future site-specific policy for this site. The AONB team would be happy to discuss the scope of the AONB impact assessment at the appropriate stage of the planning process.
25890	Associated British Ports	For the reasons set out in respect to CS&P DPD Review Policy CS20 (and para 8.225) and in respect of Site Allocations & Policies DPD Policy SP2 (IP037), we request the removal of the reference to "additional vehicular access needed to enable the site's development".

The following made no comments in response to this issue.

**Parish and Town Councils
Developers and Landowners
Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

The Council is in discussions with Suffolk County Council and neighbouring districts to identify measures needed to support growth, and a mechanism for gathering developer contributions for transport. The added text makes this clear.

The plan is looking ahead to 2036. By then the operation of park and ride services from either location mentioned in the policy could form a key component of a sustainable travel strategy. Therefore, the option needs to be retained and this means protecting the site(s).

IP141A Futura Park is separated from the AONB by over 500m, which includes the Ravenswood Development, Ransomes Europark and the A14. Therefore, a requirement to undertake an impact assessment would be unreasonable. However, this requirement has been added to the development allocation IP152 Airport Farm which lies adjacent to the AONB and includes a small section of the AONB.

It is the Council's understanding that additional access is required by the Highway Authority to enable the Island Site to come forward for development.

100. IP037 – Island Site

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26023	Suffolk County Council	The cancellation of TUOC will necessitate an amendment to this policy in respect of IP037. The County Council has committed £10.8m to contribute towards delivering crossings at Felaw Street (formerly known as Crossing B) and another at the Prince Phillip Lock (formerly known as Crossing C) to help enable the delivery of the Island site.

The following made no comments in response to this issue.

**Parish and Town councils
Other Organisations
Developers and Landowners
Members of the public**

How these comments have been taken into account in the Final Draft Local Plan:

The Upper Orwell Crossings project is not referred to in the policy, which retains the ‘Wet Dock Crossing’ title from the adopted Local Plan. This aligns with the explanatory text to policy CS20, which explains the relationship between the two crossing proposals.

The comments from the Archaeology Unit have been incorporated into the site sheet.

The Council does not propose at this time to increase the site’s indicative capacity above 421 dwellings, as the Council wishes to retain the existing employment uses at Haven Marina and provide a minimum of 15% amenity space on the site. However, as noted by ABP 421 is the indicative capacity and the site will be subject to a detailed master plan. The site sheet has expanded the information on the master plan and associated expectations.

The Council is working with neighbouring authorities to understand the cumulative impact on the highways network of growth in the local plan to 2036 using the Suffolk County Transport Model, a strategic highway model. Through the work the Council is developing a programme of mitigation. The site is sustainably located close to public transport and jobs and facilities.

The need to take account of the River Corridor Buffer (10m from the river) has now been identified on the site sheet.

The need to enable greater recreational, leisure and sports use of the River has been stated on the site sheet.

The footpaths and safeguarded minerals facility (within 250m) have been earmarked on the site sheet for reference.

In addition, the site sheet also refers to the need for a contaminated land assessment.

In order to ensure that the development principles outlined in Opportunity Areas are adhered to in their future development, appropriate reference has been included to Policy CS3. Additional text has been added to the Site sheet to read: read ‘The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.’ To reflect the findings of the HRA.

101. Chapter 5 – IP-One Area

Representations	Comments	Object	Support
2	1	0	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25966	Environment Agency	Paragraph 5.19 states that "the flood defence barrier is important for the release of development sites at the waterfront (and the wider area in the flood zone). It has been largely completed in 2018." The Ipswich Flood Defence Management Strategy (IFDMS) is now complete and the Tidal Barrier is operational. The final commissioning of the main barrier and all the associated gates has been completed. There remains a residual risk of tidal flooding and there is also a residual risk of fluvial flooding as well as a risk from other sources of flooding to consider as well.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25831	Cardinal Lofts (Mill) Ltd	The Company supports the general vision for the IP-One area (see also representation made with respect to Core Strategy Chapter 6: Vision and Objectives and Spatial Strategy).

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Paragraph 5.19 has been amended to confirm that the flood defence barrier has been completed.

102. Policy SP10 – Retail site allocations

Representations	Comments	Object	Support
3	0	1	2

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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26034	Sproughton Parish Council	Expresses concerns about extra traffic being generated through Sproughton Village, which is already over congested, by changes in use proposed for the Boss Hall area as proposed B class employment land. Although much traffic can access from the A14 junction, for traffic from the rural areas to the West such as from Hadleigh the only logical route is through Sproughton and the Wild Man Junction.
26037	Sproughton Parish Council	The Council liked the fact that redundant sites are coming up in the new local plan, such as the old Mecca Bingo site in central Ipswich. This should be encouraged further to avoid the use of building on greenfield in villages when there isn't the sustainability or need to do so.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25697	Boyer on behalf of East of England Co-Operative Society	The exact location of the proposed retail allocation at Boss Hall Road does not appear to have been identified by the Council. The Society support this new retail allocation at the Boss Hall Business Park. Four A1/A3 retail units are proposed as part of planning application reference 18/00848/OUTFL comprising a total of 448 sq. m, adjacent to Sproughton Road. Policy SP10 should be updated to reflect this as the location for the retail allocation.

The following made no comments in response to this issue.

Statutory Consultees

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Highway Authority did not raise any objection to the proposed District Centre at the Boss Hall Industrial Estate. The Planning and Development Committee resolved to grant planning permission (18/00948/OUTFL) on 24 July 2019, subject to completion of a S106 agreement, for the uses and development associated with the district centre here. Suffolk County Council also raised no objection to the proposal subject to various transport/ highways related conditions, including a Traffic Regulation Order to improve waiting times at junctions nearby and a Travel Plan. In addition, the district centre would primarily serve residents within walking and cycling distance of

the site. It would not be of such a scale as to serve a wider catchment, such as an out-of-town retail park.

The Council will continue to identify redundant sites where available and seek to maximise effective use of brownfield land whenever possible as required under paragraph 118(c) of the National Planning Policy Framework (2019).

The location of the Sproughton Road District Centre has been more clearly defined on the Proposals Map to reflect permission 18/00948/OUTFL which has received a resolution to grant planning permission since the Preferred Options version of the Local Plan. It also recognises the development permitted for a retail foodstore approved under permission 15/00105/FUL.

The policy text has been amended to match the net floorspace of the retail allocation at the Sproughton Road District Centre with the retail development proposed under permission 18/00948/OUTFL. The net figure of 315sq m net was formulated on the basis of the Retail Assessment (Boyer) dated September 2018 which accompanied permission 18/00948/OUTFL.

103. IP347 – Mecca Bingo

Representations	Comments	Object	Support
0	0	0	0

No comments were made

How these comments have been taken into account in the Final Draft Local Plan:

Additional comments from the Urban Design and Conservation Team have been incorporated into the site sheet.

104. IP348 – Upper Princes Street

Representations	Comments	Object	Support
0	0	0	0

No comments were made

How these comments have been taken into account in the Final Draft Local Plan:

Additional comments from the Urban Design and Conservation Team have been incorporated into the site sheet.

105. Policy SP11 – The Waterfront

Representations	Comments	Object	Support
2	0	0	2

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25891	Associated British Ports	ABP supports Policy SP11 and welcomes the recognition at para 5.21 of the need for new development to take account of the Port's operational needs.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25832	Cardinal Lofts (Mill) Ltd	The Company fully supports this policy.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No changes.

106. Policy SP12 – Education Quarter

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this policy.

How these comments have been taken into account in the Final Draft Local Plan:

No changes.

107. Policy SP13 – Portman Quarter (formerly Ipswich Village)

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this policy.

How these comments have been taken into account in the Final Draft Local Plan:

No changes.

108. Policy SP15 – Improving pedestrian and cycle routes

Representations	Comments	Object	Support
3	0	2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25579	Theatres Trust	As referenced within our formal response to recent planning applications and within our representation on the draft Public Realm Strategy submitted alongside these comments, we are supportive of efforts to improve the environment and pedestrian connectivity and permeability around the New Wolsey Theatre.
26001	Suffolk County Council	County will discuss these measures specifically with IBC, as part of work to determine a package of measures to promote healthy and sustainable travel, and ensure the Plan is deliverable. Pedestrianisation of some roads in the town centre may be desirable, but this would need to be tested for impacts on other modes (such buses) and for wider highway impacts. Should be more specifically linked to public rights of way opportunities and should include wording to the effect of: Linkages and enhancements to the public rights of way network beyond Ipswich. Comments on specific sites are included in Appendix 4.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25833	Cardinal Lofts (Mill) Ltd	The Company supports the general thrust of the Policy, including the proposals to improve pedestrian links between the Central Shopping Area and the Waterfront. However, there are serious concerns about how these proposals impact upon the development of Site IP035 (see representations relating to the Merchants Quarter).

The following made no comments in response to this issue.

Parish and Town Councils
Other Organisations
Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy is extended to cover Ipswich-wide measures, to ensure that they are listed and link up with policy SP9 which safeguards the land needed for their delivery. The principle of seeking public rights of way enhancements linked to development is addressed primarily through policy DM21. Reference has been added to cross boundary links to the rights of way network, for completeness. The need for improved walking routes between the Waterfront and Central Shopping Area is an objective of the adopted Local Plan and the Opportunity Area B development option map illustrates one way in which it could be delivered through routes around site IP035.

Regarding pedestrianisation options, more detailed forthcoming plans and strategies such as the Local Transport Plan update and the Walking and Cycling Infrastructure Strategy will provide the mechanism through which to consider impacts.

109. Policy SP16 – Transport proposals in IP-One

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26024	Suffolk County Council	Following the recent announcement on TUOC, the County continues to support provision of increased east-west capacity. However, the measures set out in this policy (and as shown on the policies map) are not necessarily the same proposals as set out in SP9 and relate to untested routes which may not be deliverable. We would be pleased to discuss this further.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25892	Associated British Ports	ABP supports Policy SP16 and notes the comments at para 5.47 in respect of IBC's continuing aspirations for a Wet Dock Crossing (see comments on CS&PDPD Policy

		CS20). For the reasons given above, we request the removal from para 5.47 of the reference to "which as a minimum will require a road bridge from the west bank to the Island Site..".
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**Parish and Town Councils
Developers and Landowners
Members of the public**

No comments were made in response to this issue.

How these comments have been taken into account in the Final Draft Local Plan:

The policy has been amended to bring the policy up to date to reflect the Highway Authority’s work on the feasibility of the Upper Orwell Crossings, and their decision not to proceed with all the components of the Upper Orwell Crossings project.

It is the Council’s understanding that additional access is still required to enable the redevelopment of the Island Site. The policy and supporting text set out the minimum improvements needed to enable development, but some minor updates have been made to ensure this is clear.

110. Policy SP17 – Town Centre car parking

Representations	Comments	Object	Support
3	0	2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26154	Suffolk County Council	IP049: This is in character zone 2b in the SPD. Comments could be moderated, with an amended last paragraph relating to archaeology as suggested.
26025	Suffolk County Council	Provision of car parking is complicated, reflecting the need to balance support for economic vitality with managing congestion and air quality. This matter needs further consideration as part of our broader discussions on maximising sustainable transport opportunities. The proposals to encourage redevelopment of the temporary car parks, through preventing renewal of parking permissions, is welcomed. County would welcome discussion on how evidence will be used to manage the process by which permissions are refused.

		Consideration should be given to extent of central parking core. For example, it isn't clear why the western side of Princes Street is excluded.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25816	AONB	The AONB team welcomes the requirement in policy SP17 for all new permanent car parks to include electric vehicle charging points. This will help meet objective 11 in the emerging Local Plan.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The policy has been updated to reflect the Ipswich Parking Strategy which advises on the number of additional parking spaces needed and where they should be located. The site sheet for site IP049 has been amended as requested in relation to archaeology.

111. Opportunity Areas A – Island Site

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25893	Associated British Ports	ABP questions the references in the text to: -Residential 50% (IP037 says c.70%); -Generally low to medium rise development (3, 4 and 5 storeys) (IP037 say minimum 100dph density); -Development to provide vehicular access (including emergency vehicles) and bridge across New Cut to link to Mather Way; -Layout to facilitate location of new foot/cycle bridge from New Cut to St Peter's Wharf (it is

		<p>not clear what this means);and - Ensure suitable public transport provision (it is not clear how this is expected to be achieved). Request removal of "3, 4 and 5 storeys".</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The comments from the Archaeology Unit have been incorporated into the site sheet.

The Council does not propose at this time to increase the site’s indicative capacity above 421 dwellings, as the Council wishes to retain the existing employment uses at Haven Marina and provide a minimum of 15% amenity space on the site. However, as noted by ABP, 421 is the indicative capacity and the site will be subject to a detailed master plan. The site sheet has expanded the information on the master plan and associated expectations.

The Council is working with neighbouring authorities to understand the cumulative impact on the highways network of growth in the local plan to 2036 using the Suffolk County Transport Model, a strategic highway model. Through the work, the Council is developing a programme of mitigation. The site is sustainably located close to public transport and jobs and facilities.

The need to take account of the River Corridor Buffer (10m from the river) has now been identified on the site sheet.

The need to enable greater recreational, leisure and sports use of the River has been stated on the site sheet.

The footpaths and safeguarded minerals facility (within 250m) have been earmarked on the site sheet for reference.

In addition, the site sheet also refers to the need for a contaminated land assessment.

112. Opportunity Areas B – Merchant Quarter

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25983	Suffolk County Council	Ancillary routes should acknowledge historic routes and features as appropriate (in order to aid public understanding and appreciation of heritage).

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25834	Cardinal Lofts (Mill) Ltd	The Company controls three of the most important sites (IP035, IP206 and IP211) in the Merchants Quarter and is concerned that the Development Options plan, together with the Development Principles will render development unviable and frustrate proposals to bring forward sites. Whilst the Company does not take issue with the objectives for the Merchants Quarter, it is of the view that: <ul style="list-style-type: none"> - North-South linkages through IP035 are wrongly located; - Proposed for a new 'urban focal space' on IP035 are oversized and over ambitious; and - IP035 is capable of accommodating greater than five storeys without adversely impacting heritage assets.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

This is an important Waterfront area which has been planned through site analysis to ensure that urban design issues are taken into account in the overall development area to ensure a continuity throughout. The opportunity area incorporates a number of allocated sites. Principally IP035, IP206 and IP211, IP043; IP011; IP054 and any potential developer in this area should also consult these site sheets in order to gain knowledge of site constraints and requirements.

Where necessary, utilities infrastructure is referred to. No change.

113. Opportunity Areas C – Mint Quarter/ Cox Lane regeneration area and surrounding area

Representations	Comments	Object	Support
3	1	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25580	Theatres Trust	We are supportive of the objectives set out for this area, in particular improvements around Major's Corner which would enhance the environment around the Regent.
25982	Suffolk County Council	The reference to the scheduled monuments in the Development Principles section could be extended to say 'Development to address Scheduled Monuments and archaeology, including conservation principles and, where relevant, mitigation for impacts on archaeological remains and enhancement of public understanding'.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25895	Private individual	The owners of Bond Street Garage and the car park behind to the rear of 67 Upper Orwell Street would like you to consider the development potential of this area in relation to the Mint Quarter.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

The development principles have been amended in response to the suggestion made by the Archaeology Team at Suffolk County Council. This revised wording provides greater clarity for developers on the archaeological considerations of the site.

Officers have been in discussion with the owners following their submission promoting the Bond Street Garage and car park to the rear. However, whilst officers are broadly supportive of the principle of development, as the site is less than 0.1ha and is unlikely

to be able to accommodate a capacity of 10 or more dwellings, it does not meet the threshold for including as a specific allocation in the IP-One area.

114. Opportunity Areas E – Westgate

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25581	Theatres Trust	Again, we are supportive of improvements to the public realm and environment around New Wolsey Theatre. We would encourage engagement with the Trust on such proposals.
25984	Suffolk County Council	Ancillary routes should acknowledge historic routes and features as appropriate (in order to aid public understanding and appreciation of heritage).

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

An additional development principle has been included as requested by the Suffolk County Council Archaeology Team. This will help to ensure the heritage value of the area is preserved and enhanced.

115. Opportunity Area H – Holywells

Representations	Comments	Object	Support
N/A	0	0	0

How these comments have been taken into account in the Final Draft Local Plan:

This is a new Opportunity Area inserted to cover the cluster of site allocations (IP042, IP045, IP064a, IP098 and IP226) around the Holywells Road area.

116. Chapter 7 – Implementation, Targets, Monitoring and Review

Representations	Comments	Object	Support
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N/A	0	0	0
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No comments were made on this chapter.

How these comments have been taken into account in the Final Draft Local Plan:

No changes.

117. Appendix 1 – A summary of the tests of soundness

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Statutory Consultees

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

No changes

118. Appendix 2 – A list of policies contained in this document

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Statutory Consultees

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

Policy SP4 and Opportunity Area H have been inserted into the list.

119. Appendix 3 – Site Allocation Details

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25711	Anglian Water	Consider there is a need distinguish policy requirements relevant to Anglian Water's existing infrastructure as set out in existing text and clarify the status of Appendix 3 for decision making.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The site sheets provided in Appendix 3A is for information only; land allocations are made through the policies in the plan. This is explained in Appendix 3.

Documents for Download

1. Documents for Download

Representations	Comments	Object	Support
27	0	25	2

2. Strategic Environmental Assessment and Sustainability Appraisal (includes Non-Technical Summary)

Representations	Comments	Object	Support
11		10	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25770	Natural England	Satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive and guidance. Advise that further updates to the SA should ensure a robust assessment of the environmental effects of plan policies and allocations on statutorily designated sites and landscapes including the Orwell Estuary SPA, SSSIs and the Suffolk Coast and Heaths AONB, considering our advice and the findings of the evolving HRA. The SA will need to identify appropriate mitigation to address any adverse impacts to designated sites and landscapes and other aspects of the natural environment.
25760	Natural England	The effects on local roads and the impacts on vulnerable sites from air quality effects on the wider road network should be assessed using traffic projections and the 200m distance criterion. The designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants. The results of the assessment should inform updates to the SA, which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25877	Save our Country Spaces	<p>It is too early to comment on the SA report for the following reasons.</p> <ol style="list-style-type: none"> 1. No SA of IBCs decision not to comply with air quality guidance. 2. No SA of IBC's non-adherence to government guidance for AQAP and lack of target to reduce air pollution. 3. No traffic modelling without TUOC for the IGS development 4. No sewage infrastructure plan/ proposals. 5. No air quality modelling/ assessment 6. No air quality or noise assessment on rail. <p>Lack of appraisal of the impacts of building on land at Humber Doucy Lane Updated SA is required to consider these issues.</p>
25871	Save our Country Spaces	<p>The SA is unsound as it doesn't utilise the best available baseline and modelling data housing projections nor the ONS migration data, which significantly lower the objectively assessed housing need.</p> <p>The earlier SA highlights the lack of information and uncertainty in assessing the effects on traffic, air quality and climate change of circa 4000 homes to be built and exposes a hole.</p> <p>The plan fails to demonstrate that IBC can secure the required compliance.</p> <p>The SA fails to take adequate account of issues including the viability of the IGS due to the severe impact on traffic and limited sewage infrastructure.</p>
25870	Save our Country Spaces	<p>The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.</p>
25863	Save our Country Spaces	<p>The SEA Directive requires that the assessment include identification of</p>

		cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.
25862	Save our Country Spaces	<p>The SA is unsound as it doesn't utilise the best available baseline and modelling data housing projections nor the ONS migration data, which significantly lower the objectively assessed housing need.</p> <p>The earlier SA highlights the lack of information and uncertainty in assessing the effects on traffic, air quality and climate change of circa 4000 homes to be built and exposes a hole.</p> <p>The plan fails to demonstrate that IBC can secure the required compliance.</p> <p>The SA fails to take adequate account of issues including the viability of the IGS due to the severe impact on traffic and limited sewage infrastructure.</p>
25839	Ravenswood Environmental Group	<p>The traffic-light scoring system used is inaccurate insofar as it relates to various sites within Ravenswood. The SA is also not consistent with the SHEELAA which again uses a traffic-light scoring system and incorrectly scores sites which are known to have negative issues. The SA results of each of the sites pertaining to the Ravenswood locality are questioned (IP150a, IP150b, IP150c (omitted), IP150d, IP150e and IP152).</p> <p>The SA does not assess sites cumulatively. These sites cumulatively have a negative impact on the SPA and visitor pressure is already too great and associated management too poor to allow further development here.</p>
25684	Northern Fringe Protection Group	<p>Too early to comment on the SA due to:</p> <ul style="list-style-type: none"> - No assessment of the proposed non-adherence to Government Guidelines for housing assessment and the alternative strategy; - No SA of IBCs decision not to comply with air quality guidance; - No SA of IBC's no adherence to government guidelines for AQAP and lack of target; - No sewage infrastructure plan/ proposals and

		<p>no impact assessment;</p> <ul style="list-style-type: none"> - No air quality modelling/ assessment of road and rail transport; - No noise assessment of rail; - No Sizewell C impact assessment; - Review of Ipswich Retail;and - Lack of appraisal of Humber Doucy Lane
25666	Northern Fringe Protection Group	<p>The Sustainability Assessment is incomplete and underplays many key issues. It needs to fully assess air quality impacts, the impacts of the additional road infrastructure required to prevent junctions reaching capacity and the impacts of the new sewage infrastructure that will be required to deliver the Core Strategy. It needs to consider the adoption of Governments guideline target of 445 dwellings per annum as an option.</p> <p>The SA needs to fully assess the implications of building on the Humber Doucy Lane site and whether delivering more homes in the Town Centre instead of retail might be more sustainable.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26116	Private individual	<p>Fails take adequate account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of the 'Garden Suburb', in combination with other cross-boundary proposals, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure. The plans are unsound and do not comply with the NPPF.</p> <p>The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10. Appears that environmental, social and economic effects of the plan(s) are inadequately/ inaccurately assessed against HRA and the SAs "Serious adverse effects" have not been properly identified.</p>

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners

How these comments have been taken into account in the Final Draft Local Plan:

The Sustainability Appraisal has been amended significantly as part of the Final Draft Local Plan which will address these comments in part. Overall though the Council considers that the process has been carried out in accordance with the relevant legislation.

Both a Health Impact Assessment and a Habitats Regulations Assessment have been undertaken. These are separate to the SA.

A local centre has not been incorporated into ISPA4. It is considered that with the improvements to the sustainable transport modes likely from any development that the nearby IGS district centre and other local centres will provide sufficient amenities for future occupiers.

The SA, at a strategic level, has assessed every option, policy and site allocation in the Plan for its likely impacts on air quality.

New infrastructure proposed in the Plan, such as new roads, have also been assessed for their likely sustainability performance – including impacts on air quality. Where new roads are proposed the SA recognises that this could help to alleviate congestion in some locations, thereby reducing the number and frequency of idle cars, but it could also potentially lead to a net increase in road traffic with subsequent impacts on air quality. See the assessment of Policy CS10 in Appendix D as an example.

Separate to the SA, the Council have carried out detailed transport and air quality assessments (see response to Policy DM3). Results in the SA are consistent with the results of these assessments.

The Government Guideline target of 445 dwellings per annum has been assessed as an option. See the assessment of Alternative Scenario D in Appendix C of the SA.

Option 3 (re-use of existing land/ uses) has been considered but was not selected as option 1 was deemed more appropriate. There are a limited number of town centre retail sites which by their nature need to be located in the town centre to meet other objectives of the plan.

Each option, policy and site allocation has been assessed for their potential impacts on air quality (i.e. SA Objective 7- To maintain and where possible improve air quality).

During the assessments of options, policies and sites against SA Objective 4 (To improve the quality of where people live and work), the potential risk of people being exposed to disturbances such as noise pollution (including rail) has been considered.

Sizewell C is approximately 35km north east of Ipswich and is considered to be outside the area of search for relevant plans and programmes that could have a cumulative impact with the Ipswich Plan.

In SA and SEA it is necessary to carry out assessments based on the best available information. This has been done in each case. However, the SA plays no role in calculating housing numbers or the OAN. The SA is intended to predict and evaluate the sustainability impacts of the different housing options that are identified by the Council.

A range of different housing options have been assessed in Appendix E. The sustainability information for each one has helped to inform the Council's decision making with regards to the quantity of development to pursue in the Plan.

The SEA Directive necessitates that the Environmental Report highlights where there is uncertainty in the assessment. Chapter 3 of the SA, which explains the methodology of the assessments in the SA, therefore indicates how and why there are uncertainties in some of the assessments. Each assessment of policies and sites in the appendices explicitly states whether there is considered to be a high, medium or low degree of uncertainty behind the assessment.

Uncertainties are an inherent part of assessments in a Plan's SA, in part due to the length of time over which the Plan will be in place and the potential for unforeseen circumstances to arise. Assessments in the SA therefore adopt a precautionary approach (i.e. in the face of uncertainty, what's the worst case scenario?) and in Chapter 4 proposes a monitoring framework which would help to ensure that the effects predicted and evaluated in the SA do arise and that any avoidance or mitigation measures adopted by the Council are as effective as planned.

The SA/SEA considers the impacts of each policy and site in the Plan on sustainable transport in Ipswich. The Garden Suburb, through the assessment of Policy CS10, has been assessed at a high and strategic level for its impact on the objective of encouraging efficient patterns of movement, promoting sustainable travel of transport and ensuring good access to services.

Policies in the Plan commit the Council to ensuring that necessary infrastructure would be in place, and have appropriate capacity to accommodate new development, prior to new development taking place.

It should also be noted that viability is not an issue tackled in SA.

All options have been assessed for their likely impacts on air pollution as well as designated sites. The SA has also carried out a cumulative effects assessment of the Plan and ruled out significant effects on a European designated site as well as air quality on the whole.

Assessments against the transport objective generally found that the Plan would be likely to enhance the sustainability of transport in Ipswich, following improvements to public and active transport options.

It is considered that the only road that could feasibility impact the SPA through nitrogen deposition would be Orwell Bridge A14. The Council have carried out detailed air quality and transport modelling and assessments separate to the SA which have been better placed to determine the impacts of the Plan on traffic on the A14. In line with the transport assessment, should the proposed mitigation measures be adopted then the A14 would be able to cater for the anticipated increases in traffic. As per the HRA, significant effects on the SPA would not arise.

It should also be noted that the only site allocation within the Plan that is within 200m of the SPA is the proposed country park extension at Pond Hall Carr and Farm. It is likely to prove beneficial to the SPA that this land has been designated as a country park extension.

APIS was used to determine the critical loads for the Stour and Orwell Estuaries SPA. Given the lack of impacts on the SPA, no mitigation measures have been considered to be necessary through the SA/SEA.

In the case of determining whether the Plan would lead to a significant effect on a European designation, the SEA has acted in conformity with the findings and recommendations of the HRA process.

The SA has considered the potential impacts of all options considered during the preparation of the Plan on statutorily designated sites, as well as protected species and habitats and also overall ecological connectivity. Where impacts have been identified, appropriate measures have been recommended.

The SA/SEA provides a cumulative assessment of all options in the Plan in Chapter 3 of the main report.

This assessment is in conformity with the outcomes of the HRA, which provides a detailed assessment of the Plan (including cumulatively) on European designations (i.e. the SPA).

Transport, air quality and economy each have their own dedicated SA Objective in the SA Framework, against which all options, policies and sites have been assessed. It should be borne in mind that the SA operates at a high and strategic level and is not capable to carrying out detailed transport modelling exercises. Detailed transport and air quality assessments have been carried out separate to the SA. The assessment results in the SA, whilst operating at a more strategic level, are consistent with the results of the more detailed assessments commissioned by the Council.

The Plan commits to ensuring that appropriate infrastructure, including for sewage, is in place with the necessary level of capacity, prior to development proceeding.

Each option, policy and site has been assessed for its likely impact on the causes of climate change (i.e. carbon emissions) as well as its impact on the vulnerability of local receptors to the impacts of climate change (e.g. flood risk).

Recommendations have been made in each case for reducing the carbon footprint of proposals, such as ensuring good sustainable transport options and energy efficient buildings.

The location of sites allocated by the Council conforms with national planning law on flood risk.

3. SEA and Sustainability Appendices A – E

Representations	Comments	Object	Support
3	0	3	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25852	Ravenswood Environmental Group	IP150d+e: No justification for reverting from employment to housing. Traffic impact not assessed. Nothing to rule out piecemeal applications. It is visually and ecologically connected to the adjacent nature reserve. Density is higher than surroundings. Existing green infrastructure should be preserved. Need for green infrastructure will increase density. Vagueness about how it will come forward. Without a comprehensive and cumulative assessment of all proposals in this area the piecemeal developments would exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality. A comprehensive proposal must be subject to EIA. Referred to as brownfield but clearly greenfield.
25848	Ravenswood Environmental Group	IP150C – The Land Adjacent to Nacton Road does not appear in the SA and the site sheet for site IP150e suggests that this site should be master planned with IP150c but there is no policy to insist upon it. There should be a criteria-based policy stating how the site can be delivered as part of a masterplan.

25840	Ravenswood Environmental Group	The traffic-light scoring system used is inaccurate insofar as it relates to various sites within Ravenswood. The SA is also not consistent with the SHEELAA which again uses a traffic-light scoring system and incorrectly scores sites which are known to have negative issues. The SA results of each of the sites pertaining to the Ravenswood locality are questioned (IP150a, IP150b, IP150c (omitted), IP150d, IP150e and IP152). The SA does not assess sites cumulatively. These sites cumulatively have a negative impact on the SPA and visitor pressure is already too great and associated management too poor to allow further development here.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The colour coded assessment approach applied to potential site allocations in Ravenswood is consistent with the approach used for all sites. The criteria used in the SHEELAA is different from that used in the SA. Typically, the colour coded system in the SA is intended to only be an indication of the assessment in order to allow rapid comparisons between sites. However, the assessment text should be referred to in order to understand how and why each colour was arrived at. It should be noted that the assessments of sites in Ravenswood has identified a mixture of both positive and negative potential sustainability impacts.

The assessment approach applied to each site was established during the SA Scoping stage, which was consulted on with statutory bodies, the general public and other stakeholders and subsequently amended in line with the responses received.

The assessment of site IP150c is now included in Appendix E.

4. Habitats Regulation Assessment

Representations	Comments	Object	Support
7	0	6	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25761	Natural England	<p>The effects on local roads and the impacts on vulnerable sites from air quality effects on the wider road network should be assessed using traffic projections and the 200m distance criterion. The designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.</p> <p>APIS provides a searchable database and information on pollutants. The results of the assessment should inform updates to the SA, which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment.</p>
25742	Natural England	<p>Satisfied that the HRA has provided a robust assessment of the Preferred Options. Natural England agrees that it is currently too early for the HRA to provide a conclusion that the plan will not lead to any adverse effects on European sites; however, we note that the screening of the Preferred Options has not identified any issues that flag a major concern that would significantly alter the direction and quantum of growth for the Borough. Welcomes recommendations for strengthening of policy wording and identification of key themes, including recreation, urbanisation, water and air quality, for detailed assessment through further stages.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25667	Northern Fringe Protection Group	<p>The Habitats Assessment also needs to include the impacts of the additional road infrastructure required to prevent junctions reaching capacity and the impacts of the new sewage infrastructure that will be required to deliver the Core Strategy.</p>

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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26084	Mersea Homes Limited	The HRA which supports the Regulation 18 Local Plan consultation fails to offer clarity about the role of the Ipswich Garden Suburb Country Park within the RAMS regime, neither does it justify the exclusion of IGS sites from assessment under RAMS. The compartmentalisation of the IGS Country Park and RAMS should be justified if it is to be maintained, notwithstanding our view that the two means of mitigation should be integrated under a single approach, allied to the provisions of ISPA3.
26076	CBRE	The HRA which supports the Regulation 18 Local Plan consultation fails to offer clarity about the role of the Ipswich Garden Suburb Country Park within the RAMS regime, neither does it justify the exclusion of IGS sites from assessment under RAMS. The compartmentalisation of the IGS Country Park and RAMS should be justified if it is to be maintained, notwithstanding our view that the two means of mitigation should be integrated under a single approach, allied to the provisions of ISPA3.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26117	Private individual	Fails take adequate account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of the 'Garden Suburb', in combination with other cross-boundary proposals, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure. The plans are unsound and do not comply with the NPPF. The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10. Appears that environmental, social and economic effects of the plan(s) are inadequately/ inaccurately assessed against HRA and the SAs "Serious adverse effects" have not been properly identified.

The following made no comments in response to this issue.

Parish and Town Councils

How these comments have been taken into account in the Final Draft Local Plan:

The Council considers that the Habitat Regulations Assessment has been carried out in accordance with the relevant legislation.

5. Draft Strategic Housing & Economic Availability Assessment (SHELAA)

Representations	Comments	Object	Support
4	3	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26098	Salter and Skinner Partnership	<p>Development (113 dwellings) at Bourne End Nursery (IP034) is appropriate on brownfield site. Supports the government objective to boost housing on previously developed sites. Council does not have 5 year housing land supply.</p> <p>Sites in flood zone 2 can be developed for housing if there are no sequentially preferable sites, subject to exception test. There aren't other suitable sites to ensure the Borough has a suitable range of sites.</p> <p>The development can be made safe for its lifetime. Only minor shortcoming is partial-flooding of road but not dangerous enough for refusal.</p> <p>Allocate site for housing. (see appendix accompanying reports)</p>
25969	Boyer on behalf of Austin Street Projects Ltd	<p>The land at 68a Austin Street is vacant and secure. There is an intention to redevelop the site to deliver a high-quality residential development, comprising predominantly of affordable housing.</p> <p>The site was submitted to the 2017 'Call for Sites' and it has been assessed within the draft SHELAA as being suitable, available (immediately) and achievable (within 5 years) for residential development (SHELAA Ref. IP309).</p> <p>Given the positive assessment through pre-application discussions, as well as through the draft SHELAA, the land at 68a Austin Street should be included as an allocation for</p>

		residential development within the emerging Local Plan.
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25896	Private individual	The owners of Bond Street Garage and the car park behind to the rear of 67 Upper Orwell Street would like you to consider the development potential of this area in relation to the Mint Quarter.
25587	Private individual	Suggest that land accessible between 67-71 Upper Orwell Street IP4 1HP, which reaches from the rear of 65 to 75 Upper Orwell Street, and could include the premises at 42 Bond Street, is considered as a potential site. It would easily be able to accommodate at least 5 homes.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

How these comments have been taken into account in the Final Draft Local Plan:

The 67 Upper Orwell Street site falls below the 0.1ha/ 10 dwelling threshold for allocation and has therefore not been included.

68A Austin Street has been included as an allocation.

The Bourne End Nurseries site is being assessed in terms of flood safety as part of the updated Strategic Flood Risk Assessment.

6. Plan 1 – District and Local Centres

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

How these comments have been taken into account in the Final Draft Local Plan:

No comments were made. The Grimwade Street Local Centre has been deleted from the map because there are plans to redevelop the parade of shops in the long-term

and the Local Centre is to be removed as it no longer serves its original purpose in this location.

The proposed Sproughton Road District Centre has been shown on the map to reflect the granting of the permission 18/00948/OUTFL for commercial and retail uses on Boss Hall Road.

7. Plan 2 – Flood Risk

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25013	Suffolk County Council	It would be helpful if this plan of nationally designated flood zones could highlight the fact that this relates to fluvial flooding, and that further information on surface water (pluvial) flooding can be found in the Strategic Flood Risk Assessment (SFRA).

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Plan has been amended accordingly.

8. Plan 3 – Conservation Areas

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

How these comments have been taken into account in the Final Draft Local Plan:

No change.

9. Plan 4 – Archaeological Importance

Representations	Comments	Object	Support
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1	0	1	0
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Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25980	Suffolk County Council	The development of this Plan offers an opportunity to amend the AAI, in line with the Urban Archaeology Database Project (UAD) and assessment of Character Zones undertaken for the Supplementary Planning Document. The existing AAI was used to inform these zones, as was information in the UAD, and it may be most useful, clear to a developer and complementary to the SPD if the AAI reflects the core 'Zone 1' areas (see page 63 of the SPD). The County Council would be happy to discuss this point, with the Council and Historic England, and to provide any evidence.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

How these comments have been taken into account in the Final Draft Local Plan:

The Borough Council is considering this point and will engage with the County Council further on this as appropriate.

10. Plan 5 – Ipswich Ecological Network

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

How these comments have been taken into account in the Final Draft Local Plan:

No change

11. Plan 6 – Green Corridors

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

How these comments have been taken into account in the Final Draft Local Plan:

No change

Appendix 3 – Regulation 19 Consultation details

Who was consulted

As for the earlier Issues and Options and Preferred options consultations the following organisations and individuals were consulted.

Specific, Statutory and general consultation bodies (by post)
Anglian Water Group (AWG Property Ltd)
British Gas (Lakeside)
BT Group plc
Copleston High School
DB Cargo Limited
Department for Transport (DFT)
EON UK Plc
Essex & Suffolk Water
Handford Hall Primary School
Headway Ipswich and East Suffolk
Health & Safety Executive (East Anglia) HSE local offices
Holywells High School
Hutchison 3G UK Ltd
Ipswich Academy (formerly Hollywells High School)
Ipswich School
Ipswich Disabled Advice Bureau
Lambert Smith Hampton on behalf of NOMS/HM Prison Service
Murrayfield Primary School
Newcastle City Council
NPOWER
NTL UK
One-Ipswich
Opal Telecom
Orange Business Services
Orchard Street Health Centre
Public Health England - Midlands and east of England Regional Office
Smartest Energy
St Alban's Catholic High School
St John Ambulance
St Joseph's College
One Suffolk Sixth Form College
T-Mobile (UK) Ltd
Torch Communications Ltd
Vectone Services Ltd
Vodafone Limited
Witnesham Parochial Church Council

Specific, Statutory and general consultation bodies (by email)
Akenham Parish Council
Anglia Care Trust
Anglian Water
Babergh Mid Suffolk District Councils
Barnham Parish Council
Belstead Parish Council
Bramford Parish Council
Brightwell, Foxhall & Purdis Farm Parish Council
Broke Hall Community Primary School
BS Pension Fund Trustee Ltd
Cable and Wireless
Castle Hill Infant and Junior School
Chantry Academy
Claydon & Whitton Parish Council
Coal Authority
Colchester Hospital University NHS
Community Action Suffolk
Copdock & Washbrook Parish Council
Copleston High School
CTIL (on behalf of Vodafone and Telefónica)
Cycle Ipswich
Cycling UK
Dale Hall Community Primary School
Department for Communities and Local Government
Department for Education
East Anglian Wire Works
East of England LGA
Easton and Otley College
EDF Energy
EE
Environment Agency
Felistowe Town Council
Felixstowe Coastal
Friston Parish Council
Great Bealings Parish Council
Great Yarmouth Borough Council
Halifax Primary School
Henley Parish Council
Highways England (Agency)
Hillside Primary and Nursery School
Historic England
Home Office

Homes England
Homes and Communities Agency (Formerly Homes England)
House of Commons
Hoxne and Eye
Iceni Projects Limited
Inland Waterways Association
Ipserve
Ipswich and Suffolk Council for Racial Equality
Ipswich Borough Council Councillors
Ipswich Borough Council Internal Departments
Ipswich Chamber of Commerce
Ipswich High School for Girls (Junior and Senior)
Ipswich Hospital NHS Trust
Ipswich Preparatory School
Ipswich School
Ipswich Wildlife Group
NHS England Midlands and East (East)
NHS Ipswich & East Suffolk Clinical Commissioning Group
Ipswich & East Suffolk CCG & West Suffolk CCG
Little Bealings Parish Council
Marine Management Organisation
MBNL (EE and Three)
Member of Parliament
MS Society - Ipswich
MLL Telecom Ltd
Morland Primary School
Nacton Parish Council
Natural England
Network Rail
NHS Property Services Ltd
Norfolk and Suffolk NHS Foundation Trust
Northgate High School
Office of Nuclear Regulation
Office of Rail and Road
Ormiston Endeavour Academy
Otley College of Agriculture and Horticulture
Parish Council Playford Village
Pinewood Parish Council
Police and Crime Commissioner for Suffolk
Railfuture
Ranelagh Primary School
Ravenswood Community Primary School
Rosehill Primary School
Rushmere Hall Primary School
Rushmere St Andrew Parish Council

Shopmobility
Sports England (East)
Springfield Infant School and Nursery
Springfield Junior School
Sprites Primary School
Sproughton Parish Council
St Alban's Catholic High School
West Suffolk/ Forest Heath District Council and St Edmundsbury Borough Council
St Helen's Primary School
St John's C of E Primary School
St Margaret's Primary School
St Mark's Catholic Primary School
St Matthew's C of E Primary School
St Pancras Catholic Primary School
Stoke High School
Suffolk Association of Local Councils
Suffolk Biodiversity Information Service
Suffolk Coastal and Waveney District Councils (East Suffolk)
Suffolk Coastal District Council (East Suffolk)
Suffolk Constabulary
Suffolk County Council Councillors
Suffolk County Council Internal Departments
Suffolk Fire and Rescue Service (Suffolk County Council)
Suffolk GP Federation - Woodbridge
Suffolk Mind
Suffolk New College
Swilland and Winesham grouped Parish Council
The Northgate Foundation
The Oaks Community Primary School
The Planning Inspectorate
Theatres Trust
The Willows Primary School
Thomas Wolsey School
Three
Tuddenham St Martin Parish Council
UK Power Networks
University of Suffolk (UCS Campus)
Vodafone and O2
West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council)
Westbourne Academy
Westerfield Parish Council
Wherstead Parish Council
Whitehouse Community Primary School
Whitton Community Primary School
Wild Anglia Local Nature Partnership/New Anglia Local Enterprise Partnership

Willow Park Montessori Day Nursery
Wood Plc on behalf of National Grid
Individuals and organisations
Includes individuals, planning and estate agents, developers, land owners, schools, local businesses and others on the Ipswich Local Plan mail list.

How they were consulted

Public Exhibitions and Events

Venue	Date	Time
Ipswich Town Hall, Pickwick Room	Saturday 8 th February 2020	10am – 5pm
Ipswich Town Hall, Pickwick Room	Friday 7 th February 2020	1pm – 7pm
Central Area Committee Christ Church – Langston Hall	Wednesday 15 th January 2020	7pm – 9pm
South West Area Committee Grafton House, Gipping Room	Thursday 16 th January 2020	6:30 – 8:30pm
South East Event (in lieu of cancelled South East Area Committee) Cliff Lane Primary School	Tuesday 21 st January 2020	5pm – 7pm
North West Area Committee (outside consultation period) Castle Hill Community Centre	Thursday 9 th January 2020	7pm – 9pm
North West Event (within consultation period) Castle Hill Community Centre	Monday 3 rd February 2020	5pm – 7pm
North East Area Committee Ransomes Sports Pavilion, Sidegate Avenue	Thursday 23 rd January 2020	7:30 – 9:30pm

Consultation documents and materials online and at exhibitions

Documents	Details
Core Strategy and Policies DPD Review Preferred Options (November 2018) + Tracked Change version	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Plan 1 (District and Local Centres), Plan 2 (Flood Risk), Plan 3 (Conservation Areas), Plan 4 (Area of Archaeological Importance including Scheduled Ancient Monuments), Plan 5 (Ipswich Ecological Network) and Plan 6 (Green Corridors) (November 2018)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House

Site Sheets (IP003 – IP348)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review Preferred Options (November 2018) + Tracked Change version	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Local Plan Policies Map (November 2018) Local Plan Policies Map IP-One Area Inset (November 2018)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Strategic Environment Assessment and Sustainability Appraisal (includes Non-Technical Summary) and Appendices A -E (January 2019)	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Habitats Regulations Assessment of the Ipswich Borough Local Plan at Preferred Options Stage (January 2019)	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Notices	Notices placed on the vicinity of every proposed site allocation
Draft Statement of Common Ground with the Ipswich Strategic Planning Area Authorities (November 2018) Issues and Options Consultation Statement (November 2018) Equality Impact Assessment Statement of Compliance with the Duty to Co-Operate	Evidence-based documents available for download online
Ipswich Garden Suburb (IGS) Housing Retail & Town Centre Air Quality, Transport & Green Infrastructure Economy	Topic Papers available for download online
Draft Strategic Housing & Economic Land Availability Assessment (SHELAA) and Site Map	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
GIS Online Service	Interactive mapping service available
Consultation Module Site	Interactive consultation system that enables those to register and comment online
Comments Form	PDF and word versions online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House

Letters/emails	Sent to contacts on the local plan mail list (including private individuals and statutory consultees) informing of consultation dates of exhibitions
Presentations at the Area Committees	Planning officers gave a talk outlining (on A1 boards) the main issues and facts in the Core Strategy and Site Allocations documents of the Local Plan
A4 Preferred Options “What is a Local Plan” leaflet	Available to take away at exhibitions
Ipswich Borough Council Social Media feeds	Regular notifications and opportunity to interact on Facebook and Twitter

Media and Publicity

The Council advertised the Final Draft consultation in the Ipswich Star and East Anglian Daily Times local press on Wednesday 15th January and Friday 24th January 2020. Ipswich Borough Council hosted a dedicated web page from January to March that included downloadable comment forms. Those on the Ipswich Local Plan Mailing List were notified via letter and email and invited to make comments on the Preferred Options documents. Representations could also be submitted electronically on the consultation module site within the consultation period.

Twitter and Facebook pages ran for the duration of the consultation with regular bulletins on exhibition information and venue dates.

Appendix 4 – Issues and Options – Advertisements

Ipswich Star | Friday, September 15, 2017 15

News

Have your say on how Ipswich will grow over the next two decades

People from Ipswich and across east Suffolk can have their say on how the town should develop over the next 20 years later this month.

The number of homes in the town is expected to increase by more than 11,000 between 2014 and 2036 as the population of Ipswich increases by more than 13,000.

Now a new Local Plan for Ipswich is being prepared alongside a new Local Plan for Suffolk Coastal – which envisages major growth in the greater Ipswich area, in places like Kesgrave, Rushmere and the Felstead peninsula.

As an early stage in preparing the plan, residents and people who use Ipswich as a regional centre have the chance to comment on the proposals until the end of next month.

PAUL GRATER
paul.grater@ipswich.gov.uk

Exhibitions explaining the issues will be held in the Pickwick Room at the Town Hall between 11am and 5pm on Saturday, September 30 and Tuesday, October 3.

The Local Plan includes the new Upper Orwell Crossings which are due to be opened in the early 2020s and the possibility of a northern by-pass, or relief road, as part of the northern fringe development.

Carole Jones, planning and development portfolio-holder, said: "This is really important for our town and the people who live and work here. We are looking at finding room for 11,400 homes and creating 19,000 jobs. It is also important that the public have their say – planning policy is not dull, it's vital!"

The consultation documents are on the council's website www.ipswich.gov.uk/currentconsultations, at the Customer Services Centre in the Town Hall, Ipswich libraries and at the council's offices at Grafton House, Russell Road.

Planning officers will also be available to answer questions at the Ipswich Area Committee meetings during September – details can be found at www.ipswich.gov.uk/content/area-committees-explained. Comments must be returned to the council by 11.45pm on Monday, October 30.

The Local Plan process will then be discussed again by the borough council and examined in full before it is finally adopted.

Suffolk Coastal is going through a similar process at the same time so issues to the east of the town centre can be considered together – especially controversial plans for a new town at Martlesham Heath.



An aerial view of Ipswich. Picture: MIKE PAGE

2004 (Regulation 12) Notice of Public Consultation on Issues and Options for the Ipswich Local Plan Review and the Sustainability Appraisal Scoping Report

Ipswich Borough Council hereby gives notice of public consultation on issues and options for the Ipswich Local Plan Review and the Sustainability Appraisal Scoping Report. The Local Plan for Ipswich covering the period to 2031 was adopted in February 2017. However, the Council is required to undertake a review of the objectively-assessed needs for new housing, employment land and new retail floorspace set out in the Plan, in partnership with neighbouring authorities. The review is also an opportunity to seek views on other land use issues affecting Ipswich. The Local Plan Review will look ahead to 2036.

What is a Local Plan?
A Local Plan determines the amount of future development needed in the Borough for land uses such as housing, offices, industry and retail. It allocates sites for new development, identifies areas where development should be restricted and includes policies which are used for determining planning applications.

Public Consultation
The consultation will run for ten weeks starting on Friday 18th August 2017 and ending at 11.45pm on Monday 30th October 2017. The Council is seeking views on two documents:

- Issues and Options for the Ipswich Local Plan Review. This document is in two parts:
 - Part 1, which has been prepared jointly with Suffolk Coastal District Council in order to consider strategic, cross-boundary issues; and
 - Part 2, which addresses local issues for Ipswich Borough; and
- A Sustainability Appraisal Scoping Report, which will form the basis for sustainability appraisal of the new Local Plan Review documents as they are prepared over coming months.

Inspection of documents
The documents listed above are available for inspection on the Council's website (www.ipswich.gov.uk/consultations) and at the following locations:

- The Customer Services Centre, Teentank, Cornhill, Ipswich (weekdays 8.30am to 5.00pm).
- The Ipswich County Library, Northgate Street, Ipswich (Mon. Weds, Thurs 9.00am to 4.00pm; Fri 9.00am to 2.00pm; Sat 8.30am to 5.00pm and Sun 10.00am to 4.00pm).
- Branch libraries across Ipswich (Chantry, Gainsborough, Broom Hill open Mon-Sun various opening hours; Rosethill, Stoke, open Tues-Sun various opening hours).
- Grafton House Reception, 15-17 Russell Road, Ipswich (Mon-Fri 8.30am to 5.00pm).

Copies of the consultation documents will be available for free on Compact Disc, subject to availability, from the exhibitions or at Grafton House by request. Paper copies will be available at cost of printing plus P&P.

How to comment
You are invited to submit your comments electronically using the Council's online consultation module (<http://ipswich.xd-cons.all.net/localplan/>), or by email to planningpolicy@ipswich.gov.uk using the comments form provided on the Council's web site. Copies of the comments form are available to download, complete and email back, or to print and return by post to the address below. Paper copies of the comments form will be available at the venues listed above. Please make it clear whether your comments relate to the Local Plan Review Issues and Options or the Sustainability Appraisal Scoping Report and ensure they are returned to the Council by 11.45pm on Monday 30th October 2017. Please note that comments cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

Consultation Events
Officers will be available to answer questions at the Ipswich Area Committee meetings scheduled between 6th and 21st September 2017 – please see the Council's website for details of dates and venues www.ipswich.gov.uk/recommittees. "Drop-in" exhibitions will also be held as follows at Ipswich Town Hall in the Pickwick Room:
Monday 30th September 2017, 11am – 3pm, and
Tuesday 3rd October 2017, 11am – 3pm.
Date of notice: 18th August 2017

e-mail: planningpolicy@ipswich.gov.uk
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road, Ipswich IP1 2DE
www.ipswich.gov.uk

IPSWICH
BOROUGH COUNCIL

Department of Business, Energy and Industrial Strategy

EAST ANGLIA THREE OFFSHORE WIND FARM

THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2009

NOTICE OF A DECISION ON AN APPLICATION FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR EIA DEVELOPMENT

The Secretary of State for Business, Energy and Industrial Strategy ("the Secretary of State") gives notice under regulation 23(2)(c) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 that a determination has been made on an application made by East Anglia THREE Limited for development consent under the Planning Act 2008 ("the 2008 Act") for EIA development.

The East Anglia THREE project consists of 172 wind turbine generators each

October's email strapline

Watch
 Favourite

Published: 02/10/2017 Last Updated: 13/10/2017 [Page Analytics](#)

This page should have been reviewed 65 days ago. X

A strapline has been agreed for October.

Please ensure that your email signature is in the corporate style, ending with the strapline:

October:

Help plan the future of Ipswich!
www.ipswich.gov.uk/localplan

Appendix 5 – Issues and Options – Website

IBC web page

The screenshot shows the Ipswich.gov.uk website with a search bar at the top. The main content area is titled 'CLOSED - Public Consultation: Issues and Options for the Ipswich Local Plan Review and the Sustainability Appraisal Scoping Report'. It includes sections for 'What is a Local Plan?', 'What is Sustainability Appraisal?', and 'Public Consultation'. The 'Public Consultation' section states that the consultation ran from Friday 18th August 2017 to Monday 20th October 2017. It lists inspection locations and consultation documents available for review.

Public Consultation on Issues and Options for the Ipswich Local Plan Review and the Sustainability Appraisal Scoping Report

18th August – 30th October 2017

Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulation 18)

Environmental Assessment of Plans and Programmes Regulations 2004 (Regulation 12)

Consultation Comments Form

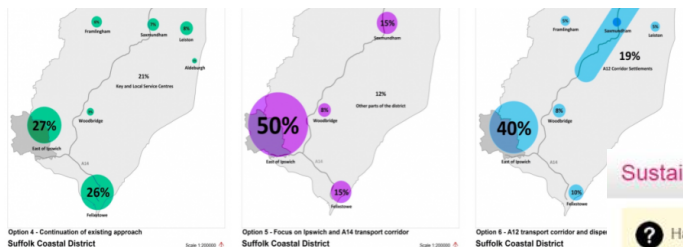


e-mail: planningpolicy@ipswich.gov.uk

Planning Policy Team
 Planning and Development
 Ipswich Borough Council
 Grafton House
 15-17 Russell Road
 Ipswich
 IP1 2DE.

website: www.ipswich.gov.uk

JDI Consultation Module pages



Sustainability Appraisal Scoping Report

Having trouble using the system? Visit our [help page](#) or [contact the council directly](#).

- Q13: Which distribution options do you think would be most appropriate to take forward?
- Q14: Are there any other distribution options that the Councils should consider, including across the whole Area?
- Q15: Should the spatial distribution of jobs growth align with housing growth or should we take a different improving accessibility between homes and work places?
- Q16: Do you have evidence which indicates that building at higher densities in Ipswich and Suffolk Coastal?
- Q17: Should the policy approach of maintaining the physical separation of villages from Ipswich be continued settlements be considered a source of housing land?
- Q18: If development cannot be accommodated within Ipswich, should it be focused within the communities within the larger Ipswich Housing Market Area? What criteria should guide its location?
- Q19: Should Ipswich switch employment land to housing use, even though the Borough has a high jobs target prioritise protecting employment land?
- Q20: Is there other land within Ipswich Borough which should be considered for residential development? space the right one?

Non-Technical Summary

- Chapter 1: Introduction (Ipswich Local Plan Review)
- Chapter 2: Context Review (Task A1)
- Chapter 3: Baseline Characteristics (Task A2)
- Chapter 4: Social Baseline (Task A2)
- Chapter 5: Environmental Baseline (Task A2)
- Chapter 6: Economic Baseline (Task A2)
- Chapter 7: Sustainability Issues and Problems (Task A3)
- Chapter 8: Developing SA Objectives and testing their compatibility (Task A4)
- Chapter 9: Next Steps (A5)
- Appendix I Index of Scoped Documents

Having trouble using the system? Visit our [help page](#) or [contact the council directly](#).

Powered by **opusconsult**

Gypsies, Travellers, Travelling Showpeople and Boat Dwellers

Alongside the Strategic Housing Market Assessment, a Gypsy, Traveller, Travelling Showpeople and Boat Dwellers

Appendix 6 – Issues and Options - Consultation events and exhibition

Ipswich Borough Council Local Plan
 Planning and Compulsory Purchase Act 2004
 Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 18)
 Environmental Assessment of Plans and Programmes (Regulations 2004 (Regulation 12))

Notice of Public Consultation on Issues and Options for the Ipswich Local Plan Review and the Sustainability Appraisal Scoping Report

Ipswich Borough Council hereby give notice of public consultation on issues and options for the Ipswich Local Plan Review and the Sustainability Appraisal Scoping Report. The Local Plan for Ipswich covering the period to 2036 was adopted in February 2017. However, the Council is required to undertake a review of the objectively-assessed needs for new housing, employment land and new retail floorspace set out in the Plan, in partnership with neighbouring authorities. The review is also an opportunity to seek views on other land use issues affecting Ipswich. The Local Plan Review will look ahead to 2036.

What is a Local Plan?
 A Local Plan determines the amount of future development needed in the Borough for land uses such as housing, office, industry and retail. It allocates sites for new development, identifies areas where development should be restricted and includes policies which are used for determining planning applications.

Public Consultation
 The consultation will run for ten weeks starting on Friday 18th August 2017 and ending at 11.45pm on Monday 30th October 2017. The Council is seeking views on two documents:

- Issues and Options for the Ipswich Local Plan Review. This document is in two parts:
 - Part 1, which has been prepared jointly with Suffolk Coastal District Council in order to consider strategic, cross-boundary issues; and
 - Part 2, which addresses local issues for Ipswich Borough; and
- A Sustainability Appraisal Report, which will form the basis for sustainability appraisal of the new Local Plan Review documents as they are prepared over coming months.

Inspection of documents
 The documents listed above are available for inspection on the Council's website www.ipswich.gov.uk/consultation and at the following locations:

- The Customer Services Centre
- The Ipswich County Library
- 6-8 High Street, Ipswich
- Branch libraries across Ipswich (opening hours: Ipswich, South Ipswich, High Street, South Ipswich)
- Ipswich House Reception, 11

Copies of the consultation documents are available from the exhibition or cost of printing plus P&P.

How to comment
 You are invited to submit your comments www.ipswich.gov.uk/consultation using the comments form provided available to download. Paper copies of the comments form are available to download from the exhibition.



Ipswich in 2036?

Help plan the future of Ipswich

Help plan the future of the Borough
 We are preparing a new Local Plan for Ipswich Borough. This is your first opportunity to take part in its preparation.

Issues and Options for the Ipswich Borough Local Plan Review
 Consultation 18th August to 30th October 2017



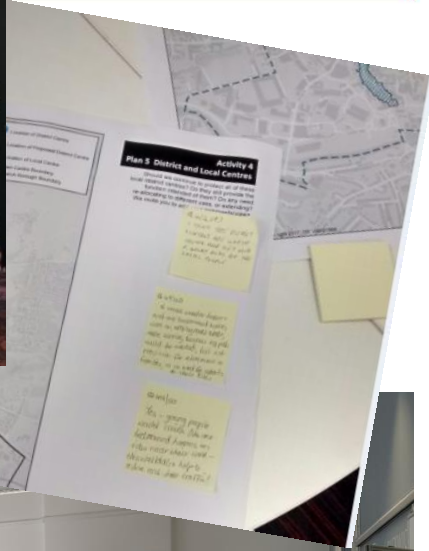
What do you like or dislike about the place where you live?

I like...
 nice plants!!

I dislike...
 Historic discoloured brick
 long narrow roads and old buildings
 Smoking ban in the street
 In no way to be
 Great about
 Ipswich
 Ipswich
 Ipswich
 Ipswich

How do you want your town to be in 2036?

In 2036 I want Ipswich to be...
 Central in areas of work & employment
 A better integrated public transport system



Help plan the future of the Borough
 Issues and Options for the Ipswich Local Plan Review Consultation - 18th August to 30th October 2017

Part 1 - Ipswich Borough
 Part 1 of the Local Plan Review and Options for Ipswich Borough. This document is in two parts: Part 1, which has been prepared jointly with Suffolk Coastal District Council in order to consider strategic, cross-boundary issues; and Part 2, which addresses local issues for Ipswich Borough.

Part 2 - Ipswich Borough
 Part 2 of the Local Plan Review and Options for Ipswich Borough. This document is in two parts: Part 2, which addresses local issues for Ipswich Borough; and Part 3, which addresses local issues for Ipswich Borough.

Part 3 - Ipswich Borough
 Part 3 of the Local Plan Review and Options for Ipswich Borough. This document is in two parts: Part 3, which addresses local issues for Ipswich Borough; and Part 4, which addresses local issues for Ipswich Borough.

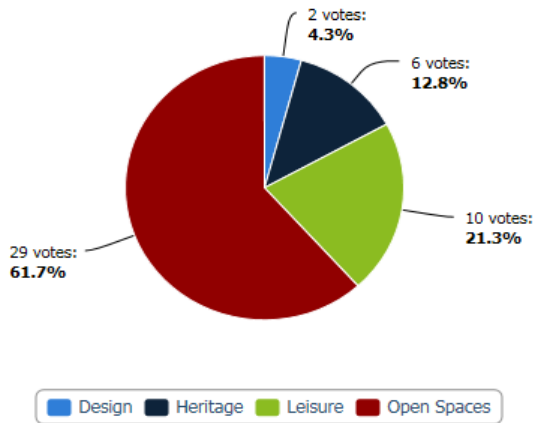


Appendix 7 – Issues and Options - Social media

IBC Intranet

Vote now

What is your favourite thing about Ipswich?



The collage features several social media posts from Ipswich Council (@IpswichGov) on Facebook and Twitter. The posts include:

- A tweet from Oct 3: "It was great to see so many of you at the #IBCLocalPlan drop-in event today! Missed it? #HaveYourSay online: bit.ly/2zusOld" with a photo of a hand holding a leaflet.
- A tweet from Oct 5: "What facilities do you think young adults need in your area? #HaveYourSay on the #IBCLocalPlan. Find out more: bit.ly/2eXVhNl" with a photo of a group of people.
- A Facebook post from 14 September: "Have your say on a new Local Plan looking at the future development of Ipswich. Find out more: http://bit.ly/2n3Ttoz #IBCLocalPlan" with a photo of leaflets.
- A Facebook post from 23 November 2016: "Tomorrow is the last day to comment on the proposed changes to the Ipswich Local Plan. More information here: http://bit.ly/2gv18c0" with a photo of a historic building.

Appendix 8 – Preferred Options - Advertisement

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something!

Legal and Public Notices

**Ipswich Borough Council Local Plan
Planning and Compulsory Purchase Act 2004
Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 12 and 18)
Notice of Consultations**

(1) Core Strategy and Policies Development Plan Document Review Preferred Options
 (2) Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Preferred Options
 (3) Ipswich Town Centre and Waterfront Public Realm Strategy Supplementary Planning Document
 (4) Ipswich Urban Characterisation Study Supplementary Planning Document

Ipswich Borough Council hereby gives notice of its consultation on the Core Strategy and Policies Development Plan Document (CPD) Review Preferred Options; the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review Preferred Options; the Ipswich Town Centre and Waterfront Public Realm Strategy Supplementary Planning Document (SPD); and the Ipswich Urban Characterisation Study SPD. This table provides a summary, however full details of the consultations can be found below. The consultation period is eight weeks for the CPDs, but six weeks for the SPDs.

Document	Type of document	Consultation start	Consultation finish	Length of consultation period
Core Strategy and Policies Development Plan Document Review Preferred Options	Development Plan Document	Wednesday 16th January 2019	Wednesday 13th March 2019	8 weeks
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Preferred Options	Development Plan Document	Wednesday 16th January 2019	Wednesday 13th March 2019	8 weeks
Ipswich Town Centre and Waterfront Public Realm Strategy Supplementary Planning Document	Supplementary Planning Document	Wednesday 16th January 2019	Wednesday 27th February 2019	6 weeks
Ipswich Urban Characterisation Study Supplementary Planning Document	Supplementary Planning Document	Wednesday 16th January 2019	Wednesday 27th February 2019	6 weeks

Details can be found below advising how representations can be made.

The consultation on the two CPDs will run for eight weeks commencing at 9:00am on Wednesday 16th January and concluding at 11:45pm on Wednesday 13th March 2019. The Core Strategy and Policies DPD Review Preferred Options sets out the vision for Ipswich in 2036 and the scale and distribution of development proposed across the borough. The Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review Preferred Options propose sites where development would take place in Ipswich up to 2036.

The Council is seeking views on the two proposed CPDs. Should you wish to make a comment, these may only be made in writing and are encouraged via the Council's local plan consultation module on the website of www.ipswich.gov.uk/consultations. Forms are also available via the website and in hard copy at drop-in exhibitions and the locations listed below and can be e-mailed or posted to Town Planning Business Support, at the address below by 11:45pm on Wednesday 13th March 2019.

The consultation on the two Supplementary Planning Documents (SPDs) will run for six weeks commencing at 9:00am on Wednesday 16th January and concluding at 11:45pm on Wednesday 27th February 2019. The Ipswich Town Centre and Waterfront Public Realm Strategy SPD sets out guiding principles to guide improvements to public spaces in Ipswich Town Centre and Waterfront and proposes some priority locations where investment could be targeted. The Ipswich Urban Characterisation Study SPD identifies assets and characteristics that are valued as distinctive elements of the townscape of Ipswich and give different areas their individual character. The SPD will enable valued characteristics to be taken into account when changes affecting an area are proposed as part of a planning application and will ensure that development and change reinforces local distinctiveness. The SPD is in three parts covering North West Ipswich, North East Ipswich and South East Ipswich.

The Council is seeking views on the two proposed SPDs. Should you wish to make a comment, these may only be made in writing or by email and can be e-mailed or posted to Town Planning Business Support, at the address below by 11:45pm on Wednesday 27th February 2019. If you wish to be notified of the adoption of the SPD, please let us know as part of your representation.

Inspection of documents:
 The documents will be available to view from Wednesday 16th January 2019 on the Council's website (www.ipswich.gov.uk/consultations) and at the following locations:
 Developer Services Centre, Town Hall, Cornhill, Ipswich (Mon-Fri 8.30am to 5.00pm)
 Ipswich County Library, Northgate Street, Ipswich (Mon, Weds, Thurs 10am to 4pm; Tues, Fri 10am to 2pm; Saturdays 8.30am to 5pm and Sundays 10am to 4pm)
 Graffton House Reception, 15-17 Russell Road, Ipswich (Mon-Fri 9.20am to 5.00pm).
 Paper copies of the consultation documents will be available at cost of printing plus P&P.

Drop-in exhibitions: Officers will be available to answer questions at the drop-in exhibitions, which will be held in the Town Hall Pickwick Room as follows:
 Saturday 20th January (10am – 4pm), and
 Thursday 14th February (10am-4pm and 5.30pm to 8pm)
 Date of notice: 16th January 2019

e-mail: PlanningPolicy@ipswich.gov.uk
 Planning and Development
 Ipswich Borough Council
 Graffton House, 15-17 Russell Road
 Ipswich IP1 2DE

**ROAD TRAFFIC REGULATION ACT 1984: SECTION 14
 TEMPORARY CLOSURE OF PART OF
 THE U5822 WARMUS ROADS, EYE**

Ipswich County Council intends to make an order closing that:
 1. U5822 Church Street, Eye from the junction with Wellington Road for 67 metres eastbound
 2. U5822 Wellington Road, Eye from the junction with Dove Lane for




Adverts placed in the East Anglian Daily Times and Ipswich Star

Appendix 9 – Preferred Options - Website

Ipswich Local Plan Review Preferred Options web page

On this page we provided comment forms with also a link to the [consultation module](#) site which allowed people to submit comments electronically during the consultation.

The screenshot displays the Ipswich Local Plan Review Preferred Options website. Key sections include:

- Popular tasks:** Local Plan Examination.
- Also in this section:** CLOSURE: Ipswich Local Plan Review Preferred Options Consultation; New Evidence Base documents for the Ipswich Local Plan Review to 2036; Adopted Ipswich Local Plan 2011-2031; Superseded Ipswich Local Plan 1997-2027.
- Contact Details:** Ipswich Borough Council, Planning Policy, 15-17 Russel Road, Ipswich, IP1 1NP. Phone: 01473 432019.
- Consultation Documents:**
 - Public Consultation:** The Council undertook a public consultation from Wednesday 10th January until Wednesday 13th March 2019.
 - Core Strategy and Policies:**
 - Core Strategy and Policies Development Plan Document Review Preferred Options
 - Plan 1 – District and Local Centres
 - Plan 2 – Flood Risk
 - Plan 3 – Conservation Areas
 - Plan 4 – Area of Archaeological Importance including Scheduled Ancient Monuments
 - Plan 5 – Ipswich Ecological Network
 - Plan 6 – Green Corridors
 - Site Sheets:** Provide further information on the allocated sites proposed, history of the site, the current use of the site and any development constraints/ issues that are relevant.
- Evidence Documents:**
 - Draft Statement of Common Ground with the Ipswich Strategic Planning Area authorities
 - Issues and Options Consultation Statement Nov 2018
 - Equality Impact Assessment
 - Statement of Compliance with the Duty to Co-operate
 - Topic Papers: Local Plan Policies Map, Local Plan Policies Map IP-One Area East, Strategic Environmental Assessment, Sustainability Appraisal and Habitats Regulation Assessment.

JDi Consultation module site

The screenshot shows the JDi Consultation module site. It features a login/register form with fields for 'New User' and 'Existing User'. Below the form, it states: "All responses are opinions of those individuals/organisations. Ipswich Borough Council accepts no responsibility for any factual inaccuracies." It also includes a section for "Current Documents Open to public consultation" and a "Privacy notice" section.

The screenshot displays the "Policy SP2 Land allocated for housing" page. It includes a table titled "Table 1 Land allocated for residential use or residential-led mixed use" with the following data:

Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
IP003	Waste tip and employment area north of Sir Alf Ramsey Way. Parts of the site are covered by facility relocation policies of the Suffolk County Council Minerals and Waste Local Plan. Alternative sites will need to be agreed with the County Council and the site operators for the relocation of the Concrete Ditching Plant and Household Waste Recycling Centre before the sites can be made available.	1.41 (50%)	114	90qph (DM22a lower end of range)	L
IP004	Bus depot, Sir Alf Ramsey Way. Allocated for mixed residential & B1	1.07 (c. 50%)	48	90qph (DM22a lower end of range)	L



Latest News

Emergency beds for rough sleepers

Rodin draws in thousands to Mansion

Your chance to play at Ipswich Music Day

Have your say on the future development of your town

Improving Ipswich's public spaces

Have your say on the future development of your town



Published 15th January 2019

Ipswich people are being asked for their views on the Borough Council's draft Local Plan, a new document charting the development of the town over the next two decades.

The Local Plan is a blueprint covering future areas for housing, retail, business and leisure to meet the needs of a growing population.

All councils have to produce a Local Plan every five years and the latest one reviews and updates a series of proposals that have helped to guide the sustainable growth of Ipswich.

The Council is launching its draft Local Plan consultation exercise tomorrow (16th January) and this will run until 13th March and everyone who lives or works in the town, along with local businesses and organisations, can have their say.

Councillor Carole Jones, Planning & Development portfolio-holder, said: "Our Local Plan is a document about the town and how we can shape it over the coming years."

The draft plan, which takes Ipswich through to 2036, includes a proposed new Opportunity Area for mixed development in West End Road, new housing allocations in several sites and town centre plans made in tandem with shopfront design guidelines.

A change in Government calculations means that the required housing allocation for Ipswich until 2036 has fallen from nearly 10,000 to 8,622. This reduces reliance on neighbouring councils but that partnership will continue as there is a shortage of development land inside the Borough.

The draft plan also addresses the changing trends of people's shopping and leisure habits, completes key regeneration sites and strengthens communities in the town.

The draft Local Plan will be adopted by the Council in early 2020 following submission to the Secretary of State.

Go online to www.ipswich.gov.uk/ipswichfuture and have your say. You have until 13th March to do so.

The Council is also taking its draft proposals to its Area Committees. The following are being held over the next fortnight:

South East: Wednesday 16th January, 7pm, Alan Road Methodist Church, Rosehill Road IP3 8EX

North West: Thursday 17th January, 7pm, St Raphael Club, Highfield Road IP1 4JP

North East: Thursday 24th January, 7.30pm, Ransomes Sports Pavilion, Sidegate Avenue IP4 4JJ

Public consultation meetings have also been arranged at the Town Hall on Saturday 26th January from 10am to 4pm and on Thursday 14th February between 10.00am and 4pm and then between 5.30pm and 8pm.

For further comment:

Cllr Carole Jones, tel: 07824 430158

Cllr Ian Fisher, opposition Conservative Group Leader, tel: 07702 038029

Cllr Inga Lockington, opposition Liberal Democrat Group Leader, tel: 01473 213444



Appendix 10 – Preferred Options - Consultation events and exhibition

“What is a Local Plan” Leaflet distributed at the exhibitions and area committees

Ipswich Borough Council Local Plan Review Consultation, 14th January – 13th March 2019


What is a Local Plan?

A Local Plan is a document which contains strategic and development policies to guide development in an area, typically over a 20 year period from adoption. It sets out the amount of houses and jobs that are needed. It also contains policies for specific sites, certain types of land (e.g. retail, community facilities) and areas that need to be protected as part of future development (i.e. historic buildings and ecological sites).

What does Ipswich Borough Council's Local Plan do?

Ipswich Borough Council adopted their current Local Plan in February 2017. The Local Plan is made up of the following documents:

- The Core Strategy and Policies Development Plan Document (CPD) review; and
- The Site Allocations and Policies Incorporating IP-One Area Action Plan (IPAP)




What is this Local Plan consultation about?

The Council is consulting on a review of the local plan to update policies to 2036 and to prepare aligned local plans with Basingstoke, Mildenhall and Suffolk Coastal District Councils, particularly in respect of strategic, cross-boundary issues affecting:

- Housing;
- employment; and
- retail and town centre uses.

The Local Plan review will supersede the adopted Core Strategy and Policies CPD and Site Allocations and Policies Incorporating IP-One Area Action Plan (IPAP) (February 2017) in due course.

The Council is also consulting on the supporting policies, plans, sustainability appraisal and appropriate assessment (Planning Regulations Assessment) documents.

 Ipswich Local Plan - Consultation

What is in each of the documents?

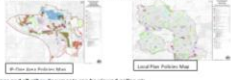
The draft Core Strategy and Policies CPD Review includes the following:

- Housing** – The need to accommodate at least 8,622 dwellings for the period 2018 – 2036. This equates to at least 479 dwellings annually (Policy CS2).
- The identification of a broad location for housing and associated infrastructure development at the northern end of Number One Lane beyond 2012 is included in policy (IPAP).
- The Ipswich Eastern Suburb – Details of the types of development the Council are seeking at the northern fringe of Ipswich, including 400a of public open space, at least 24 5ha for a Country Park and approximately 1,500 dwellings (Policy CS1) – please note, this policy has not recently changed from the adopted Local Plan).
- Jobs Growth** – Encouraging the provision of approximately 15,500 jobs in the Borough between 2018 and 2036 which will require around 28.7a of employment land (Policy CS3).
- Development Management Policies** – Including new policies, DM1 Air Quality, DM24 Driftwood Design, DM28 Evening and Night Economy, DM33 Delivery and Expansion of Digital Communications Networks.

The draft Site Allocations and Policies (Incorporating IP-One Area Action Plan) CPD Review includes:

- Allocations for housing and developments, including sites previously identified in the town centre and at the Margaret, and an area adjacent to Holywell Road, and at West End Road (formerly West Lane) within a new Opportunity Area).
- Allocations for employment uses, including 7.2ha at the Airport Farm Kennedy (IP12), 6.53ha at land north of Whitton Lane (IP14) and 4.82ha at land at Futaba Park, Nacton Road (IP14);
- An extension to the Great Country Park (at Post Mill Car and farm (IP14)), and
- Retail allocations as part of mixed-use developments at the former Civic Centre (Wareham) (IP04), on the west part of the North Quarter (IP04B), and at March Bridge on Liberty Avenue.

The Local Plan Policies Map and IP-One Area Action Plan (IPAP) demonstrate policies and site allocations visually:




Full versions of these maps and all other documents can be viewed online at: <https://www.ipswich.gov.uk/development>

How to Respond:

You can submit your comments electronically using the Council's online consultation module, or by email to planning@ipswich.gov.uk or using the comments form available on the website (see above link). Paper copies of the comments form will also be available at the 'drop-in' exhibitions held at Ipswich Town Hall in the following dates:

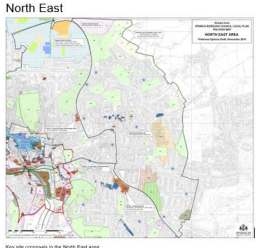
Thursday 20th January (2pm – 4pm) & Thursday 26th February (2pm – 4pm) and 5:30pm – 8pm)

Comments must be received no later than 11.45pm on Wednesday 13th March 2019.

 Ipswich Local Plan - Consultation


Examples of presentation boards for public exhibitions and Area Committees

North East

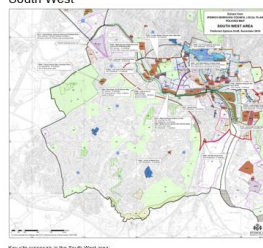


Key site proposals in the North East area:

- Small location for future housing provision (2011) at a mix of residential (Opportunity Area).
- Housing allocation to provide for 125 new dwellings, 15a of which will be developed as part of the St Clements Hospital Redevelopment (IP15).
- Continuation of the Heath Road Hospital Site to health and activity uses.
- Identification of land for replacement playing fields at the Ipswich Eastern Suburb – please see the Core Strategy Review for more detail.


 Ipswich Local Plan - Consultation

South West

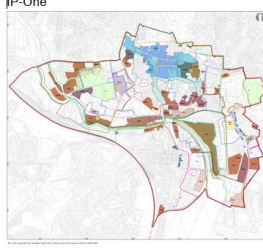


Key site proposals in the South West area:

- Housing allocations within the IP-One area to provide for 141 new dwellings, 101 of which will be on Park Road (IP12) and Leavenham Road (IP12).
- New housing allocations made to IP-One area to provide a total of 553 dwellings including new allocations close to West End Road as part of the West End Road and Grand Opportunity Area (ITE dwellings).
- Housing allocation to provide 13 dwellings in mixed-use at the Prince of Wales Civic Centre (IP17).
- Employment and allocations for industrial uses between Holywell Road and the railway junction, as well as an office extension adjacent to Park Road (IP11).


 Ipswich Local Plan - Consultation

IP-One



IP-One is an area of central Ipswich where much of the planned development is focused. It includes:

- The town centre, which is the focus for office and leisure uses, retail and tourism – allocations include a new residential and 175 dwellings (Opportunity Area along the town front, and for office development at Park Road, residential development at Grand Road (IP12B and 12C) and new residential allocation along Grand Road for employment uses (IP15 and 15B).
- The Central Shopping Area, which is the focus for shops, financial services (e.g. banks and cafes – allocations include a large new allocation for opportunity retail and residential development at the Old Quarter (IP04B and 1) and a new retail use of the Market Bridge (IP14C).
- The Waterfront, which is a [planning](https://www.ipswich.gov.uk/development) area and includes the redevelopment of the former site (IP17).
- The Education Quarter where the focus is on education and related uses (e.g. student accommodation).

 Ipswich Local Plan - Consultation

Comments form

Planning documents to which this completed form refers:

Please insert this comments form to:

Return to: **1. Ipswich Core Strategy and Policies Development Plan**
2. Ipswich Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document
 You can also use this form to comment on the **Ipswich Core Strategy and Policies Development Plan Document** (January 2018) and the **Planning Regulations Assessment** (January 2018) and the **Planning Regulations Assessment** (January 2018) and the **Planning Regulations Assessment** (January 2018).

This form has two parts:

Part A – Personal Details
 Part B – Your Comments

PART A - PERSONAL DETAILS

Name: _____
 Title: _____
 First name: _____
 Last name: _____
 Job title (where relevant): _____
 Organisation (where relevant): _____
 Address: _____
 Postcode: _____
 Email: _____
 Telephone No: _____

PART B - YOUR COMMENTS

Signature: _____ Date: _____

For multi-part users (not applicable to organisations), we would like to hold your contact details to the Local Plan Review consultation process so that we can contact you in the future regarding planning matters. Please put a tick in the box if you consent to us holding your details.

**Public Consultation Ipswich Local Plan
Review Preferred Options**
9.00am 16th January – 11.45pm 13th March
2019

Town & Country Planning (Local Planning) (England) Regulations
2012 (Regulation 18)

Consultation Comments Form



e-mail:
planningpolicy@ipswich.gov.uk
Planning and Development
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE.
website:
www.ipswich.gov.uk

Appendix 11 – Preferred Options – Media and Publicity

Twitter and Facebook

Ipswich Council @ipswichGov · Feb 13

Planners will be at the Town Hall tomorrow (14th Feb) between 10am–4pm and 5:30pm–8pm to talk to you about the Local Plan Preferred Options and how you can review its vision, objectives, policies and site allocations as part of the current consultation running until 13th March.



7

Ipswich Council @ipswichGov · Jan 9

Throughout January our Planners will be going to @arecommittees to talk to you about the #IBCLocalPlan & how you can review its vision, objectives, policies & site allocations. The consultation starts on 16 Jan. View meeting locations and times: bit.ly/20GfqYJ



1

Ipswich Borough Council

9 January

Throughout January our Planners will be going to Area Committee meetings across Ipswich to talk to you about the Local Plan and how you can review its vision, objectives, policies and site allocations. The official consultation runs from 16 Jan to 13 March.

Area Committee schedule:

- 📅 9 Jan - Central
- 📅 10 Jan - South West
- 📅 16 Jan - South East
- 📅 17 Jan - North West
- 📅 24 Jan - North East

Meeting locations and times can be found at <https://bit.ly/20GfqYJ>



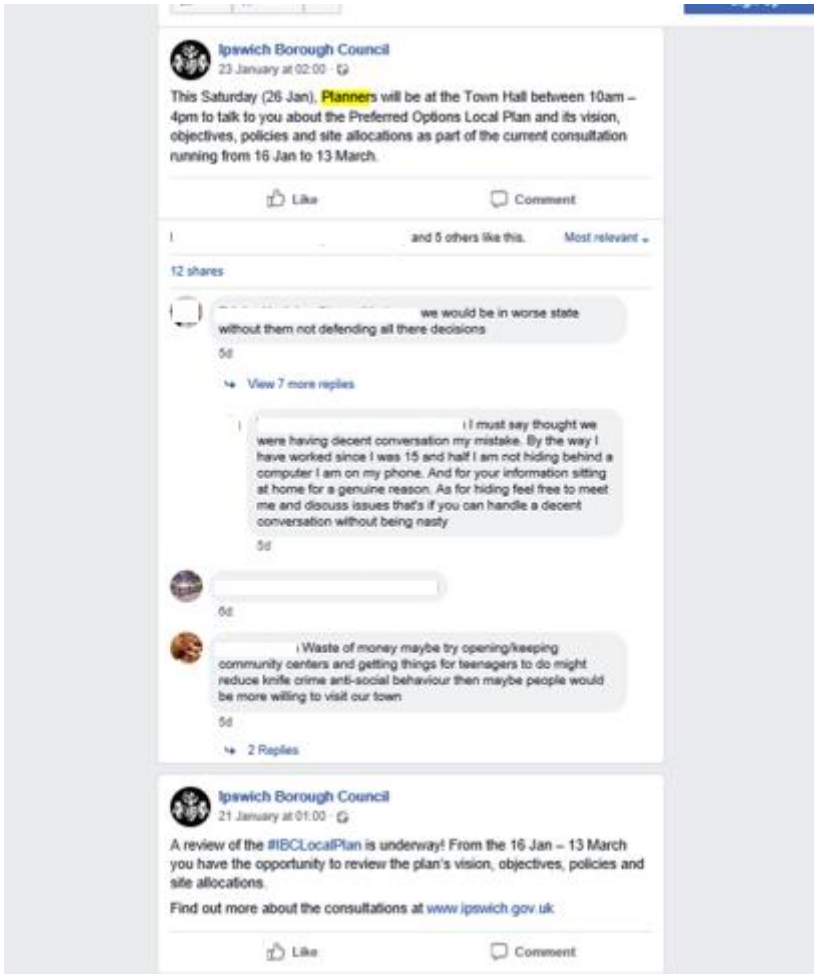
2,707 People reached

55 Engagements

Boost Post

5

4 shares



Facebook

Ipswich Borough Council 23 January · 🌐

This Saturday (26 Jan), Planners will be at the Town Hall between 10am – 4pm to talk to you about the Preferred Options Local Plan and its vision, objectives, policies and site allocations as part of the current consultation running from 16 Jan to 13 March.

5,258 People reached 547 Engagements [Boost Post](#)

👍👎 9 18 comments 12 shares

Ipswich Borough Council 13 February · 🌐

Planners will be at the Town Hall tomorrow (14th Feb) between 10am–4pm and 5:30pm-8pm to talk to you about the Local Plan Preferred Options and how you can review its vision, objectives, policies and site allocations as part of the current consultation running until 13th March.



3,867 People reached 187 Engagements [Boost Post](#)

👍 6 4 comments 7 shares

Appendix 12 – Issues and Options – Full List of Representations & Responses

Part 1 Strategic Questions					
Key Issues & SA Scoping	Q1: Are there any other issues that the Local Plan should consider?	Mersea Homes	Ipswich's housing delivery rates have been poor over the last seven years - therefore, housing delivery and viability should be recognised as key issues.	The Council recognises the importance of the issue and has addressed the matter by offering several growth scenarios to bring about debate in the Issues and Options consultation document. The responses and the final draft plan will address the issues of housing delivery and viability, e.g. through whole plan viability testing.	254 80
		Ipswich Community Media	Innovative use of older / unused / or seemingly not productive places rather than knocking down - using premises for arts can generate revenue. The arts are a growing economy. Bring the artists and professional creative into the conversation. We have a 100 Strong professional creative network in Ipswich.	The value of the Arts in helping to create a sense of place and community is understood. "Public Art" is addressed in broader terms in the Policy DM5 "Design and Character" and will be the subject of consideration in individual applications, when developer, Council or joint funding can be made available.	254 61
		Orwell Ahead	We believe that with a re-thinking of district boundaries, the Orwell Peninsula (Ipswich to Felixstowe) area could deliver ambitious economic growth along with a significant increase in housing numbers. The duty to cooperate is inadequate. We believe there must be a single local plan for the Great Ipswich and Felixstowe area).	The Orwell peninsular will remain an important element in the spatial planning of the Borough. Under the council's duty to cooperate with adjoining authorities the important inter relationships between Ipswich and Felixstowe will be tested and if found inadequate the plan will not be found sound. It is therefore an imperative to resolve the issues of economic growth and housing delivery.	254 94

		Suffolk Wildlife Trust	We recommend that the issues are expanded to include the need to secure ecological enhancements as part of new developments.	All key habitats are to be secured by virtue of the Plan Policy CS4 and national NPPF policies that safeguard important ecological assets. Policy CS4 provides for the conservation and enhancement of assets and seeks appropriate planning obligations to secure agreed enhancements.	250 01
		On Behalf of Aquigen	It is essential that the emerging Plan promotes and supports growth in key employment sectors. The business sector is an important element of the local and wider sub-regional economy. The Plan should also however recognise the importance of other employment sectors including retail, leisure, entertainment and recreation.	Comment Noted: for the plan to found sound it needs to develop a broad and supportive stance towards the delivery of economic regeneration and developments; in combination with environmental and social policies. Policies CS13 and 14 in particular offer encouragement for jobs growth in employment uses, including Retail.	250 96
		Northern Fringe Protection Group NFPG	<p>Are Babergh and Mid-Suffolk prepared to work with Ipswich and Suffolk Coastal to address cross-boundary issues and deliver additional homes?</p> <p>Add reference to increasing levels of violent crime in Ipswich and fear of personal safety (especially at night).</p> <p>Falling house sales in Ipswich caused by e.g. stamp duty changes and people choosing to extend.</p> <p>The poor coordination of utility works. A permit system is urgently required to minimise disruption.</p> <p>Ipswich has sub-standard cycling infrastructure, which requires major improvement in order to encourage</p>	The groups concerns are noted and will be addressed as part of a range of policies that are being developed. These policies are required to be developed under the duty to cooperate which will be tested by an inspector at Inquiry. The local plan will address those matters raised where land use planning policies can have an impact. Development management policies will be unable to deal with non-planning matters such as the impact of Brexit or house prices.	249 54

			<p>sustainable travel and reduce congestion.</p> <p>Ipswich now has five AQMAs.</p> <p>The need to create more high-quality and better-paid jobs to improve the economy.</p> <p>Assess the impact of BREXIT on the SHMA.</p>		
		Save our Country Spaces SOCS	<p>Falling house sales in Ipswich (50% over last two years). Population adjustments due to Brexit and shifts in population and local Ipswich demographic. Acknowledge and factor in the stark reality of the jobs and employment situation and trends within Ipswich. Factor in post-Brexit increases likely in food prices; food security and the need to grow more at home; the terrible loss of Grade 2 farmland in North Ipswich. Ipswich cycling infrastructure requires major improvement to encourage sustainable travel and reduce congestion. However, poor Air Quality in key areas works against a successful cycling, walking strategy and Public Health thrust.</p>	Please see comments above	250 34

		<p>Historic England HE</p> <p>We welcome the identification of the high number of heritage assets in Ipswich and Suffolk Coastal in the environmental considerations. However, what this means is not elaborated on. The 2016 Local Authority Profiles note that Ipswich alone has 457 listed buildings, 8 scheduled monuments, 3 registered parks and gardens, and 15 conservation areas. This is a significant number of designated heritage assets in a tightly bounded authority, reflecting Ipswich's long settlement history and historic development. It is not just the high number but also the density and significance of the heritage assets which is key.</p>	<p>Comments Noted - The heritage assets are set out in the supporting text to Policy CS4 which will offer appropriate levels of safeguarding.</p>	<p>248 92</p>
		<p>On behalf of RSPB</p> <p>The RSPB welcomes that the Council recognises the network of wildlife-rich sites, species and habitats; the need to invest in renewable energy; recognition of the need to tackle the threats posed by climate change and the foresight to extend and enhance the Green Infrastructure network across the whole Ipswich Housing Market Area (IHMA).</p> <p>The critical element is an overall commitment for enhancing biodiversity and this should be at the forefront as an environmental issue in order to be consistent with the national planning policy framework (NPPF).</p>	<p>The Council welcomes the general support from the RSPB but believes the balance of its approach to habitat and ecological issues is appropriate. The Plan will be read in conjunction with the NPPF which is a national policy document whose framework does not need to be repeated in each plan area.</p>	<p>246 91</p>

		Private individual	Social issues need to be a big focus of the plan moving forward. Current and previous plans have clearly failed to address the issues identified as parts of the town have become no-go areas.	The Council and its partner organisations do not recognise the concept of "No-go" areas but accepts that some communities may experience deprivation. The Local Plan will try to promote improvements by providing land for houses and jobs.	246 50
		Suffolk Constabulary	<p>Ensuring security and crime reduction measures are a compulsory element of all planning applications.</p> <p>Improving housing standards in the private rented sector, to include minimum security levels.</p> <p>Provision of services for young people to deter them from criminal activity.</p> <p>Enhanced provision of services to support people out of substance misuse.</p> <p>Outreach services for vulnerable people who may either be at risk of being victims or at risk of becoming involved with crime.</p> <p>Increased means of encouraging community integration, especially for communities where English is not the first language.</p> <p>Means of deterring people from repeatedly committing criminal and/or anti-social behaviour (i.e. evicting problem tenants).</p>	Although the reasons are understood the Constabulary has proposed some additional issues for inclusion that are beyond the remit of Land Use Planning. While social facilities may be made available through the delivery of infrastructure explained in the plan and secured through planning obligations some of the additional items are not matters that may be delivered through Land Use Policies. The Council will continue to work with the Police to deliver services and facilities that meet the aims which underlie these comments.	248 39

			<p>More effective use of powers to deter ASB/criminal behaviour in communal/public areas such as Jubilee Park, churchyards and parks.</p> <p>Need to consider terrorism mitigation features in all developments. Enhanced CCTV coverage across the town.</p>		
		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	<p>Comments on the wider impact of planned growth on all local Health services and infrastructure needs to be co-ordinated through wider consultation with the health economy and CCG led forums established to inform the Sustainability and Transformation Plan for the locality. The implementation of the plan will result in extensive transformation to the way that health and care services are delivered, potentially including changes to the physical infrastructure. It would be helpful to NHS England and the CCG if feedback received as a result of this consultation to questions 31, 104 and 105 could be shared.</p>	<p>Comments noted. There are a number of means for the objectives of the CCG Sustainability and Transformation Plan to become better integrated with the Council's Development Plan documents. The Consultation documentation will be made public.</p>	248 91
		Private individual	<p>Social issues (Ipswich): Need for enhanced, safer access for</p>	<p>Access and design issues are to be controlled using the revised Policy DM12.</p>	247 14

			pedestrians, especially for people with disabilities, to the amenities, shops, offices and public spaces in and around the city centre.		
		Environment Agency	<p>Although Ipswich will soon benefit from the new Ipswich Tidal Flood Barrier, there remains residual tidal flood risk from barrier failure as well as fluvial flood risk from the River Gipping and neither should be overlooked. There is no mention of the Water Framework Directive (WFD), and the requirements and obligations laid out in the Anglian RBMP. This links to water quality, but also ecology and amenity. Overall, the plan should give greater consideration to the management and enhancement of the water environment.</p> <p>The existing SFRA does consider the new Ipswich Tidal Flood Barrier and associated works, due for completion by April 2018. It is unclear if there is an intention to undertake a new SFRA, if so we would recommend discussion with ourselves with regard to this work. We are currently preparing new flood models for the River Gipping and the coast and estuaries. These are unlikely to be available until post-submission so they cannot be included in any new SFRA or the Local Plan, but they may need to be taken into account by developers in their FRAs. The Local Plan must</p>	<p>The essential tenets of the "Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy" have been used in the drafting of the Council's Policy DM4 "Development and Flood Risk". The Anglian River Basin Management Plan is referenced and explained in the reasoned justification following Policy CS4: PROTECTING OUR ASSETS.</p>	25174

			also have regard to the Anglian river basin district River Basin Management Plan (RBMP) 2015. The RBMP is referred to in the SA Scoping Report, but it should help underpin and inform policies and approach in the plan. It is not clear if this is the case to date.		
		Ipswich Limited	<p>The Local Plan is too focused on residential aspects with very little regard to employment, environment and infrastructure.</p> <p>Ipswich has significant employment in sectors which are under threat when the UK exits the EU.</p> <p>Ipswich has a significant problem with homelessness there must be inclusion of a strategy to deal with this problem.</p>	Comments Noted - However the Council believes that there is an appropriate balance between the various aspects of the plan. The Council's Housing Strategy addresses issues relating to Homelessness. The Council will also respond to the Government's Rough Sleepers Strategy published in August 2018.	252 56
		Private individual	One large Council combined Suffolk Coastal, Mid Suffolk, Babergh and Ipswich Council.	The likelihood of further reorganisation to create a single council is not a local plan issue but cooperation between the Councils is required to ensure the correct apportionment of homes and jobs within the Ipswich Policy Area. This "Duty to cooperate " will be set out in a Statement of Common Ground which includes the other authorities mentioned.	255 09

		Private individual	Greater areas for pedestrians in the town centre. Expansion of the shuttle bus service to all leisure centres and commercial services.	The issues raised are the subject of the policy CS20. Suffolk County Council has ben unable to continue funding of the Shuttle Bus service and therefore it has contracted.	255 20
		Private individual	Why don't IBC planners understand the local area? My concerns are the planning department are antiquated in thoughts and if it doesn't affect them personally, they are not bothered. Offer strange advice which makes me feel they do not understand the local area or community. IBC need to engage directly with the community. Stop reducing light to existing residents by doing away with high-rise. Sunlight helps all. Do we need to infill every spare bit of land with housing? No. There are so many empty buildings and half-built things in Ipswich and these should be looked at first. There is nothing for the people of Ipswich to make them stay.	Comments noted - The Core strategy needs to develop policies which deliver new homes and places of employment in Ipswich. This issues and options consultation is the latest of a number of public consultation events that aims to help the public engage with the local plan. The design and layout of future development will need to consider amenity and density of development issues and these matters are covered by a range of Development Management Policies	255 05
Vision for Ipswich HMA and FA	Q2: What are the advantages of your area that should be protected through local plans?	Suffolk Wildlife Trust	The Borough and surrounding areas have a wide network of wildlife-rich sites, ranging from those of international importance (such as the Stour and Orwell Estuaries Special Protection Area (SPA) to those of more local importance. These sites are part of a valuable network and the Local Plan must protect all areas of ecological value. This should include sites designated for their nature conservation	Policy DM31 explains the hierarchy of protection that may be afforded to the range of key natural habitats and geodiversity interest sites in the Borough. County Wildlife sites are identified in the proposal maps and a network of ecological sites is encouraged.	250 02

			interest, including County Wildlife Sites (CWS), and areas of greenspace that, whilst undesignated, contribute to the overall biodiversity value of the area.		
		Northern Fringe Protection Group NFPG	Due to the confined boundaries of Ipswich Borough, there is an urgent need to protect existing green and open space and improve usability.	Comments noted - please see comments above. The Local Plan promotes the protection of Open Spaces in Policy DM5 of the Preferred Options document.	249 55
		Greenways Countryside Project	This area benefits from a spectacular natural environment with internationally important wildlife populations and habitats. This resource contributes hugely to the quality of life for residents and is not replaceable, so should be protected at all cost.	Comments noted - please see comments above. The Preferred Options will also promote care of the Natural Environment through Policies CS4 and DM8	249 35
		Suffolk Preservation Society	A high quality historic environment rich in designated and non-designated heritage assets including listed buildings, conservation areas and parks and gardens. The Borough abuts the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty, a nationally designated landscape, and impacts of development on the setting of which should be accorded full weight in the development plan.	The Borough's wealth of Listed Buildings and its 15 Conservation Areas are recognised and protected in the Preferred Options DPD in Policy CS4 and DM13. Similarly, the important Suffolk Coasts and Heaths AONB is afforded protection by Policy DM11. When coupled with the National Guidance contained in the NPPF the Plan is considered sufficiently robust to protect in the manner expected by the SPS.	246 94

		Historic England HE	Ipswich has a rich historic environment and policies should be based on a clear understanding and recognition of the importance of this to the quality and distinctiveness of the town as a whole. This requires a strong evidence base though any evidence base should be proportionate. However, with a local plan we would expect to see a comprehensive and robust evidence base to support policies. Sources include: National Heritage List for England; Heritage Gateway; Historic Environment Record; heritage at risk registers; locally listed heritage assets; conservation area appraisals; historic characterisation; archaeological assessments; topic papers; (list continues).	Comments noted. The Council considers that the evidence base, including Conservation Area character appraisals and urban character studies to be strong. It is also adopting an Archaeology SPD linked to the new urban archaeological data base which together shed more light on the town's past and evolution.	248 95
		On behalf of RSPB	A network of wildlife-rich sites around and through the borough recognised through the highly commendable Ipswich Wildlife Network.	Please see comments to entry 25002 above.	246 47
		Ipswich Wildlife Group IWG	The area includes many important natural environment sites that should be protected in their current state. It holds important wildlife and habitats that make a significant contribution to the quality of life for residents.	Please see comments to entry 25002 above.	248 19
		Suffolk Constabulary	Good provision of quality urban parks and associated historic buildings, providing a recreational and educational resource.	Support welcome	248 40

		Private individual	The main advantages of Ipswich Town Centre include the variety of commercial buildings, shops and historic buildings. These should be preserved and protected and access to public spaces and buildings should be improved for all. I look forward to a town centre that is friendlier and more accessible for pedestrians, especially people with disabilities.	The Policies address accessibility e.g. Preferred Options Policy DM12, and will be supported by the Public Realm Strategy SPD currently being prepared.	247 15
		Private individual	My area (Copdock & Washbrook) is just outside of Ipswich and currently forms part of a green belt around the Town and should be kept as such. Rather than being overwhelmed with housing and industrial development.	Comment noted - the boundaries of the Borough are described in the proposals map and the policies seeking to prevent development outside would be set out in neighbouring Council's Local Plans.	247 41
		Private individual	Open spaces and allotments are important to a town such as Ipswich which has tight boundaries and very little space to expand. They help break up the 'townscape' and add character. The town's heritage is also important, particularly given the many listed and non-designated buildings. The further conversion of pubs to retail use should be resisted.	Allotments will continue to be protected and new provision requested in development via policies DM5 and DM6 respectively. Public Houses are the subject of the broad protection offered by Policy DM23 -Protection and provision of Community Facilities - this policy now includes a requirement that a marketing strategy, for the public house, must be agreed with the Local Planning Authority prior to applying for planning permission for change of use or redevelopment.	247 65

	Environment Agency	<p>The River Gipping as it flows through Ipswich and the Orwell estuary are overlooked in the Plan. The River Gipping in Ipswich is a neglected asset that is not accessible to people. It is a degraded environment that is hidden from view and not celebrated as one of Ipswich's key assets. The new Local Plan for Ipswich should include proposals to enhance the visual and ecological quality of the river and estuary, engage people with the river and detail how water quality will be maintained and improved in the river while the population of Ipswich increases. Developers proposing to build on land adjacent to the river should contribute to improving the water and habitat quality in the river. This should include contributing to the cost of removing redundant in-river structures that are of poor visual quality, are a health and safety and maintenance liability and prevent the free movement of fish and eels in the river.</p>	<p>The river path along the Gipping links the Waterfront to Sproughton and is well used. The Plan includes proposals for bridges to link with it. A new opportunity area has been identified with the aim of improving access along the River Gipping at West End Road. Therefore, the Council cannot agree that the River and estuary are overlooked.</p>	251 86
	Pigeon Investment Management Ltd	<p>Good network of parks and greenspaces.</p> <p>Good transport links by rail to London and road via the A12 and A14 which can encourage business growth.</p> <p>Mixed economy of office, industrial uses and working docks.</p>	<p>Commentary and support noted- The Housing requirement will reflect the Government's new methodology.</p>	253 57

			<p>University that can educate a local workforce.</p> <p>House prices in the Borough are not as high as other nearby areas in Essex, West and East Suffolk and Cambridgeshire making the town more affordable and thereby assisting businesses in recruiting staff. The provision of new housing to meet the objectively assessed need of the housing market area will ensure that housing remains affordable.</p>		
	Q3: What are the disadvantages of your area that the local plans could try to address through the way land is used or developed?	Ipswich Community Media	<p>We have a sorely neglected area that has an estate with many boarded-up areas; perhaps it would be fruitful to address a route to have community facilities that can bring safety, life and hope to some of these emerging communities? A long-standing empty boarded pub? Could communities be supported to understand how they might be empowered to use it?</p> <p>Green areas - proven to bring a different energy to people, health wellbeing and areas.</p>	Comments noted. The Council is willing to explore the possibility of designating community assets such as a key community building when they become redundant. Although this would not be a matter for the DPD further details may be found on the Council's web site.	254 62
		Northern Fringe Protection Group NFPG	<p>Transport/congestion/poor sustainable travel options and air quality. Lack of high-quality jobs and the need to improve green space/corridors.</p>	The Preferred Options Core Strategy and Policies Document offers policies and proposals which cover each of the issues raised. A new policy concerning Air Quality is proposed.	249 56

		Save our Country Spaces SOCS	Transport/congestion/poor sustainable travel options and air quality. Lack of high-quality jobs and the need to improve green space/corridors.	The Preferred Options Core Strategy and Policies Document offers policies and proposals which cover each of the issues raised. A new policy concerning Air Quality is proposed.	250 35
		Suffolk Preservation Society	A number of brownfield sites along Star Lane and Grafton Way which interrupt the connectivity between the historic core of the town and the Waterfront. Environmental improvements to these important streets would facilitate the regeneration of the town.	Ipswich Town Centre and Waterfront - Public Realm Strategy was published in March 2018 and features analysis and proposals for the suggested areas. In this context no further changes to policy are suggested. Sites e.g. Turrett Lane, are allocated for development through the site allocations plan.	246 95
		Tuddenham St Martin Parish Council	The development restrictions on villages included in the category of 'Other Village' in the Settlement Hierarchy classification sterilises any improvement of the village and prevents any housing development. Tuddenham St Martin Parish Council has strong objections to any potential plots identified which would add to the physical separation of villages from Ipswich and also have a negative impact on the highway infrastructure and limited school provision in the area.	The settlement hierarchy that includes Tuddenham St Martin features in the local plan for Suffolk Coastal. The Plan retains the strategy to support the identity and separation of villages, Policy DM11-Countryside but land at the edge of the Borough will be needed to meet housing needs.	249 22
		Historic England HE	Further work to improve the evidence base on the Ipswich Waterfront and its connectivity to the town centre. The strategic direction for this area lacks clarity with the layers of the Ipswich Vision, IP-ONE areas and individual site allocations. The relevant conservation area appraisals are notably out of date	HE's position is noted. Conservation Areas are being reappraised currently. The Merchant Quarter opportunity area covers the area between the waterfront and the centre.	248 96

			and the key area of connectivity between them is not covered by a conservation area, despite the significant heritage in the area. See also answer to Question 85.		
		Private individual	Large areas of Ipswich remain undeveloped and a great focus should be placed on developing these. A number of retail units along Duke Street and Stoke Quay remain empty years after the developments were completed - this should act as a warning that the approach used here does not work.	The Council is encouraging the reuse of previously developed land with a number of promotional policies. These will provide a framework for the delivery of regeneration of sites in Ip-One and other key sites.	246 51
		Suffolk Constabulary	<p>Town centre has numerous empty premises which attract ASB and criminal behaviour.</p> <p>Lack of community cohesion, especially amongst those who do not speak English, leading to isolation.</p> <p>Lack of appropriate facilities for young people.</p> <p>Housing vulnerable people and those inclined to criminal/ASB activity together (i.e. in the same block of flats)</p>	Comments and concerns noted. The solutions can only be addressed in part by a land use planning document. Policies aim to provide flexibility to enable appropriate new uses to be found for vacant buildings.	248 41
		Private Individual	There is an urgent, pressing need for an ambitious project that will a) reduce the number of road vehicles circulating around the town centre, especially through College Street and Star Lane, b) join up the Waterfront with the town centre by	The Council will consult on the preparation of an area action plan for the core of the Borough. Policy CS3 sets out the objectives for the Plan and will promote the changes which this submission is seeking.	247 16

			creating more pedestrian/cyclist areas and c) transform the unsightly brown sites close to the Waterfront through intelligent, cost-effective development.		
		Private Individual	<p>The dual carriageway Old London Road leads on to Chapel Lane / Swan Hill. It is overwhelmed when there are problems with the Copdock Interchange and when accidents or closure affect the Orwell Bridge.</p> <p>Anything other than small scale development will add to traffic problems. The road infrastructure needs attention before any large-scale building is approved.</p>	Comments noted. The Plan is supported by transport modelling which indicates that waiting times at some junctions will increase at peak times. The plan includes sustainable transport proposals to help address this.	247 42
		Private Individual	Continuing expansion of retail centres and business parks on the east side of Ipswich act as honeypots for more traffic congestion. The local plan should aim to bring greater focus to the town centre and the Waterfront area. There remains undeveloped land between the town centre and the Waterfront area and on the Waterfront itself. The one-way road system between the town centre and the Waterfront badly needs improvement.	Comments noted please see response to the point above.	247 66

		Pigeon Investment Management Ltd	The town has not reached its potential in terms of retail or employment growth. The amount and type of new housing delivered in the Borough has been constrained for many years with under provision of good quality family housing as a result of the focus on high density development. This has constrained retail and employment growth. If projects like the northern fringe had been started say 15-20 years earlier than the growth of housing would have helped enhance the town centre through increased demand for retail services and would have improved the local employment base by providing a greater workforce.	Each of the topics raised in the response, (housing, retail and employment) are the subject of market forces that will determine the timing and delivery of development. These influences are beyond the control of planning policies as are the continuing and fundamental changes that are being made to the way that we shop.	253 58
	Q4: What are the key priorities you would like to be addressed by 2036 – in the places across Ipswich and Suffolk Coastal where you live, work or study?	Orwell Ahead	New Anglia LEP Board representation for Ipswich & Felixstowe area should never fall below 30% (or below our zone's percentage of GVA for Norfolk & Suffolk). There should be a permanent New Anglia LEP board position for the Felixstowe Port Users Association or the Port of Felixstowe. Ipswich Borough Council should re-join the Haven Gateway. New Anglia LEP should be working in greater partnership, or association, with Haven Gateway. All parties should make it a priority to lobby for a Greater Ipswich Orbital (Northern Bypass) in the next government spending round.	The Council's decision to withdraw from the Haven Gateway Partnership does not affect the way in which the high-level economic issues raised are considered. The duty to cooperate and the Ipswich Strategic Policy Area meetings are held to coordinate planning related matters between IBC, Babergh/Mid Suffolk, Suffolk Coastal and the Suffolk County Council. This means that the issues mentioned are properly discussed and monitored.	254 95

			We are urgently calling for a business and academic led member group dedicated to the successful growth of Greater Ipswich & Orwell. Ipswich Policy Area must have permanent and proportionate representation at SCC cabinet (or Committee) level.		
		Suffolk Wildlife Trust	In relation to the top priorities identified for Ipswich Borough we recommend that a definition of 'sustainable' is included in the document. In relation to the environment, this should include the priority to create a thriving, enhanced natural environment for the benefit of people and wildlife.	The Core Strategy and Policies Document offers policies and proposals which cover the way in which the Council is seeking to deliver its responsibility for sustainable development. Further definitions of Sustainability are considered likely to duplicate these and the guidance offered by the NPPF.	250 03
		On Behalf of AqiGen	In order to achieve the level of consistency required, we recommend that any development targets identified in the SEP are aligned with the Evidence Base and eventual set of targets selected for the Local Plan. This will clearly need to be the subject of review and consideration as the Local Plan evolves.	Comments noted. The economic evidence for the plan includes sector needs assessment.	250 97
		Suffolk County Council SCC	Under Questions 4 and 5, the Borough Council should be aware of the County Council's Corporate Priorities set out in 'Our Priorities,	Comments noted and accepted	254 47

			2017-21'. They are consistent with the NPPF and of direct relevance to this Plan. The SCC priorities are inclusive growth, health, care and well being and efficient and effective public services. The priorities are relevant to NPPF statements.		
		Northern Fringe Protection Group NFPG	Infrastructure, infrastructure and infrastructure. In particular, road improvements to ease congestion and measures to improve air quality. It is clear that existing infrastructure - especially the transport network - is already failing. It is also important to deliver high quality jobs thereby increasing the average wage of Ipswich residents and to protect the decreasing green areas in Ipswich Borough. All these measures have an important role to play in improving the health and well-being of Ipswich residents. Further expansion of Ipswich must be accompanied by infrastructure improvements.	The important role that infrastructure plays in creating sustainable development is accepted and the Council will continue to work with its partners to deliver a mix of initiatives to support development. The infrastructure needs of the plan period will be published as part of the draft plan.	249 57
		Save our Country Spaces SOCS	SOCS feel the entire thrust of the Local Plan growth and expansion agenda is inherently unsustainable. A clear and unequivocal determination of the wider infrastructure needs together with a reliable identified funding stream to meet these needs has to be determined and established first.	Please see comments above	250 36

		Suffolk Preservation Society	Focus on the historic environment as a key driver for regeneration of the town's economy	The Council recognises the importance of the Borough's history and will bring forward projects to enhance the town's historic environments in its "Public Realm Strategy". This is being prepared in conjunction with Conservation Area re-appraisals. In this way the Council expects to achieve a high degree of prominence for the historic environment among the range of economic drivers for regeneration.	246 96
		Private Individual	2 priorities for Ipswich. A) Redevelop the cycle network to make it easier for people to cycle, e.g. a direct route into town from the east. Encourage people to cycle from a to b instead of drive by giving them a serious credible option: a proper lane that is smooth, flat and separate from traffic. B) Re-evaluate the supply/demand for the main town. People go to the town centre for an experience and that has to be unique rather than replicating all other towns. Develop spaces for small retail, boutique businesses and specialist start-ups to thrive in.	A) The Council supports the provision and development of a cycle network for Ipswich and has adopted a cycling strategy SPD. In certain areas of the town provision may be constrained by historical residential development and the highway layout. The Council will continue to seek new opportunities to enhance the network as development proposals are brought forward on an individual basis. It should be noted that the Borough Council is not the Highway Authority and so does not have control over the existing highway network. B) The Core Strategy and Development Management document includes policies to safeguard the existing network of district centres and the core of the town centre. The creation of premises for a certain type of shop would be a matter for market forces and is a matter for the developer to determine rather than a local plan.	247 83
		Private individual	More well-paid jobs brought into the area. Expand on the success of the University of Suffolk. Create a safe and vibrant night-time economy.	Recommended priorities noted. The Council will seek to incorporate these three overarching priorities in the relevant policies of the Local Plan review.	246 52
		Suffolk Constabulary	Designing Out Crime standards to be compulsory for all new developments and redevelopments, at the earliest opportunity and in any sector. Action taken to protect/enhance public open spaces such as parks and churchyards to deter criminal/anti-social behaviour.	The Council already recognises the importance of securing quality, safer environments by engaging with the Constabulary and the Architectural liaison Officer in both Development Management and Major Project work. The Local Plan and Infrastructure delivery programme and s123 schedule of infrastructure needs will be the subject of further consultation if the Council proceeds with the Community Infrastructure Levy.	248 42

			Action taken to prevent buildings being out of use for extended periods (i.e. former pubs/shops etc)		
		Private Individual	My priorities for the area where I live (St Nicholas Street): safer roads for vulnerable road users (pedestrians, cyclists, wheelchair users etc.), better air quality.	The Core Strategy and Policies Document offers policies and proposals which cover each of the issues raised.	247 17
		Private Individual	Infrastructure.	The Core Strategy and Policies Document provide guidance and support for the delivery of Infrastructure and the Council will publish an Infrastructure Delivery Programme and s123 list of Infrastructure needs if the Council proceeds with the Community Infrastructure Levy.	247 43
		Private Individual	The one-way traffic system needs serious attention. I am not convinced replacing roundabouts, which allow a degree of free movement, with traffic signals, such as on Princess Street, actually contributes to any improvement in traffic movement. Rather the reverse.	Comments noted. The Borough Council is not the Highway Authority and so does not have control over changes to the existing highway network such as the example referred to.	247 67
		Environment Agency	We would wish to see Local Plans for Ipswich and Suffolk Coastal that take a holistic approach to sustainable development that benefits people, the environment and the economy. Open landscape is recognised in this plan as an opportunity to create habitat and reduce flood risk, but the provision of multifunctional open space also	The Council will build many of the principles of sustainable development into its project proposals. The Council intends to maintain its commitment to the "green rim" for the borough and include the North Ipswich Country Park within the Ipswich Garden Suburb.	251 77

			has the potential to improve a community's physical health and mental wellbeing and increase the monetary value of new development. The wider benefits of ecosystem services should be recognised, and the Plan should seek to both protect and enhance the natural environment.		
		On Behalf of Bloor Homes	Working collaboratively with neighbouring authorities on cross-boundary issues, including in relation to meet housing needs, should be a key priority for Ipswich Borough Council, particularly given the constraints of existing administrative boundaries. We note the collaborative approach being undertaken by Suffolk Coastal District Council and Ipswich Borough Council in seeking to address housing need and commend such an approach. Clearly, there is a strong functional relationship between Ipswich and Suffolk Coastal District and it is entirely appropriate (as per the NPPF) for the authorities to work together to ensure development needs are met sustainably.	The Council will work with neighbouring authorities where appropriate and where it has been identified that development could be secured through a cross-boundary arrangement.	252 20
		Ipswich Community Media CIC	An exciting cultural offer that comes from the grass roots	The Council will protect Community and Arts facilities through the local plan policies.	252 46

	Ipswich Limited	<p>Two tier local government doesn't work. The entire south east area of Suffolk deeply relies on each other; however, infrastructure, public transport and joined-up planning is appalling or non-existent. Many places have got out of this mess through a unitary authority.</p> <p>Ipswich desperately needs serious road infrastructure upgrades. Unfortunately, the only proposal on the table - an Upper Orwell Crossing is not suitable.</p> <p>Ipswich needs to establish its own science park and/or tech park. Emphasis should be against retail parks and light industrial estates. Suffolk should exceed as being a county with its own highly successful tech cluster county-wide. With developments of a film studio at Bentwaters in the pipework, Suffolk can soon become the Suffolk Powerhouse it should be.</p>	The opinions concerning local democracy are noted but beyond the Local Plan remit. The Borough will continue to work on a range of transport related and Highway improvement initiatives in conjunction with the County Council with the aim of delivering a transport and road network capable of complementing the town's anticipated development. Delivery of science parks and other forms of development to create a vibrant and successful local economy will be dependent on the success of local infrastructure delivery and is allowed for by policies for employment areas and the education quarter.	252 57
	Private individual	Stop reducing light to existing residents by doing away with high-rise. Sunlight helps all.	Comment noted, however, some higher density development must be expected within the borough boundaries if its government-led targets are to be achieved.	255 33
	Private individual	In 2036 I would like Ipswich to have celebrated several years of the roads being cycle safe with designated lanes separated from electric vehicles, primarily public transport and essential services.	These aims are at the heart of several infrastructure projects that will be proposed in conjunction with the Highways Authority.	255 30

	Private individual	Invest in the marina so it becomes a vibrant place to go for all ages; Far less congestion Invest in the high street More focus on reducing crime, Ipswich feels far too unsafe after 6pm.	The Policy for the Central shopping area encourages uses which will bring more people to use the centre after the shops have closed and a night time economy policy has been added.	255 03
	Private individual	Link the Waterfront to the town centre. Improve the leisure offering in the town. Solve the inner ring road traffic Promote cycle routes.	The link between The Waterfront and the Town centre is a key element of the emerging Supplementary Planning Document - the Public Realm Strategy	255 21
	Private individual	Have a cycle track and footpath from Stowmarket to Ipswich waterfront.	The Council supports the provision and development of a cycle network for Ipswich. There is already off-street cycling provision along the river towards Stowmarket but at the current time this does not provide a complete link. The Council supports, in principle, the necessary changes to infrastructure to enable a complete link to be provided, but it should be noted that the Council has no control over planning matters outside of the Borough of Ipswich. The public footpath already exists.	255 31
	Private individual	Make Ipswich a place where people want to be. Areas of Ipswich are rundown with no community spirit, no local amenities or places to meet.	The Plan includes policies for the promotion of recreation and leisure. The Council will also try to improve community life as part of its Infrastructure Delivery.	255 00
	Private individual	Install posts next to the grass verges in roads in and out of the town centre to stop people parking and ruining the verge, it gives a poor impression to visitors.	Comments noted; however this would be the responsibility of the Highways Authority.	255 27

	<p>Q5: What is your vision for the Ipswich HMA and Ipswich FEA by 2036?</p>	<p>Ipswich Community Media</p>	<p>Address our desperate lack of suitable art spaces:</p> <p>Studio spaces - art centre - grass roots - run by all the community.</p> <p>Prosperous arts / creative scene - that brings tourists to the town - use of old buildings, supporting growth through hope, creativity and skills.</p> <p>Culture leads development - has been hugely successful in many other centres around the UK.</p> <p>Nourishing and enriching environment - green areas supported and developed.</p> <p>Everyone has access/has a say - routes to securing a balanced wellbeing spaces and centres (town centre hub).</p> <p>Affordable housing - immediately needed.</p> <p>Empty premises being used as homeless or affordable living.</p> <p>Empty spaces adopting the Camelot scheme - like other cities and towns - where people become effective landlords for empty spaces.</p>	<p>The Council continues to support the Arts as a cultural community focus and will explore further delivery as opportunities arise during the development plan process. The delivery of affordable homes remains a priority for the Local Plan process.</p>	<p>254 63</p>
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		Suffolk County Council SCC	The County Council has endorsed the New Anglia New Economic Strategy and will work with partners (including Ipswich Borough Council) to implement the strategy. The County Council is also a partner in delivering the Ipswich Vision, so is committed to enhancing the role of Ipswich Town Centre as retail and service centre for the whole county.	Comments noted and welcomed. Both documents are referenced in the plan.	254 46
		Suffolk Constabulary	Designing Out Crime standards to be compulsory for all new developments and redevelopments, at the earliest opportunity and in any sector. Action taken to protect/enhance public open spaces such as parks and churchyards to deter criminal/anti-social behaviour. Action taken to prevent buildings being out of use for extended periods (i.e. former pubs/shops etc)	Secured by Design is an important method of creating safe places to live work and enjoy recreation. The Council will continue to promote the enhancement of its local communities with physical and other improvements whenever its powers allow. The measures anticipated are not all capable of being controlled by land use policies.	248 43
		Private individual	My vision: Streets for People. (Ipswich is currently a thoroughfare and massive car park for road vehicles.)	Concern noted. The Council is currently working with Suffolk County Council to prepare the Local Transport Plan for the region.	247 18
		Private individual	The plan is looking to "matches the aspiration of all households". Any plan must include a mix of housing. So that when younger members of the community have outgrown their starter home and	The Council seeks an appropriate mix of homes within its policies; however, the system is market-led and the constraints of the market means that developers are best placed to determine the mix of housing which they wish to build.	247 44

			wish to aspire to move to bigger and more expensive property - it can be available in Ipswich. Building just small starter and social housing will not create a mixed community just one that only meets some needs and will restrict Ipswich's future potential.		
		Private individual	A vibrant and buzzing town centre and greater transparency on development of key areas such as the Island site and undeveloped areas in the Waterfront. A better followed up local plan so that proposals for land use come to fruition much earlier than has been the case with previous local plans which promised much but either failed to do so, or have been delivered in piecemeal fashion.	Comments noted. Development has now resumed at the Waterfront and the "Island site" remains a proposal in the Plan.	247 68
		Pigeon Investment Management Ltd	The employment and retail offer of the town will have grown supported by housing growth at a level to meet the objectively assessed need and of housing types that meet local needs and the development of which is not constrained by administrative boundaries.	The key elements of this view are being sought through the Local Plan policies and cross border working secured by the duty to cooperate.	253 59
		Ipswich Limited	The boundary of Ipswich needs to be expanded as a matter of urgency. This Greater Ipswich needs two MPs, should be a unitary authority. The Ipswich Central BID needs to be abolished.	Please see above - Concerning the political commentary, the planning system is incapable of influencing local democratic issues which are within the remit of the Boundary Commission.	254 02

			<p>Infrastructure needs to be an urgent priority. A dual carriageway Northern Bypass, rail network expansion and Copdock Interchange junction upgrades as a minimum. Park & Ride needs to be revisited understanding the concept requires subsidy rather than being self-sustainable.</p>		
<p>How much growth?</p>	<p>Q6: and 6a: Which growth scenario should we plan for across the Ipswich Housing Market Area?</p>	<p>Mersea Homes</p>	<p>Publication of the Government's "Planning for the right homes in the right places" consultation proposals post-dates publication of the Ipswich consultation. Whilst the CLG standard methodology indicates that Ipswich's own OAN number might fall, all three adjoining authorities' numbers increase. The need for a joint planning approach demonstrates the complexity of demographic, economic and housing interactions across administrative boundaries, and in light of the CLG consultation, we wish to reserve the right to comment on detail about the growth scenarios. That said, Ipswich has been underachieving and under delivering in respect of housing supply and we fully support the ambition expressed in the Norfolk and Suffolk Devolution agreement to substantially increase housing supply, and on that basis, would support Scenario C - High Increase in Growth pending further clarity on the government's consultation.</p>	<p>Support for the higher growth scenario and other comments and concerns noted. The standard methodology for assessing housing need has been established through the NPPF and this sees the housing figures rise for Ipswich Housing Market Area.</p>	<p>254 81</p>

		<p>On Behalf of Kesgrave Covenant</p> <p>We concur with the approach taken in the Issues and Options document of only consulting on levels of growth that at least meet the full Objectively Assessed Need (OAN), as there is no basis for delivering less than the full OAN.</p> <p>We note that under the draft standard methodology recently published by DCLG, the combined total for Ipswich and Suffolk Coastal is broadly similar to the level of OAN being consulted upon, which suggests that an OAN in the order of 21,000 new homes for the joint area is appropriate.</p>	<p>Please see comment above. The standard method results in housing need for Ipswich and Suffolk Coastal of just over 19,000 homes over 18 years</p>	<p>248 58</p>
		<p>On Behalf of AqiGen</p> <p>As a landowner and investor in the Ipswich area and wider sub-region, AqiGen is supportive of the ambitious growth scenarios identified in the consultation document. AqiGen does not have a specific view at this stage on the growth scenario that should be adopted. Instead, given the nature of their land interest, their focus is on the actual implications for site allocation decisions.</p>	<p>Comment Noted</p>	<p>250 98</p>
		<p>Northern Fringe Protection Group NFPG</p> <p>None of these, as they take no account of BREXIT and of the Government's most recent Housing White Paper. A more realistic growth scenario based on the Government's White paper target and the Experian jobs target should</p>	<p>For the Council's Local Plan work to found "sound" it will need to be guided by the Government's Planning Policy Guidance and the National Planning Policy Framework which has now established the standard method for calculating objectively assessed housing need.</p>	<p>249 58</p>

			be adopted, which we note is far higher than historic trends. We have a number of concerns with the underlying evidence basis for this section in relation to the OAN for the Ipswich Housing Market Area (HMA) and individual local planning authorities which has been assessed through a SHMA report, May 2017. [Please see full comment for more detail].		
		Save our Country Spaces SOCS	None of these, as they take no account of BREXIT and of the Government's most recent Housing White Paper. A more realistic growth scenario based on the Government's White paper target and the Experian jobs target should be adopted, which we note is far higher than historic trends. We have a number of concerns with the underlying evidence basis for this section in relation to the OAN for the Ipswich Housing Market Area (HMA) and individual local planning authorities which have been assessed through a SHMA report, May 2017. [Please see full comment for more detail].	ditto	250 69
		Greenways Countryside Project	Scenario A, the lowest growth option is the most appropriate for this area, due to the limited infrastructure and important natural environment.	The standard method now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	253 41
		Suffolk Preservation Society	SPS believes that the Baseline, Scenario A should be planned for. We believe that to aim for greater	The standard method now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	246 97

			economic growth would require a substantial increase in the level of housing that would be undeliverable given the identified constraints on available housing land.		
		Babergh Mid Suffolk	<p>Over recent years Babergh and Mid Suffolk areas have not met their respective levels of housing need due to issues of market strength and scheme deliverability. The future plans would need to ensure that the deliverability of spatial options is robustly tested to demonstrate capability to meet the level of need within the HMA. In this regard it should be noted the diagram set out on pg.27 has not been subject to consideration of constraints and deliverability at this stage.</p> <p>We support the review of employment sites within Ipswich. The outcome of this assessment will be critical to informing options on development capacity within Borough.</p>	Comments noted. Under the continuing process of consultation and the duty to cooperate the SHEELA should clarify these issues and the plan is subject to whole plan viability testing.	253 99
		East Suffolk Travellers Association	We consider that Scenario B, the Medium Growth Forecast, is a realistic one. Ipswich is one of the key centres of population and employment in East Anglia, improved rail services to London, Cambridge and Norwich are planned while land and housing costs are relatively low for South	Support for the Medium growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	248 06

			East England. The town is therefore ideally placed to attract jobs and housing demand.		
		Ipswich Wildlife Group IWG	The important natural environment and the limited infrastructure of this area suggest that Scenario A with low growth, is the most suitable option.	Support for Lower growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	248 20
		Private individual	Growth scenario A baseline looks more achievable and indeed deliverable, particularly in the light of constraints acting to protect sensitive locations and changes coming out of the UK's exit from the European Union. Changes in energy production as well as the energy market itself may act against a new nuclear power station at Sizewell. Taking Sizewell out of the equation would have some impact on growth scenarios B and C. In any event growth scenario C is over ambitious and probably unrealistic.	Support for Lower growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	247 69
		Railfuture East Anglia	Scenario B the Medium growth forecast. Ipswich is one of the key centres of population and employment in East Anglia. Improved rail links to London and Cambridge are planned during the plan period and currently, land and housing costs are relatively low for South East England. Ipswich is therefore ideally placed to attract jobs and housing demand.	Support for the Medium growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	250 08

		Home Builders Federation HBF	The eventual level of housing need to be considered by the authorities in the HMA will also dictate the development strategy adopted. As a minimum, the Councils should prepare strategies on the basis of 'Scenario B'. This is a positive approach towards housing delivery and economic growth that could be supported by the HBF. The Councils should also consider 'Scenario C'. In taking forward such an approach, with large scale strategic allocations, Councils will need to be clear about the timescales required to deliver this level of growth, and support smaller sites for quicker delivery within the first ten years.	Comments concerning Medium growth noted and the need to test the possibility of achieving the higher growth rate is accepted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	250 24
		Gladman Developments	It is likely that the Local Plans will need to plan for additional growth beyond that identified in the most recent SHMA to ensure that the economic development ambitions of the area can be achieved through positive plan making. The need to proactively enable sustainable economic growth should be at the forefront of any decision making regarding the future growth scenario.	The wish to see the development of a strategy relating the growth of new homes to similar levels of industrial and commercial development is noted. However, the Council has a duty to respond to NPPF requirements which places an objective assessment of need at the front of the process governing the delivery of new homes.	251 10

		Ashfield Land Limited	It is not considered appropriate to plan for the 'baseline' scenario (A). If this scenario was to be progressed, the Local Plan is likely to inhibit future growth across the HMA. Subject to further background work, the level of growth proposed in the 'high increase in growth' scenario (C) would be most appropriate to ensure the required levels of housing and economic growth over the plan period. The 'medium increase in growth' scenario (B) should, however, be seen as an absolute minimum. Any growth scenario must also take account of the substantial need for affordable housing across the HMA. A further reasonable uplift (beyond the economic uplift) should be allowed for to meet the identified need for affordable housing.	Support for the higher growth scenario noted	250 38
		Environment Agency	Options 4 and 6 propose Framlingham as a location for 6% and 5% of housing respectively. The sewage treatment works is over capacity already, so it is important to note that further capacity will be required to support growth. The Sustainability Appraisal Scoping Report identifies the need to invest in sewage treatment capacity with regard to an increase in population. The Shared Evidence Base section and SA Scoping Report refer to a water cycle study, and the issue of available foul water treatment capacity should help inform the	The Council is required to provide a complete evidence upon which to confirm the deliverability for its major proposals and the EAs comments are noted and welcomed. The Plan will be informed by the Strategic Flood Risk Assessment.	251 76

			<p>location and timing of development.</p> <p>When deciding where to locate growth, flood risk is an essential consideration. The SFRA must be used as an evidence base to ensure that development is sequentially sited in areas with the lowest probability of flooding as defined by the Planning Practice Guidance.</p>		
		On Behalf of Bloor Homes	<p>If the Council were to pursue Scenario A, there is a substantial risk that the Local Plan would become almost immediately out of date and would fail to meet development needs in full. It is suggested that the Local Plan should adopt the approach as per Scenario B, as a minimum. If the Council wish to maximise the plan's social and economic benefits, and the potential for infrastructure improvements, a scenario closer to C should be pursued. It is submitted that the Council should seek to identify potential sites that could deliver the higher growth scenario. Growth should be focussed where the economic and social benefits will be maximised;</p>	<p>The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.</p>	252 21
		Pigeon Investment Management Ltd	<p>With the progress towards Norfolk and Suffolk devolution Scenario C High Increase in Growth is preferred. This will deliver housing that will contribute to funding infrastructure that the area needs, it</p>	<p>Support for the higher growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.</p>	253 60

			will deliver affordable housing and will deliver economic growth.		
		Ipswich Community Media CIC	<p>Culture leads development - has been hugely successful in many other centres around the UK</p> <p>All included</p> <p>Nourishing and enriching environment</p> <p>Everyone has access/has a say</p> <p>Affordable housing</p>	Comments noted - however, please see responses above concerning the need to accept the standard methodology set out in the NPPF.	252 47
		Conservative Group	We do not believe it to be prudent during these uncertain political and economic times to plan for anything other than growth scenario A. Brexit on the horizon could bring many changes to housing needs especially due to immigration factors, so we believe a more cautious approach is needed now with the potential to look at this again when the future looks more stable.	Comments noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	252 82

		<p>NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)</p>	<p>NHS England note the requirement for Ipswich Borough Council to deliver a plan for increased levels of housing growth for their area, resulting in approximately 11,420 new dwellings during the plan period 2014 - 2036, and for Suffolk Coastal to deliver 10,111 dwellings during this same plan period. This represents an additional 3,131 dwellings in Ipswich and 1,645 dwellings in Suffolk Coastal to that proposed within the adopted Local Plans, for which, at this time, no location has been identified. It is also noted that this forms part of the wider plan for the Ipswich HMA to deliver a total of 39,302 dwellings.</p> <p>during plan period 2014 - 2036. The impact on primary care services and infrastructure arising from this level of growth will be significant.</p>	<p>Concerns noted. The Council welcomes ongoing discussion with NHS England and representatives of the CCG locally to ensure that appropriate funding can be sought from both Government and the developers to ensure the Health Infrastructure for the area does not become a victim of development success.</p>	<p>249 01</p>
	<p>Q7: Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or</p>	<p>Ipswich Community Media</p>	<p>Understanding the jobs and skills market - so that we can adopt new approaches of inspiring youth and generating aspiration, so that they may adopt passions and interests.</p> <p>We have been very successful in the past with using volunteering as a source to develop skills that lead to jobs. Support small organisations to be able to really give worthwhile time and meaningful INTERESTING opportunities to young people -</p>	<p>Comments noted and understood but relevant to other sections of the council and other activities such as apprenticeships.</p>	<p>254 64</p>

	scenarios outlined above – either higher or lower?		make them care about the town centre - youth clubs, arts centres and creativity right through the heart of this town.		
	On Behalf of AqiuGen	It is noted that Ipswich itself has had the lowest increase in jobs compared with the wider Ipswich FEA. The economic targets for the area are also based on significant economic development opportunities that are located outside of the Ipswich urban area. Whilst there is always an opportunity for spin-off investment and job creation, any economic strategy and resultant land requirement needs to be based on realistic targets to avoid an excessive allocation of employment land which could otherwise be used for alternative land use requirements and demand.	The Council has sought its local plan allocations with a similar degree of pragmatism as that suggested in this submission. The employment targets are set in conjunction with partners and will become the subject of examination if challenged further. Existing employment land has been reviewed.		
	Northern Fringe Protection Group NFPG	<p>Housing Target: Yes. As the Government's White Paper clearly shows, the OAN for Ipswich Borough is too high and should be revised downwards.</p> <p>Jobs Target: Yes. The EEFM forecast is clearly not "trend-based" and it is extremely misleading to imply that it is. It is too high as evidenced by the Experian figure in the Ipswich SHMA report, which should be used for Ipswich Borough.</p>	Despite best endeavours, the Council has faced a continued shortfall in housing delivery since the completion of the 2011 Plan. In order to be found sound the revised Local Plan must now address both the five-year land supply issue and the ongoing assessed need for the Borough. The methodology is set out in Government guidance in the National Planning Policy Framework and the Council will need to take any revisions to the NPPF into account. Comments concerning the EEFM forecast are noted.	249	59

			<p>This is still far higher than historic trends.</p> <p>We have a number of concerns with the underlying evidence basis for this section. [Please refer to full comments for more detail].</p>		
		Save our Country Spaces SOCS	<p>Housing Target: Yes. As the Government's White Paper clearly shows, the OAN for Ipswich Borough is too high and should be revised downwards.</p> <p>Jobs Target: Yes. The EEFM forecast is clearly not "trend-based" and it is extremely misleading to imply that it is. It is too high as evidenced by the Experian figure in the Ipswich SHMA report, which should be used for Ipswich Borough. This is still far higher than historic trends.</p> <p>We have a number of concerns with the underlying evidence basis for this section. [Please refer to full comments for more detail].</p>	Please see comments above.	250 68
		Suffolk Chamber of Commerce	<p>We note the jobs target and query whether it's realistic when viewed in the context of the current total stock of jobs in Ipswich and the potential constraints that exist on the future supply of labour/skills.</p> <p>Given the extent to which the delivery of the Plan is predicated on</p>	The Council would face objections if it did not set challenging targets for employment growth. In the light of the local talent being produced by our colleges and University the Council will try to encourage the delivery of employment land and promote its use in the manner indicated in the submission.	251 61

		<p>employment growth it will be essential for the Council and other public partners to work closely and supportively with businesses. Likewise it will be essential for the Council to work collaboratively with Suffolk County Council, FE and HE providers to ensure the local delivery of appropriate education/skills for growth.</p> <p>Although outside the remit there should be associated initiatives to market Ipswich to businesses who can bring the required labour and skills into the town.</p>		
	Home Builders Federation HBF	<p>Whilst we welcome the collaboration between Ipswich and Suffolk Coastal, the level of housing needs identified through the SHMA is insufficient and should have taken more account of market signals. Canterbury has similar market signals to the Ipswich HMA and the Inspector considered a 20% uplift to be appropriate there. "Planning for the right homes in the right places" now provides a clearer direction as to how market signals should be taken into account. For Ipswich HMA it suggests that insufficient weight has been given to market signals, and the proposed uplifts should be increased where affordability is worst.</p>	The Council will take account of market signals and utilise the approved methodology which may be in force at the time of publication.	250 19

		Gladman Developments	The scale of new growth required to shape the future of the area will require the consideration of a range of different delivery options, including those across local authority boundaries. It is noted that a new economic strategy is due to be published by the New Anglia Local Enterprise Partnership in October 2017. It is important that the ambitions of the LEP are reflected within the local plans that are prepared in the area and that the implementation of this important strategy is carefully considered through the duty to cooperate and integrated within Local Plans in their final form.	Comments noted. The Council will continue to work with its neighbours to deliver appropriate growth to meet the needs of the HMA.	253 85
	Q8: Would communities be prepared to accept more growth if that growth meant that significant new or enhanced infrastructure could be provided?	On Behalf of Kesgrave Covenant	<p>Yes, communities may be prepared to accept more growth if that led to infrastructure enhancements, but as per the comment above, there would need to be clarity as to what additional infrastructure could be provided, and what the benefits of that would be to existing residents.</p> <p>At the moment, Scenario C is presented only as a hypothetical scenario, without firm practical examples or clear links between additional infrastructure items and additional homes, and so is less likely to receive support.</p>	Comments noted - please see other responses above.	248 60

		Northern Fringe Protection Group NFPG	No. Communities will not accept higher growth targets until such improvements are delivered and are shown to be effective. There are already sizeable new housing developments planned in and around Ipswich. Higher targets should not be set until there is robust evidence that infrastructure can cope with the current planned expansion. E.g. there is major concern on how the road network will cope with the Ipswich Garden Suburb development and the impacts of this need to be monitored and appraised as it is built out before setting higher targets. There are also concerns over sewage and freshwater infrastructure.	Comments and concerns noted. The Council will be expected to justify its infrastructure needs and the timing of delivery in order to have the Local Plan found sound.	249 60
		Save our Country Spaces SOCS	No. Communities will not accept higher growth targets until such improvements are delivered and are shown to be effective. There are already sizeable new housing developments planned in and around Ipswich. Higher targets should not be set until there is robust evidence that infrastructure can cope with the current planned expansion. E.g. there is major concern on how the road network will cope with the Ipswich Garden Suburb development and the impacts of this need to be monitored and appraised as it is built out before setting higher targets. There are also concerns over sewage and fresh water infrastructure.	Please see above	250 67

		Private individual	Yes, although having only lived in Ipswich for 6 years, the development to the north of the town seems to be limited. Ipswich is very wide in comparison to other towns. This does not help in making the whole town accessible. Go north, put the infrastructure in and build the northern route.	The required provision of infrastructure for the Ipswich Garden Suburb will be set out in the Council's Supplementary Planning Document. Although roads and other infrastructure are required these do not extend to the delivery of a Northern Distributor.	247 87
		East Suffolk Travellers Association	Communities are more likely to accept significant new growth if it means that significant new infrastructure will also be provided. In fact, pressure for growth will be inevitable. By planning for growth and identifying the infrastructure that this requires, the local authority is in a stronger position to bid for infrastructure funding from central government. The document accepts that capacity on local rail lines is already an issue. Further development can and should lead to improvements in infrastructure.	The Council continues to work with its partners to ensure the timely delivery of infrastructure improvements through the Plan period.	248 07
		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	As stated above the exact nature and scale of mitigation required to meet augmented needs of proposed developments will be calculated at an appropriate time, as and when schemes come forward over the plan period to realise the objectives of the LP. Comments on the growth scenarios and options set out in the LPR are	Comments noted. Further discussions are scheduled as part of pre-submission consultation work.	249 03

			<p>shown below:</p> <p>We would suggest that one of the key priorities of this document should be ensuring sustainable primary care provision for communities both existing and proposed.</p> <p>NHS England and the CCG would welcome further discussions with the Local Authorities with regard to density of development and cumulative growth over the plan period within specific areas, to understand the impact and how this may be mitigated.</p>		
		Private individual	There is certainly a need for greater economic growth across the Ipswich HMA. Careful intelligent planning of new infrastructures could permit growth that would fulfil social goals and mitigate damage to the environment.	Comments noted	247 19
		Private individual	Not necessarily	There was no further commentary supporting this statement. Comment noted	247 46
		Private individual	It would depend on the type of infrastructure offered as an incentive to the community. If landowners wish to realise the value of their land for housing development, they need to bear in mind the wishes of the community and what benefits can be provided to that community under the current development model. In other words the land should be made available to	Comments noted	247 70

			developers at a fair and reasonable price that ensures the delivery of planning gain to the community that 'suffers' the impact arising out of new development in their area.		
		Railfuture East Anglia	Growth pressure will be inevitable whether people are willing for it to happen or not. By planning for growth and identifying the infrastructure it requires places the local authority in a stronger position when it comes to bidding for infrastructure projects from central government.	Comment noted	250 09
		Ipswich Limited	Not at all. No one wants new homes, commercial property, power stations, roads or incinerators built near them. This quirk is also evident in those living in new builds, not just property that is well established or those who have lived in the area for generations.	Comments noted	254 03
		Conservative Group	Invariably communities are resistant to new development for obvious reasons, but this can be, and must be, mitigated by enhanced infrastructure. Too often we see developments being granted planning permission without the proper infrastructure in place which leads to increased objections from the residents. This is currently happening with several community groups complaining about lack of sufficient roads, drainage and	The Council will publish an Infrastructure delivery programme and a s123 statement on its infrastructure need in conjunction with its partner organisations.	252 83

			sewers within the Ipswich Garden Suburb development.		
	Q9: What key pieces of transport infrastructure should be sought? Would it be roads such as an Ipswich northern route, or sustainable transport infrastructure (public transport, park and ride, cycling), or both?	Northern Fringe Protection Group NFPG	All of these need to be provided to meet the current Local Plan targets. It is critical for Ipswich that the Local Plan Review seeks to address the severe congestion in the local road network that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough is a must-have. A full cross-boundary Transport Assessment for the draft Local Plans is required to determine what additional transport infrastructure is required and where and when. If it cannot be provided then higher targets cannot be set, as it would be unsustainable to do so.	Please see comments above, the Plan will have infrastructure needs that are justified by traffic modelling undertaken by Highways Department officers from Suffolk County Council.	249 61
		Save our Country Spaces SOCS	All of these need to be provided to meet the current Local Plan targets. It is critical for Ipswich that the Local Plan Review seeks to address the severe congestion in the local road network that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough is a must-have. A full cross-boundary Transport Assessment for the draft Local Plans is required to determine what additional transport infrastructure is required and where and when. If it cannot be provided then higher	Please see comments above.	250 66

			targets cannot be set, as it would be unsustainable to do so.		
		East Suffolk Travellers Association	Improvements are needed to the local rail network. Atkins, consultants to East/West Rail, are putting the case for an increase in train service frequency into Ipswich from Bury St Edmunds and Felixstowe. This will require additional platform capacity at Ipswich and double tracking the Felixstowe line. The proposed Ipswich Garden Village should benefit from a relocated Westerfield station served by more trains than at present. East Suffolk Line capacity should be enhanced to enable half-hourly services to Woodbridge and Saxmundham, and provide Woodbridge with a more attractive service into Ipswich. Ideally, the entire section from Woodbridge to Saxmundham should be re-doubled.	The Council is a member of the East-West Rail Consortium and supports the East-West Rail project. The Council also supports enhancements of other rail services to/from Ipswich. The idea of relocating Westerfield station has been considered previously but the substantial cost of doing this makes it difficult to justify and find appropriate funding.	248 08
		Private individual	Both	Noted	246 53

		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	We would support a policy to ensure sustainable transport infrastructure linking new and existing communities.	Support for sustainable transport initiatives welcomed	249 04
		Private individual	Both types of transport infrastructure should be sought: sustainable transport structures in the short term; the northern route as soon as possible.	Noted	247 39
		Private individual	<p>Yes to Northern Bypass. Needed because the Orwell Bridge is just not up to the job with no sensible diversion routes.</p> <p>But avoiding problem currently with A14 which effectively makes Ipswich a walled town from the south.</p> <p>Access to waterfront needs something exciting. An inner circular trolley bus connecting station, shops and waterfront might be not that expensive an option.</p>	Noted	247 47
		Railfuture East Anglia	Improvements to the local rail network. Atkins consultants for 'East-West Rail' are advancing the case for increases in the frequency of rail services into Ipswich from Bury St. Edmunds and Felixstowe but this will require additional	The Council is a member of the East-West Rail Consortium and supports the East-West Rail project. The Council also supports enhancements of other rail services to/from Ipswich. The idea of relocating Westerfield station has been considered previously but the substantial cost of doing this makes it difficult to justify and find appropriate funding.	250 10

			platform capacity at Ipswich and double tracking the Felixstowe line. Ipswich Garden Suburb should benefit from a relocated station at Westerfield to provide sustainable transport links to the rest of the network. The East Suffolk line should be double track as far as Saxmundham (currently only as far as Woodbridge). This would enable the services to run every half hour to Woodbridge and Saxmundham and provide Woodbridge with a more attractive service into Ipswich.		
		Ipswich Limited	<p>There should be an in-line platform rail station in South East Ipswich where traffic is a major concern especially around rush hour. (An additional rail spur (north) to near Adastral Park would also be sensible. It won't be cheap but if we don't endeavour for it the money will go elsewhere.</p> <p>A full dual carriageway Northern Bypass goes without saying, however, a "northern route" or "relief road" is inadequate. There must be the understanding that Felixstowe HGV traffic should not be going through the Ipswich road network at all, especially near to residential areas, hence the Upper Orwell Crossings isn't suitable.</p>	Comments noted	254 04

		Conservative Group	The Conservative group are in favour of a Northern Route for Ipswich as well as significant upgrades to the Copdock interchange. Whilst we maintain a focus on sustainable public transport more must be done for the car driver who has been virtually ignored over the past few years. It cannot be ignored that despite environmental concerns car driving is more popular than it ever has been and journeys, especially those under 3 miles are increasing - these matters must be addressed rather than ignored.	Comments noted. It is intended that the Ipswich Parking Strategy will address parking demand issues in the town centre and the Council is currently working on this in conjunction with SCC. SCC are the Highway Authority and take primary responsibility for strategic transport planning.	252 84
Q10: Should the Local Plan Review seek to address the issue of temporary closure of the Orwell Bridge by planning for a scale of development that can help to deliver infrastructure?	Northern Fringe Protection Group NFPG	Yes, but this question misses the point of addressing the current levels of congestion, which will only increase under the current Local Plan proposals. It is critical for Ipswich that the Local Plan Review addresses the current severe congestion in the local road network, especially through Ipswich, that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough will help ease congestion.	The Council continues to work with its partners to ensure the timely delivery of infrastructure improvements through the Plan period. This will include road improvements agreed with the Highway Authority to offset and mitigate the effects of development. The Council has also introduced an air quality management policy to ensure that pollution does not exceed the expected standards. The Suffolk County Council is currently considering the introduction of a roadworks permit system.	249 62	
	Save our Country Spaces SOCS	Yes, but this question misses the point of addressing the current levels of congestion, which will only increase under the current Local Plan proposals. It is critical for Ipswich that the Local Plan Review addresses the current severe congestion in the local road	Please see comments above	250 65	

			network, especially through Ipswich, that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough will help ease congestion.		
		Private individual	No, the closures of the Orwell Bridge is a bit of a red herring as this only happens on the odd-occasion. Instead Suffolk C.C. should ensure that buses actually go where people want. For example, buses in east Ipswich are all filtered up to Tower Ramparts rather than a split between there and the train station - encouraging people to use their cars and increasing traffic and pollutants.	Comments noted. Whilst some bus services are linked to the railway station it is acknowledged that many are not. However, most bus services in Ipswich are operated on a commercial basis meaning that the bus operators themselves, rather than local authorities, determine the routing.	246 54
		Private individual	In some respects, the answer is yes; if the local plan can bring about a mechanism and indeed help resolve the ongoing problems caused to Ipswich residents and road users by the closure of the Orwell Bridge, then by all means it should do so. The local plan could aid the unlocking of the Island site for redevelopment and generate cash for the delivery of the proposed Upper Orwell Crossing, plus contributions from the landowner, ABP Ports, which would clearly benefit from such redevelopment.	Comments noted.	247 71
		Ipswich Limited	No. The Orwell Bridge is a bottleneck. Assuming no problems with nearby trunk roads the Ipswich	Comment noted.	254 05

			road network is largely inadequate for the number of vehicles using it.		
		Conservative Group	IBC should explore every possible avenue in partnership with other agencies to address the issues caused by closures of the Orwell Bridge.	Comment noted.	252 85
	Q11: Do you agree that providing a high growth scenario would help to deliver the affordable housing required?	Mersea Homes	It is our view that a higher growth scenario would support achieving improved affordability both through the direct supply of homes to the market, but also by increasing the proportion of affordable housing being delivered.	Affordable Housing delivery will continue to be an important priority for the Council. Achieving a high proportion of new affordable homes will depend on the viability of schemes and the developer's willingness to address this important element of the Plan.	254 82
		On Behalf of Kesgrave Covenant	<p>Yes, in the absence of any alternative delivery model, the level of affordable housing delivery is substantially linked to the quantum of housing growth. Since the OAN in isolation is unlikely to deliver sufficient affordable housing, there is definitely merit in an affordable housing 'uplift' to the OAN figure to increase affordable delivery.</p> <p>However, affordable housing delivery is not only a factor of the overall quantum of new homes, but the type of sites allocated for new housing - subject to other infrastructure requirements, new strategic allocations are better placed to deliver a higher proportion of affordable housing than existing small-scale urban opportunities, as evidenced by the higher proportion</p>	The Council, in cooperation with its partners, will seek an appropriate distribution of new homes within the Housing Market Area. To assess the need the Council has revisited the emerging guidance on delivery contained in the Draft National Planning Policy Framework. The duty to cooperate will mean that agreement should be achieved concerning the number of homes to be delivered by the Councils within the Strategic Housing Market Area.	248 59

			of affordable housing being sought at the Ipswich Garden Suburb. The Council may wish to consider adopting a two-tier approach to affordable housing, with a lower delivery rate on smaller sites, and a higher rate on strategic sites.		
		Suffolk County Council SCC	Both councils are right to highlight the potential for more homes being planned to provide a greater number of affordable homes and that these would be likely to serve the needs of Ipswich. However, the cost of the necessary infrastructure will need to be integrated further if such an approach were to be followed.	Comments noted.	254 59
		Northern Fringe Protection Group NFPG	No. Ipswich Borough cannot meet its current OAN target. Any increase in homes targets would clearly not deliver any more affordable housing in the Borough due to land constraints. We support IBC building affordable housing on its own land but as it already plans to do this, increasing the homes target will have no effect on numbers delivered. Affordable housing will only be provided in Ipswich Borough by commercial developers if it is viable to do so. Increasing the Ipswich OAN will not result in increased affordable housing outside the Borough as IBC would	Concern noted. Please see comments above.	249 63

			have little say in planning applications.		
		Save our Country Spaces SOCS	No. Ipswich Borough cannot meet its current OAN target. Any increase in homes targets would clearly not deliver any more affordable housing in the Borough due to land constraints. We support IBC building affordable housing on its own land but as it already plans to do this, increasing the homes target will have no effect on numbers delivered. Affordable housing will only be provided in Ipswich Borough by commercial developers if it is viable to do so. Increasing the Ipswich OAN will not result in increased affordable housing outside the Borough as IBC would have little say in planning applications.	Please see comments above.	250 64
		Private individual	It's unlikely a high growth scenario will alone deliver affordable housing. It is, arguably, quite apparent that the private sector development model as used by the volume house builders is simply unable to bring about delivery of affordable housing. Greater emphasis should be given to local authorities to plan and deliver affordable housing needs.	This perspective is noted; however, Local Plan policy will still promote the inclusion of an element of affordable housing (AH) in the mix of tenures. This should not be to the detriment of a scheme's viability provided that it is properly anticipated, and land values are set with the responsibility to deliver AH in mind.	247 72

		Gladman Developments	The Local Plan should seek to ensure that the objectively assessed needs for market and affordable housing are met in full. Where necessary, the Council will need to ensure that its evidence base is up to date to ensure that this can be achieved. This will also include the need to test a range of policy options through the sustainability appraisal process to determine the most appropriate strategy to pursue with regards to housing mix, affordability, affordable housing and the density of development.	Noted - please see comment above.	253 89
		Ashfield Land Limited	As set out above, the PPG supports an increase in the total housing provision included in a local plan where it could help deliver the required number of affordable homes. By adopting a more ambitious growth scenario, such as Scenario C, there is more chance that the Local Plan Review will deliver the required level of affordable housing over the plan period.	The Council welcomes the prospect of affordable homes being delivered but recognises that the amount of housing in the plan area will be determined in conjunction with the partner authorities.	250 39
		On Behalf of Bloor Homes	It is agreed that a high growth scenario would help to deliver the required levels of affordable housing, as the primary mechanism for the delivery of affordable housing is highly likely to be through mixed tenure developments incorporating market housing. In order to ensure that affordable housing is directed to areas of greatest need, additional	The Council will continue to work in conjunction with its adjoining partner councils to agree delivery of any future development in and around the boundaries of the borough. Comment noted.	252 22

			growth should be focussed in areas in proximity to Ipswich, including areas which may not be within the administrative area of the Borough but which still have a strong functional relationship with Ipswich.		
		Pigeon Investment Management Ltd	Allocating and delivering more housing sites will lead to higher levels of affordable housing provision as affordable housing is provided as a percentage of any development. Many larger brownfield sites that are existing employment sites will have high remediation costs that will reduce the amount of affordable housing that is deliverable.	Comment noted; however the Council will maintain its effort to obtain grant aid funding to enhance the opportunity for providing AH on difficult redevelopment sites during the plan period.	253 61
	Q12: Are there alternative scenarios which should be considered ?	On Behalf of Kesgrave Covenant	<p>Following on from our answers above, a variant to Scenario B (which adjusts the OAN to reflect job growth), would be a scenario that adjusts the OAN to more fully meet the need for affordable housing delivery.</p> <p>Rather than Scenario C, which provides a generic and rather hypothetical infrastructure growth scenario, it would be helpful to provide some variants to Scenario C setting out specific infrastructure/growth packages e.g. a Northern By-Pass Growth Scenario showing what level of housing growth might be necessary to deliver this item of infrastructure, and what other social and physical</p>	Please see comments above.	248 61

			<p>infrastructure may needed to be provided alongside that growth to meet the requirements of the new homes that this would entail. We feel this would give more substantive information to enable more informed views on the implications and opportunities that the higher growth scenarios could present.</p>		
		Northern Fringe Protection Group NFPG	<p>Yes. A more realistic growth scenario based on the Government's White paper target and the Experian jobs target; although we note even this is double the historic trend.</p> <p>A scenario that takes account of BREXIT, including weaker sterling levels, should be assessed. We note that paragraph 5.38 of the SHMA states that a 10-year scenario was ruled out because of the low levels of international migration following the recession. However, this type of scenario is far more likely given BREXIT and the much weaker pound, which have slashed the attractiveness of the UK to EU workers.</p>	<p>Comment noted. The Council continues to plan for its growth in housing based on OAN to accord the Government's guidance.</p>	249 64

		Save our Country Spaces SOCS	Yes, a scenario that takes account of BREXIT, including weaker sterling levels, should be assessed. We note that paragraph 5.38 of the SHMA states that a 10 year scenario was ruled out because of the low levels of international migration following the recession. However, this type of scenario is far more likely given BREXIT and the much weaker pound, which have slashed the attractiveness of the UK to EU workers. Growth should go where it is sustainable. The Local Plan growth agenda is unsustainable. A clear and unequivocal determination of wider infrastructure needs, and funding to meet them, is needed.	See Above	250 63
		Private individual	Do we need to infill every spare bit of land with housing? No. There are so many empty buildings and half-built things in Ipswich and these should be looked at first.	The Council is keen to ensure that brownfield sites and those sites which faltered as a result of difficult market conditions are brought forward during the plan period.	255 06
Where should Growth go?	Q13: Which distribution options do you think would be most appropriate to take forward?	Mersea Homes	We consider it is imperative that Ipswich continues to focus on delivery of its current housing allocations, these are a finite resource, and the Council has no option but to look beyond its boundaries. The stalled delivery rates experienced over the last seven years demonstrate that relying predominantly upon town centre regeneration sites creates vulnerability to economic cycles and prevents a balanced housing	See comments above.	254 83

			supply. Instead, we support Option 2 whereby the emphasis is placed upon securing housing development within adjoining authorities. Allied to that, we support Option 5 which focuses growth around Ipswich and along the A14 corridor.		
		On Behalf of Kesgrave Covenant	<p>It is evident that Option 1 (intensification of urban development by raising densities) has already reached its practical maximum under the existing Local Plan.</p> <p>In respect of Options 2 and 3 (development beyond the Borough boundary), the evidence in respect of housing need compared to housing land availability, as tested through the recent Local Plan Examination, shows that this part of the strategy is not so much an option as a necessity, as it is inevitable that part of Ipswich's housing need will need to be met in adjoining areas. In respect of this part of the strategy, the relevant questions are not whether this is appropriate, but:</p> <p>(a) How much of Ipswich's housing need should be met outside of it's boundary, and</p> <p>(b) Where that need should be accommodated.</p>	Comments noted	248 62

			In respect of both questions posed above, the starting point must be to seek to meet as much of Ipswich's housing need either within or adjacent to the town as practically possible.		
		Northern Fringe Protection Group NFPG	In general, we believe the current approaches, contained within the existing Local Plans are most appropriate. Basing the Local Plans on the Government's White Paper Housing targets would allow these approaches to continue.	Comment Noted	249 65
		Suffolk Preservation Society	SPS considers that development should be concentrated within the town (Option 5) and an increase in density would be preferable to erosion of countryside edge locations or encroaching into adjoining districts. Failure to concentrate in large urban areas will mean more greenfield sites need to be released which will reduce the viability of regeneration of urban brownfield sites.	The aim to redevelop town centre sites remains a continuing priority for the Council. However, the tightly drawn boundaries for the town suggest that during the current plan period to 2036 some planned growth will be inevitable if the Council is to achieve the delivery of sufficient homes to meet the objectively assessed need and the government's expectation for new homes. In this context the Council believes that it must develop ideas with its partner councils under the duty to cooperate to achieve the best development possible around the edge of the town while maintaining commitment to the historic core of the town.	246 98
		Tuddenham St Martin Parish Council	The Parish Council considers Option 4 'Continuation of existing approach' the best solution.	Comment noted	249 23

		<p>Historic England HE</p> <p>From a historic environment perspective, it is hard to select the preferred option given the range and distribution of heritage assets throughout both the Borough and the district. Each option will have an impact on heritage assets, and it will depend to some extent on where site allocations are identified. We note in particular that in some options Saxmundham and Framlingham have been identified for significant growth. Owing to the concentration of heritage assets and topography, both settlements are sensitive to new development and significant levels of growth are likely to have notable impact on the historic environment.</p>	<p>Further comments awaited at preferred options stage when more detail becomes available.</p>	<p>248 97</p>
		<p>East Suffolk Travellers Association</p> <p>A blend of options 4 and 5. The key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Three obvious examples are Woodbridge, Felixstowe and Saxmundham. Leiston also has potential access to the rail network if the branch is again served by passenger trains. Framlingham is 6 miles from the nearest railhead by a secondary road and is thus less of a candidate for growth. Estate agents' websites show that "distance to nearest rail station" has overtaken "school catchment" as the most important consideration when choosing where to live.</p>	<p>Support for a hybrid of Options 4 and 5 for development at or near sustainable transport nodes noted.</p>	<p>248 10</p>

		Private individual	<p>I consider Option 4 is most suitable as it builds on existing attractive sustainable localities. Option 5 may also be feasible but will lead to Ipswich expanding into a large and possible unattractive large town. Option 6 is most undesirable - we have seen elsewhere what linear development leads to - I am surprised it has even been suggested.</p> <p>General comment - Why isn't Wickham Market included?</p>	Support for option 4 noted	246 79
		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	<p>Growth Scenarios described will all have a significant impact on the delivery of primary care services. The mitigation required from each of the scenarios will reflect the level of impact and the final identified locations for development growth. It is however important to remember that improved or newly created infrastructure, alone, will not fully mitigate the impact of development growth. Resource and revenue implications provide a very significant risk to the delivery of primary care services and we</p>	<p>The health commentary is welcomed and detailed comments helpful. NHSE and CCG representatives will be contacted further to ensure that the health objectives are considered properly in the production of the infrastructure delivery programme that will attend later iterations of the Local Plan.</p>	249 10

		<p>should continue to work together to identify ways in which sustainable health care services can be delivered and</p> <p>how development can contribute to healthy communities and the training and recruitment of health care professionals.</p> <p>See attachment for detailed comments on the various options.</p>		
	private individual	<p>Can I suggest that all three options for IBC stay on the table for further research and more specific consultation? I'd like to see the brown sites near the Waterfront developed (Option 1), but housing densities near the town centre should be kept low because there are not the transport facilities and infrastructures to cope with big increases in the population. Option 2 provides some opportunities, but my preferred option would be Option 3, as it would alleviate pressures on the town centre.</p>	Comments and preference for option 3 noted	247 20
	On behalf of FIS Property and Landex Limited	<p>We have considered the alternative growth delivery options in Part 1 (pages 24-26). We consider that a combination of Option 1 (higher density urban regeneration) and Option 3 (Changing use of existing land in the borough to housing) provide the most appropriate</p>	<p>The Council remains supportive of brownfield redevelopment and the wish to see increased densities in the core of the plan area and will continue to work with other agencies to achieve these objectives in support of the growth agenda.</p>	248 69

			housing growth delivery options. This will ensure that housing is provided in sustainable locations, regenerating areas that are in need of change and where development can enhance both the urban and living environment and make more efficient use of urban land.		
		West Suffolk	The Plan is sound. Options 4 and 5 place a high proportion of growth within the area East of Ipswich. It will be important to ensure that the highway requirements of cumulative developments (particularly those using the A14) are adequately addressed, to enable appropriate growth. West Suffolk supports initiatives that improve cross-County road and rail infrastructure.	West Suffolk comments noted	247 63
		Private individual	Option 5.	Support for Option 5 Noted	247 74
		Railfuture East Anglia	Of the options presented the best seems to be a blend of options 4&5. Key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Woodbridge, Felixstowe and Saxmundham are on the rail network whereas (for example) Framlingham is not. A study of estate agents web sites reveals that 'distance to nearest rail station' has overtaken school	Support for a hybrid of Options 4 and 5 for development at or near sustainable transport nodes noted.	250 13

			catchment as being the most important consideration when choosing where to live.		
		Gladman Developments	Gladman does not specifically favour any of the options that have been identified but would highlight the need to plan for significant growth in proximity to Ipswich in addition to making realistic assumptions regarding the delivery of new homes across Ipswich's important urban regeneration sites.	Comments noted	251 11
		Ashfield Land Limited	<p>A combination of the distribution options suggested will be required. There must, however, be recognition that increased development beyond the Ipswich Borough boundary will play a key part in this delivery.</p> <p>We would advocate a particular focus on providing for additional growth in those areas located around the Ipswich fringe, including those in Mid Suffolk, given the direct relationship between such areas.</p> <p>It's recognised that other options for the distribution of growth will also need to be included in the Local Plan Review. This could include an element of higher-density urban regeneration and the reuse of appropriate employment land.</p>	Comments Noted and additional support for a hybrid of several of the options.	250 40

		<p>On Behalf of Bloor Homes</p>	<p>In respect of Option 1, we would question whether a higher density urban-regeneration approach could deliver development needs in full. In addition, it is not clear if higher density urban regeneration is viable.</p> <p>We would caution against relying on Option 2. The creation of a new settlement would require provision of entirely new infrastructure, and the cooperation and effective working of multiple agencies. Inevitably, there will be long lead in times for the commencement and completion of development. The use of edge of settlement countryside represents a potentially sustainable Option 3. Such areas have the potential to be well-related to existing services, facilities, transport infrastructure and employment opportunities.</p> <p>Option 4 directing growth east of Ipswich represents a sustainable approach.</p> <p>Option 5 will reinforce the links across the administrative boundaries of Ipswich and Suffolk Coastal as well as supporting the County Town of Suffolk through increased focus of future growth.</p> <p>We question the sustainability of option 6.</p>	<p>Concern that high-density urban regeneration projects will deliver the housing need of the plan period is noted. Further support for a hybrid option.</p>	<p>252 23</p>
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		Pigeon Investment Management Ltd	If the conclusion of the recent Local Plan examination was that housing needs to 2031 could not be met within the Borough, then housing needs to 2036 cannot be met within the Borough. The Duty to Co-operate is clear in national planning policy and legal precedent, and in the conclusions of the examination and local planning policies CS6 and CS7. The only sound option for housing growth is therefore to look to neighbouring Districts to meet the Objectively Assessed Need.	Comment noted	253 62
		Conservative Group	Option 2 is the preferred choice of the group. We must face facts that our Borough boundaries constrain our development in many ways. Ipswich contributes greatly to the surrounding areas and provides many of the main services for the region. What it cannot provide, due to space, is housing so it makes sense that the other areas take a higher proportion of the new developments.	Comment noted	252 86
	Q14: Are there any other distribution options that the Councils should consider, including across the	On Behalf of Kesgrave Covenant	No, unless there are compelling reasons why the growth for Ipswich and Suffolk Coastal cannot be met within those areas, it is not appropriate to distribute that growth more widely across the Housing Market Area - see previous answer to Question 13, and the fundamental principle that OAN should be met within or as close as possible to the area in which it arises.	Comment noted. However, the duty to cooperate provides for Council's to help each other in delivering the expected quantity of new homes now set by a standard method. This will involve IBC in working with each of its neighbouring authorities - through a strategic panel of elected members- to agree the best means of distributing the new homes needed. The arrangements cannot be achieved in agreement with Suffolk Coastal District Council in isolation from the other Council's that share in the Strategic Housing Market area.	248 64

whole of the Ipswich Housing Market Area?	Suffolk County Council SCC	The closure of Rock Barracks around 2027 may have an impact on the spatial choices within Suffolk Coastal.	Comment Noted. The Councils will need to consider options that arise in the future as part of future delivery programmes and review processes.	254 58
	Northern Fringe Protection Group NFIG	The distribution options need to be reassessed to take account of the Government's White Paper targets.	The government's guidance will need to be properly considered for the Local Plan review to be found sound.	249 66
	Private individual	Wickham Market should be considered, and any other locations having good rail access.	The promotion of Wickham Market as a location for development is a matter for the Suffolk Coastal District Council Local Plan. In terms of the response to the IBC the principle of dispersing new homes to sustainable locations with good transport links is noted.	246 80
	Home Builders Federation HBF	Consider a combination of the options. Whilst some higher density development and changes of use must be considered, there will be a need for some of Ipswich's needs to be accommodated elsewhere. IBC should be clear how many homes will be provided elsewhere and ensure that the other authorities allocate sufficient sites to meet those unmet needs. SCDC options will need to take account of the need to meet some of Ipswich's unmet needs. Some could be near to Ipswich but the Council should also consider increasing housing delivery at other towns and villages. SCDC could consider an approach that draws on aspects of each option that will support the necessary growth to meet the needs of the area. The plan must be clear how needs are being met and that there are shared policies,	The HBF submission reflects the revised guidance set out in the NPPF of July 2018. IBC will be in close discussion with its partner authorities, under the duty cooperate.	250 32

			contingency measures and monitoring to facilitate this joint working.		
		Gladman Developments	The opportunity exists for the delivery of a further sustainable extensions to the urban area of Ipswich at Bucklesham Heath Garden Village to support the delivery of the vision for the HMA and FEA` (Please see the Bucklesham Heath Garden Village Vision Document). By supporting significant levels of further growth in the form of a new garden village to the East of Ipswich, the Plan can take a proactive step towards delivering the new homes, infrastructure and facilities that the urban areas needs to create a positive impact on the local, regional and national economy.	The Council will consider all of the key sites promoted in the fringe and put forward proposals to meet the identified need at the next stage of the Plan process - comments noted.	253 86
	Q15: Should the spatial distribution of jobs growth align with housing growth or	Northern Fringe Protection Group NFPG	Regardless of the approach taken, improving accessibility between homes and workplaces must be a priority when developing the Local Plans and assessing infrastructure requirements. A full cross-boundary Transport Assessment of the impact of draft Local Plans is required before they can be finalised.	IBC is cooperating with others in the production of a Transport Assessment.	249 67

	should we take a different approach which focuses on improving accessibility between homes and work places?	Save our Country Spaces SOCS	Regardless of the approach taken, improving accessibility between homes and work places must be a priority when developing the Local Plans and assessing infrastructure requirements. A full cross-boundary Transport Assessment of the impact of draft Local Plans is required before they can be finalised.	IBC is cooperating with others in the production of a Transport Assessment.	250 62
		Suffolk Preservation Society	To be truly sustainable SPS believes that jobs and homes should be proximate to minimise car journeys and safeguard the environment.	Support for the continuation of the homes near to jobs approach noted.	246 99
		Private individual	The question presumes individuals in future are employed and working at workplaces. The number of self-employed has rocketed and growth in start-ups is huge. How about a growth area where there is housing and enterprise space e.g. small/medium sized and shared office/workshop space. To minimise commutes, put space in clusters, not massive industrial estates, but e.g. on Ravenswood an enterprise small business space where they can base themselves rather than driving into the town centre - facilities like Basepoint built closer to people's homes. There is nowhere in Ipswich I could relocate my business to (currently in Bury St Edmunds).	The Council will continue to work for a range of sites offering different types and sizes of commercial and business property.	247 90

		Private individual	A mixed approach is needed, but strategically the aim should be to limit the need for travel to work, and certainly not extended travel (e.g. to London). The effect of London economic growth on the South East has been to encourage more travel to London, leading to overcrowded trains, overpriced houses and worn out commuters. It's a failed strategy.	Please see comment above	246 81
		Private individual	Spatial distributions of jobs should align with housing development.	As above	247 76
	Q16: Do you have evidence which indicates that building at higher densities in Ipswich and Suffolk Coastal would be viable financially?	On Behalf of Kesgrave Covenant	No. The residential market is still primarily focused on family housing, albeit moving away from the largest properties, and there is no evidence of a return to high rise/high density schemes.	Comments noted.	248 65
		Suffolk County Council SCC	Options for increasing densities within Ipswich should be thoroughly explored before further growth is considered on greenfield sites, particularly beyond the administrative boundary. This could include the potential relocation of businesses, which may prefer improved access to the primary route network. However, it should be recognised that more urban locations for businesses, particularly those towards the centre of the town, can offer better opportunities to use sustainable transport for journeys to work.	IBC welcomes the opportunity to consider initiatives for the relocation of existing business premises to sites that offer improved access to the primary route network, provided that the receptor site is appropriate for the purpose suggested.	254 60

		Northern Fringe Protection Group NFPG	We support the current Local Plan densities, which have recently been found by the Planning Inspector to be sound. Clearly Ipswich Borough will have set these as they believed them to be most appropriate. The current building density requirements should be regarded as a maximum to prevent undesirable high-density developments. Lowering the current density levels will only result in lower quality developments with less open space of which there is already a deficit in most areas.	Support of the current Local Plan densities noted. National Planning Policy Framework (2018) paragraph 123(a) requires minimum density standards to be set in plans and therefore setting a maximum density standard would be contrary to national policy.	249 68
		Historic England HE	We would note the difference between high density and high rise. Ipswich in particular has had a number of high-rise buildings to deliver high density. Historic development patterns also provide high density housing at a low-rise level. High density and high rise should not become synonymous. Historic England is commissioning research to better understand how increasing housing density in heritage-rich areas can be achieved in ways sensitive to the historic environment. This will be coming forward during the local plan process and should be considered as part of the evidence base to the local plan.	Comments noted regarding difference between high rise and high density. IBC welcomes the opportunity to review and consider the findings of the Historic England research into housing density in heritage-rich areas.	249 00
		Pigeon Investment	The slowdown in development of high-density development in Ipswich shows that the viability of high	Comments noted regarding slowdown of development rate of high-density in the Borough.	253 63

		Managem nt Ltd	density development in the Borough of Ipswich is an issue.		
		Conservati ve Group	We are against any high-density developments.	Comments noted. See comments above regarding need to set minimum density standards and national policy.	252 87
Q17: Should the policy approach of maintaining the physical separation of villages from Ipswich be continued or should infill in gaps between settlements be considered a source of housing land?		Mersea Homes	Whilst we recognise that existing villages will wish to preserve their character and independence, close to Ipswich - particularly where distances to the town centre are modest - there is an advantage in using land efficiently. This means recognising the setting and character of villages without establishing disproportionate cordon sanitaire.	The Council is committed to ensuring that land is used efficiently and therefore suitable locations will be considered on a site by site basis, informed by landscape evidence.	254 84
		On Behalf of Kesgrave Covenant	We would suggest that the issue of settlement separation is one that needs to be dealt with on a settlement by settlement basis. Historically, expansion of Ipswich has, at times, involved the successful amalgamation of previously free-standing settlements into the urban area, and there may be instances of small settlements that currently display little in the way of separate identity, and where the long-term growth of the town suggests that amalgamation is the most appropriate option. Equally, there will be many settlements where it is quite appropriate to maintain a degree of separation and protection to ensure that their separate identity is preserved. The appropriate approach is to consider on a case by case basis (a) which	Comments noted. Locations will be considered on a site by site basis, informed by landscape evidence.	248 67

		settlements should be protected, and (b) what land is necessary to keep open to ensure that separation, having regard to factors such as local topography, vegetation, settlement form etc.		
	Suffolk Wildlife Trust	Any decision to look at infilling of gaps between settlements must consider any likely impacts on the green infrastructure network of the area. Gaps between settlements are likely to contribute to this network, providing connectivity between greenspaces within the town and those on the urban fringe. These connections must be protected, reinforced and enhanced through the Local Plan.	All key green spaces are to be secured by virtue of the Plan Policy CS4 and national NPPF policies that safeguard important ecological assets. Furthermore, the Council seeks to establish and extend green connections within the Borough through policy DM33. Decisions on infilling gaps between settlements will be taken on a case by case basis, informed by landscape evidence.	250 07
	Northern Fringe Protection Group NFPG	The policy approach of maintaining the physical separation of villages from Ipswich should be continued.	Comment noted. Suitable locations will be considered on a site by site basis, informed by Landscape evidence.	249 69
	Save our Country Spaces SOCS	The policy approach of maintaining the physical separation of villages from Ipswich should be continued.	Comment noted. Suitable locations will be considered on a site by site basis, informed by Landscape evidence.	250 61
	Greenways Countryside Project	We support the continued separation from neighbouring villages. This helps to define the very important 'green rim' of open space around the town.	The Council intends to maintain and extend the publicly accessible green rim around the edge of the Borough to facilitate access to natural and semi natural greenspace.	253 42

		Suffolk Preservation Society	SPS would always seek to protect distinctive settlements and sensitive landscapes while recognising that in some instances sustainable locations should be brought forward in preference to encroaching into countryside.	Comment noted. Suitable locations will be considered on a site by site basis, informed by Landscape evidence.	247 00
		Tuddenham St Martin Parish Council	The policy approach should continue to maintain the physical separation of villages from Ipswich. The source of housing land in infill gaps between settlements should not be considered and preference should be given to developing brownfield sites within Ipswich before developing areas outside the borough.	Comments noted. The Council supports maximising the use of previously developed land within Ipswich and will consider locations for development on a site by site basis.	249 24
		Historic England HE	It is important that the historic pattern of settlement in Ipswich and Suffolk Coastal is maintained through a physical separation of settlements, in particular preventing coalescence between Ipswich and the surrounding villages. The issue of coalescence does not just affect larger towns and cities but we have seen proposals in the region proposing coalescence between market towns and villages. Acceptance of such a principal undermines the setting and purpose of each individual settlement and places pressure on numerous heritage assets which lie in the countryside.	The value of gaps between settlements is recognised as helping to create a sense of place and identity. Locations will be considered on a site by site basis to ensure the most sensitive location are protected from development.	249 02

		On behalf of RSPB	Any actions taken on this matter needs to pay full consideration to the Green Infrastructure network and assess how any decisions may impact upon it.	All key green infrastructure is to be secured by virtue of the Plan Policy CS4 and national NPPF policies that safeguard important ecological assets. The Council intends to maintain and extend the publicly accessible green infrastructure network around the edge of the Borough.	246 45
		Private individual	No. Any area within the A14/A12 should be open for development. Kesgrave etc is part of Ipswich and the residents should deal with it.	Comments noted. The Council will consider locations on a site by site basis.	246 55
		Private individual	I would support expanding sustainable settlements but not merging minor villages by infilling unless they can be made sustainable in their own right.	Comment noted. Locations will be considered on a site by site basis to ensure the most sensitive location are protected.	246 82
		Ipswich Wildlife Group IWG	The continued separation from neighbouring villages is highly valued and should continue, maintaining the valuable green rim open space around the town.	Comment noted. Locations will be considered on a site by site basis to ensure the most sensitive location are protected.	248 21
		Suffolk Constabulary	Yes. Without those spaces everyone's quality of life would be affected. Children and young people would have no-where to play and the recreational and mental health benefits of the open spaces would be lost. Less allocated open space could lead to further conflicts when a higher volume of people try to co-exist without that 'breathing space'.	Comment noted. The Council is committed to establishing and enhancing green spaces within the borough, which contribute towards health and wellbeing of communities.	248 44
		Private individual	Physical separation of villages should be maintained.	Comment noted. Locations will be considered on a site by site basis.	247 75

		On Behalf of Bloor Homes	Whilst the merit of protecting the identity and distinctiveness of settlements and communities is acknowledged, the Local Plan should avoid applying an arbitrary and overly simplistic approach through which development on the edge of Ipswich within Suffolk Coastal District is seen as harmful to such objectives. Such an approach could severely weaken opportunities to promote sustainable patterns of growth, potentially forcing development away from the most accessible locations and further into the open countryside. Instead, such policies should be specifically focussed on protecting landscape of particular value.	Comment noted. Locations will be considered on a site by site basis to ensure the most suitable and sustainable sites are brought forward for development. Decisions will be informed by landscape evidence.	252 24
		Conservative Group	Infill gaps between settlements should be considered for developments where appropriate e.g. Ipswich & Claydon. We believe that villages should retain their identities but there are several areas around Ipswich where there is virtually no separation gap, so this must be considered on a case by case basis.	Comments noted. Locations will be considered on a site by site basis to ensure places maintain their unique identities.	252 88
	Q18: If development cannot be accommodated within Ipswich, should it be	Mersea Homes	We support the need to look beyond the Ipswich administrative area to meet Ipswich's housing need. We therefore support distribution options 2 and 5 in combination. We also support focussing on communities close to Ipswich, particularly where those	The Council will consider all peripheral sites through the SHELAA and their suitability, availability and achievability including those to the east of Ipswich.	254 85

<p>focused within the communities close to Ipswich or distributed within the larger Ipswich Housing Market Area? What criteria should guide its location?</p>		<p>communities are well connected to the town centre, either in distance or transport terms. The IGS, whilst in parts</p> <p>abutting the Ipswich administrative boundary, remains relatively close to the town centre and will be well served by public transport. It would be logical to look beyond this boundary to continue to meet Ipswich's need.</p>		
	On Behalf of Kesgrave Covenant	<p>See answers to Questions 13 and 14 - OAN should be accommodated either within, or as close as possible to within, the area in which it arises, as OAN relates to locally arising need.</p>	Comments noted	24868
	Northern Fringe Protection Group NFPG	<p>As these authorities appear to be concentrating new developments on the boundaries of Ipswich, placing pressure on Ipswich's infrastructure we believe it is reasonable for some increased development beyond the Ipswich Borough boundary.</p>	Comments noted	24970
	Save our Country Spaces SOCS	<p>As these authorities appear to be concentrating new developments on the boundaries of Ipswich, placing pressure on Ipswich's infrastructure we believe it is reasonable for some increased development beyond the Ipswich Borough boundary.</p>	Comments noted	25060
	Suffolk Preservation Society	<p>SPS would always seek to protect distinctive settlements and sensitive landscapes while recognising that in some instances sustainable locations should be brought forward</p>	<p>The Council has produced a landscape sensitivity study which highlights the important of distinctive and sensitive settlements and this will be considered through plan-making and decision-making</p>	24701

			in preference to encroaching into countryside.		
		East Suffolk Travellers Association	The key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Three obvious examples are Woodbridge, Felixstowe and Saxmundham. Leiston also has potential access to the rail network if the branch is again served by passenger trains. Framlingham is 6 miles from the nearest railhead by a secondary road and is thus less of a candidate for growth. A study of estate agents' websites has revealed that "distance to nearest rail station" has overtaken "school catchment" as the most important consideration when choosing where to live.	Comments noted	248 11
		Private individual	I am not convinced that the housing need cannot be met in Ipswich alone. Large parts of brownfield land should be developed before shipping the need to less sustainable villages/towns. If it is truly evidenced that the needs cannot be met within IBC boundaries this should be accommodated from Copdock/Washbrook to Sproughton to Claydon to Martlesham then running within the A12 / A14 to the Orwell Bridge where appropriate. This should exclude any	The Council regularly carries out viability assessment on existing brownfield site allocations and is required to look at peripheral sites to consider sites which may make up any shortfall.	246 56

			environmental aspects i.e. Pipers Vale.		
		Private individual	A principal criterion for selecting development sites should be the alleviation of pressures on the town centre. There is already too much traffic circulating around the town centre and it is damaging the environment and endangering health. There should be scope for developing housing and additional infrastructures on the periphery of the urban area and beyond, and it should be possible to do this in a sustainable way.	The Council understands the importance of Air Quality, particular in the Town Centre and is proposing a new policy to help address this. Housing in the peripheral urban area is always considered and is reliant on the relevant infrastructure and guidance from Suffolk County Council Highways.	247 24
		Railfuture East Anglia	Of the options presented the best seems to be a blend of options 4&5. Key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Woodbridge, Felixstowe and Saxmundham are on the rail network whereas (for example) Framlingham is not. A study of estate agents web sites reveals that 'distance to nearest rail station' has overtaken school catchment as being the most important consideration when choosing where to live.	Comments noted	250 14

		Ashfield Land Limited	The Local Plan Review should, in the first instance, focus development that cannot be accommodated within the Borough in those areas closest to the Ipswich urban area. Such areas are more closely aligned to the services, facilities and employment opportunities available within the Ipswich urban area. It may also be appropriate to accommodate lesser levels of growth within the wider HMA.	Comments noted	250 41
		Pigeon Investment Management Ltd	Ipswich Borough Council should look to sustainable locations with good infrastructure, high accessibility and connectivity to Ipswich. For example neighbouring satellite villages around Ipswich such as Claydon, Sproughton and Wherstead can assist in delivering the housing growth to meet the objectively assessed need for housing in the Borough. These areas are well connected to the town. Another example is the need for liaison with Suffolk Coastal District Council on the potential of growth corridors to the Felixstowe Peninsular, and along the A12 corridor around Saxmundham which can deliver housing growth.	Comments noted	253 64
		Conservative Group (Cllr)	New developments should take place as close as possible to Ipswich but within the neighbouring districts. As the tax revenue for new developments would be lost to	Comments noted	252 89

			Ipswich it is vital that these developments rely on the main economic services of Ipswich which will bring a benefit to the town.		
	Q19: Should Ipswich switch employment land to housing use, even though the Borough has a high jobs target? Where should the Council prioritise protecting employment land?	On Behalf of Kesgrave Covenant	No, there is a need for land for both economic growth and housing growth, so converting existing and viable employment land to housing has no net benefit. Clearly there may be small scale changes to employment land allocations to reflect commercial realities, but as a general principle, it is a self-defeating strategy in the context of the Ipswich economic area.	Comments noted	248 70
		On Behalf of AquiGen	AquiGen notes the identification of employment land as a potential alternative source of residential land. This is acknowledged as a sensible policy option given the OAN. At this stage we note that there has been no actual published assessment of the suitability of employment sites for continued B class/economic development. The consultation document refers to the assessment of sites under the ELSA 07/2017 yet this has not been published. This is a significant shortcoming of the consultation process as it leaves landowners unable to comment on the findings of the ELSA in terms of specific sites and land allocation decisions.	The Council has taken care with the production of the ELSA and this is being prepared for publication at the time that this schedule is being completed. Its earlier production while desirable was not a pre-requisite to progress and does not affect the soundness of the plan. Its current publication will help inform the Reg19 Draft Local Plan stage when site specific considerations will once more become important.	251 00

		Northern Fringe Protection Group NFPG	Whilst accepting the need for providing sufficient employment land sites that offer flexibility to potential employers, the current Local Plan has over a 150% margin over the assessed employment need. Apart from the missed opportunity of sites remaining undeveloped through excess capacity, there is the issue of brownfield sites remaining unregenerated in a manner that makes Ipswich appear a less attractive and vibrant town. There should be an opportunity to make some reallocations from land currently protected for employment use to housing. Similarly, there is an over provision of the allocation of retail space.	The current retail study states that there is a shortfall of retail space in Ipswich, however it is noted that long-established vacant brownfields sites could be re-allocated for housing where appropriate.	249 71
		Private individual	Yes - large bits of land around 'Ipswich Dock' on the eastern side could be used for housing. is there a need for all of the timber merchants within the town?	These sites have been explored through the SHELAA and have subsequently been proposed for allocations accordingly.	246 57
		Private individual	Generally speaking, I would say that space-efficient employment facilities (e.g. offices, labs etc) are good for the town centre, providing there is a good public transport system for commuters. On the other hand, there is a strong case for encouraging industrial premises that occupy larger surface areas with less employees to move further out towards the borders of the Ipswich area.	Comments noted	247 23

		On behalf of FIS Property and Landex Limited	It is considered that Ipswich should switch employment land to housing use notwithstanding that the borough has a high jobs target. In this respect the Council should prioritise protecting high quality employment land which meets the needs and requirements of modern industry/commerce. Other employment land should be considered for housing or mixed used development particularly where more efficient use can be made of that land and urban regeneration results.	Comments noted	248 72
		Private individual	No switching should take place. Protection of employment sites is vital for the economy. The best local plan is one that is smart enough to plan for mixed land use. A local plan that has a focus on housing development will lead to unbalanced planning.	Comments noted	247 73
		Ashfield Land Limited	There will be instances where the reuse of existing employment land for residential development is appropriate. Sufficient flexibility should be provided for sites that are no longer appropriate or required for employment purposes to come forward for alternative uses. This would not on its own be sufficient to meet the levels of growth required across the plan period.	Comments noted	250 42

		Pigeon Investment Management Ltd	With a high jobs target a wide variety of employment land is needed to provide flexibility in the employment land market. The requirements of businesses vary significantly and to meet the jobs target an over provision of employment land is required. This approach was found sound in the recent local plan examination in the Borough.	Comments noted	253 65
		Conservative Group (Cllr)	Employment land is vital to the economy of Ipswich but drawing lines on a map is never an exact science. Consideration should be given, where appropriate, for change of usage for any piece of land within the Borough on a case by case basis.	Comments noted but a consistent approach is required, notwithstanding this, there are certain permitted development rights in place when it comes to changing the use of existing businesses to residential uses.	252 90
	Q20: Is there other land within Ipswich Borough which should be considered for residential developme	Ipswich Community Media	<p>We like the idea of new housing right in the heart of the town and on the waterfront, so there are no ghettos in the town. I.e. - the waterfront genuinely has a mixed economy, rather than just top end flats.</p> <p>We like the coop becoming a new school - so there is life and youth in the heart of the town.</p>	The Council encourages a mix of housing tenure through Policy CS8 and will continue to do so. The proposed school is ongoing.	254 65

	nt? Is the approach to protecting open space the right one?	On Behalf of Kesgrave Covenant	<p>Yes, specifically SHLAA site IP184 and adjoining land within the Ipswich/Suffolk Coastal boundaries, as per our separate 'call for sites' responses to both Ipswich Council and Suffolk Coastal Council.</p> <p>Whilst it is inevitably the case, therefore, that part of Ipswich's OAN will be 'exported' to neighbouring areas, and whilst it is the case that opportunities for accommodating further growth within the Ipswich boundary are limited, the fact remains that there are development options on and adjacent to the Ipswich boundary (including some of the remaining areas of countryside within the IBC boundary, as recognised by the Local Plan Inspector in his findings), and logic dictates that these should be the first opportunities to be used, before consideration is given to distributing development further afield</p>	Comments noted and the sites referred to will be considered for potential allocation as part of the Local Plan review.	248 73
		Sports England	<p>Sport England considers that existing open space of community/amenity value (including playing fields and other outdoor sports facilities) should be protected from development, unless replacement provision of equivalent or greater quantity, quality and accessibility is proposed.</p>	The Council understands the importance of Open Spaces and will only consider redevelopment of these sites where there has been a surplus identified and/or equal quality replacement facilities can be provided elsewhere.	248 77

		On Behalf of AquiGen	<p>Futura Park and the remaining plots that are currently allocated for B-class employment. The plots have been made available since 2012 and yet have not attracted any mainstream B-class developers. This is significantly beyond the current 12-month period for positive consideration of alternative use under Policy DM25. This provides a clear market signal that the land should be considered for</p> <p>alternative use within the wider 'Economic Development' definition. This will ensure that the Site can continue to make a positive contribution to the local economy through job creation, inward investment and diversity.</p>	Comments noted, the viability of all sites is regularly reviewed.	251 01
		Northern Fringe Protection Group NFPG	<p>There is an over provision of land allocated to retail space within Ipswich. It was a mistake for the current Local Plan to extend the Ipswich Central Shopping Area to include the Westgate Quarter. This decision should be reconsidered and the land incorporating allocations IP40 and IP41 reallocated for mixed residential and employment use. It is not realistic to release large areas of protected open spaces within the Borough to residential development, given the current shortfalls of Open Space. We strongly oppose any attempt to use what little remaining countryside there is in the Borough for homes.</p>	The Council comments that there is a requirement for more retail space, as identified in the Retail Study but will considered mixed-uses on sites allocated for retail where appropriate.	249 72

		Greenways Countryside Project	Protecting existing open space is vital. To meet the needs of a growing population and in light of declining wildlife populations, all the open space in Ipswich is needed and more. Any change of policy to allow building on open spaces would be significantly detrimental and unsustainable.	Comments noted	253 43
		Suffolk Preservation Society	SPS considers that open space in urban areas is valuable to well-being and residential amenity and should be protected.	Comments noted	247 03
		On behalf of RSPB	It is not only essential that the protection of green space is upheld, but also that the overall tone of such a question should be about enhancing these areas. Evidence shows that those who live within 500 metres of accessible green space are 24% more likely to meet recommended health levels of physical exercise.	Comments noted	246 46
		Private individual	Yes - if Ipswich is really struggling to meet its housing needs then surely a town centre recycling centre should be reallocated elsewhere. Car parks are plentiful within the town. Why not turn a number of the car parks into multi-storey car parks and build on the other car parks. Cheap car parking is plentiful in the town. A reduction in the number of car parking spaces could seek to promote sustainable modes of transport reducing the traffic in the town	Comments noted, a multi-storey car park has been completed at Crown Street and another is allocated on West End Road.	246 58

		Ipswich Wildlife Group IWG	The existing open spaces in Ipswich are vitally important and need to continue to be protected from development for the benefit of the growing population and wildlife.	Comments noted	248 22
		On Behalf of Merton College	Merton College takes this opportunity to identify its land holdings at Rise Hall, located in the Ipswich Fringe. Whilst the College acknowledges the unfavourable SHLAA assessment Akenham, in the context of the potential link road (Ipswich Northern Route), Rise Hall, can assist in delivering sustainable housing growth in the HMA. The provision of a comprehensive proposal in this location could assist with the delivery of strategic infrastructure associated with the emerging relief road around Ipswich. The site has been submitted to Babergh and Mid Suffolk Councils' and Ipswich Council's Call for Sites.	Comments noted, the site is not within the boundary of Ipswich and therefore is not under our planning control. The Council recognises the strategic importance of this area for the wider Ipswich HMA and potential Northern Routes and will be considered through the SHELAA process.	251 09
		Pigeon Investment Management Ltd	To achieve employment growth targets a wide range of employment sites are required. There is little countryside in the Borough that is accessible and developable. Given the demand for housing in the last 20 years the delivery of sites in the Borough which have not been taken up over this period should be questioned. The only remaining option to meet the Objectively Assessed Need for housing is to develop land outside the Borough in neighbouring Districts	Comments noted - All areas are explored for development through the SHELAA	253 67

		Conservative Group (Cllr)	The Conservative Group believes in the continued protection of the Borough's open spaces but also recognises the desperate need for housing land. As with other choices development should be considered on a case by case basis. Ipswich is extremely well served with open spaces both large and small. If housing pressures continue to grow, then we would be foolish to deny the opportunity to even discuss the possible change of usage to any piece of land.	Comments noted	252 91
	Q21: Where do you think the most appropriate locations are to meet this [provision for Gypsies and Travellers] need?	National Federation of Gypsy Liaison Groups NFGLG	<p>Policy CS11 in the adopted plan is not fit for purpose and needs radical review. It is not compliant with current government policy. Amongst other concerns we consider that ;</p> <ul style="list-style-type: none"> * the implied requirement to show a lack of existing availability is unacceptable; * the requirement to be within 1km of services is unrealistic and unduly restrictive; * the need for sites to be large enough to accommodate business activities is unnecessary. <p>There is also a desperate need for a more pro-active approach to site provision.</p>	Comments noted	248 05

		Suffolk Constabulary	<p>An out of town location is preferred.</p> <p>New sites should be below 20 pitches.</p> <p>It is essential to consult closely with traveller groups, local residents and the police at the start of any site consideration and follow government advice on best practice.</p>		248 45
The Provision of Retail and Leisure Development	Q22: Which town centres should we plan to expand?	Babergh Mid Suffolk	In the consideration of retail and leisure options which have strategic significance, where relevant, regard should be given to the Babergh and Mid Suffolk Joint Town Centre and Retail Study (2015) and the proposals set out in the Babergh and Mid Suffolk Joint Local Plan Consultation Document. The proposals and policy approach seeks to protect and enhance provision across the network of market towns and restrict out of centre provision which could be detrimental to this objective across Babergh and Mid Suffolk.	Comments from Babergh and Mid Suffolk noted. The findings and outcomes of the Babergh and Mid Suffolk Joint Town Centre and Retail Study (2015) will be brought into consideration in devising any town-centre/ retail related policies.	254 00
		Ipswich Limited	The long-throw nature of Ipswich Town Centre from what was the West Gate to the East Gate, should be restored.	Comments noted. It is interpreted that the existing Town Centre Boundary defined on the Policies Map includes the historic West Gate and East Gate parts of the town.	254 06

	Q23: Are there town centres that should be reduced in size?	Historic England HE	The town centres in Ipswich and Suffolk Coastal are historic and contain significant concentrations of designated heritage assets. Retailing is changing and that has an impact on the buildings housing them, many of them historic. Each centre is different, but consideration needs to be made of whether town centres are sustainable as currently constituted, the usages for buildings are correctly identified and they are adequately protected from harmful change of use or conversion. A planned approach to reinforcing the importance of the town centres as a sustainable location, and consideration of appropriate, alternative or additional uses which will provide a strong future for the buildings, is key. A further consideration is the retention of original/historic or significant shopfronts. A development management policy should be in place to manage their change successfully.	The high concentration of designated heritage assets and the need to plan sustainably for town centres is noted. Policies relating to shopfronts will be explored as part of the Local Plan review process.	249 08
		Private individual	Reduce the town centre in Ipswich - no need for the size it is. The world has moved on.	Comments noted. Any modifications to the town centre boundary will be considered as part of the Local Plan review process, taking the recommendations of the Ipswich Borough and Suffolk Coastal District Retail and Commercial Leisure Study (2017) into account.	247 93

		Conservative Group	The group believes in a general shift of the focus of Ipswich Town Centre from its current east/west axis to more of a north/south axis. The edges of the current town centre (Carr St & Westgate St) are perfect examples where a change of usage should be considered. Many of the retail units are either empty or filled with temporary shops and those retail units that are successful could easily be relocated to other areas. We could introduce more town centre living and then concentrate the retail and leisure offering from the current town centre towards the waterfront. Ipswich is not big enough to be able to develop the area towards the waterfront whilst still attempting to retain the same length of high street running through the centre.	The observed shift in the focus of the Town Centre and suggestion to diversify the edges of the town centre are noted.	252 92
	Q24: Which sites should be identified through the Local Plan reviews for future retail growth?	Conservative Group	We do not need to increase retail space within Ipswich. There remain acres of unused land at the Crane site, empty units in the town centre and at all the shopping parades within the borough. We do believe in promoting growth in the local shopping areas and edge of town sites currently in operation.	The comments regarding the lack of need for retail space and high vacancy rates in the Borough are noted.	252 93
	Q25: How do we increase the range of uses or activities in	Ipswich Community Media	Please support and expand the nightlife in a QUALITY - we have been told first hand by authorities, that larger new good music sites are not really wanted due to keeping people in the cardinal park area. We	Comments and suggestions regarding nightlife and music provision noted.	254 66

	Ipswich town centre, given its role as a regional centre, and what should they be?		run a small music hub but crying out for genuine music arts centre in the town. Support a growing arts and music centre and WET arts studios hubs! They DO bring in revenue!		
		AquiGen	We recommend that the emerging Plan proactively explores and identifies alternative land use policy options which in themselves can have benefits for the Town Centre (e.g. residential).	Comments noted and potential opportunities to identify alternative land uses in the Town Centre will be considered as part of the Strategic Housing and Employment Land Availability Assessment which will inform the Local Plan process, as well as any relevant development management policies.	251 04
		Historic England HE	The town centres in Ipswich and Suffolk Coastal are historic and contain significant concentrations of designated heritage assets. Retailing is changing and that has an impact on the buildings housing them, many of them historic. Each centre is different but consideration needs to be made of whether town centres are sustainable as currently constituted, the usages for buildings are correctly identified and they are adequately protected from harmful change of use or conversion. A planned approach to reinforcing the importance of the town centres as a sustainable location, and consideration of appropriate, alternative or additional uses which will provide a strong future for the buildings, is key. A further	See previous HE response (24908).	249 09

			consideration is the retention of original/historic or significant shopfronts. A development management policy should be in place to manage their change successfully.		
		Private individual	Re-evaluate supply/demand for the main town. There has been a drive to bring large retail chains to the town but it contradicts what is happening (large retail at Futura Park and Martlesham). I only go into Ipswich for specialist shopping, the station and football club, i.e. things I cannot find online. People go to a town centre for the experience and that has to be unique rather than replicating all other towns. We need a drive to develop spaces to offer the right space for small retail, boutique business and for specialist start-ups to thrive in, providing a unique experience.	Comments noted regarding supply/ demand for the main town and will be considered as part of review of Local Plan.	247 86
		Private individual	Ipswich town centre has various activities but in certain times lacks energy and variety. To increase activity, use both its significant history and the picturesque areas e.g. the Waterfront. Currently the centre is mainly about shopping and it gets really quiet in the evenings. Create a 'Heart of Ipswich' walk or tour visitors can enjoy or a route that	Comments regarding the lack of activity in the town centre and will be borne into consideration as part of Local Plan review. Suggestions regarding improved walking experience and tourism noted.	247 95

			will include walking, cycling, education and entertainment that will go from A to B (Waterfront to the North) and be designed considering the character of the route, not worrying about A or B. A route for locals and tourists to enjoy.		
		Private individual	Thought needs to be paid to the huge number of empty retail units on Duke St/Stoke Quay development conducted within the past 10. Duke Street already has a Tesco's, a couple of takeaways, hairdressers etc therefore I do not see what other businesses would be interested in moving into the units. Future developments should use this failing and include only a limited amount of retail units should be included, and the land may be better used as a car park or for community use. If used as under flats car parking this would free up land to increase the density	Comments regarding empty retail units noted. Comments relating to provision of retail and other uses will be considered as part of the part of the Strategic Housing and Employment Land Availability Assessment which will inform the Local Plan process, as well as any relevant policies.	246 59
		Private individual	Start turning many of the shops which are not used into residences and putting boutique shops around the town. It would also be nice if we could start encouraging more cafe style of living within the town and increasing the number trees rather than planters. Stop the number one problem: fear of going into town after dark. The town needs to find ways of reducing violence and the number of drugs within the centre at night. One of the ways of dealing	Comments regarding town centres noted and will be considered as part of Local Plan review process. Concerns regarding violence and drugs also noted. IBC is not responsible for the number of police and dogs as this is the responsibility of Suffolk Constabulary.	248 34

			with drugs would be to increase the number of police and dogs at the station entrance.		
		Suffolk Constabulary	<p>Any redevelopment of the town centre must factor in both anti-terror mitigation features as well as Designing Out Crime advice. In both cases, quality CCTV should be included.</p> <p>Incentives should be offered to (smaller) independent shops to help create a sense of identity.</p> <p>Increased promotion of the town through events such as Christmas markets and attractions such as Pigs Gone Wild that encourage people who may not normally come into the town centre to visit.</p> <p>Provide more park and ride options (i.e. re-open Bury Rd, even if only for peak periods).</p>	Comments regarding CCTV and crime-prevention measures noted. Promotion of events and park and ride options is not managed through the Local Plan Review process.	248 46

		Private individual	We should protect all the current green spaces in the town centre and perhaps include extra small parks and gardens where possible. A conference and exhibition centre near the Waterfront could be a positive development that would help promotion of local businesses.	Comments noted.	247 25
		Ipswich Central	<p>IBC has shown an entrepreneurial approach to granting permissions for more mixed uses alongside retail. This must continue, as town centres can no longer be sustained on retail alone, and require a much broader range of leisure, service and experiential-based occupiers.</p> <p>Additional reasons to visit and stay, including additional hotel space and attractions, must be planned for. A new visitor experience must be encouraged on the Waterfront, where further increases in the height of buildings opens up views northwards to the Park and beyond, and southwards. Any opportunity for the creation of a cultural hub, incorporating existing operators.</p> <p>As part of the redevelopment of the Cornhill, detailed plans should be made for the future use of the new Square to create a vibrant community space that operates as an important, managed open space attraction.</p>	Comments of support appreciated. Hotel space and attractions will be planned for in accordance with the recommendations of the Retail and Commercial Leisure Study (2017). Comments regarding waterfront and cultural hub noted. The public space outside the Cornhill will be included in the Public Realm Strategy Supplementary Planning Document which is being prepared.	250 91

		Ipswich Community Media CIC	Support the development of the arts centre for Ipswich campaign and other grass roots cultural development.	Comments noted.	252 48
		Conservative Group	Instead of trying to compete with other better served retail centres such as Norwich, Colchester, Chelmsford, Freeport Braintree and Bury St Edmunds we should aim to become the main centre for culture and leisure activities whilst retaining our retail offerings.	Suggested approach for Ipswich to become the main centre for culture and leisure activities whilst retaining retail offerings noted and will be considered as part of Local Plan review.	252 94
		Private individual	Make the old BHS store into an indoor market.	Comment noted.	255 34
	Q27: What approach should be taken to further out of centre shopping? Does out of centre shopping complement or compete with the existing town centres?	On Behalf of Aqigen	The Evidence Base published to date identifies that in terms of the Town Centre, present policy tools have been effective in managing out-of-centre development and ensuring it can be complementary. In formulating policy for retailing in the Ipswich area, we consider that the present NPPF Sequential and Impact tests are entirely adequate for the purposes of controlling any further proposals for out-of-centre retail development.	Comments noted. Any review of the Local Plan will need to comply with national planning policy.	251 05
		Private individual	Personally I am not very positive about the remote shopping centres. Yes, they are in some cases needed if they are close to dwellings, but their current design promotes the use of cars. They are often remote and don't provide sustainability at all. If something like this is needed then it should integrate to the	Concerns regarding out-of-centre shopping noted.	247 96

			existing landscape, considering the environment.		
		Ipswich Limited	There is a worrying trend of retail parks selling non-bulky items which is unacceptable competition for the town centre. Whether it is B&M or Currys PC World, most of the products are small enough to not be impractical to purchasing in the town centre.	Concerns noted.	254 07
		Conservative Group	Further out of town shopping should be encouraged where appropriate. Access to these sites is better and they provide more opportunities for larger retailers who struggle to find anything of a suitable size in the town centre. They also have the added benefit of reducing the traffic in and around the town centre which in turn makes it a more attractive place for culture and leisure activities.	Support for appropriate out-of-centre shopping noted.	252 95
		Private individual	Encourage Ikea to Ipswich. The sugar beet site on Sproughton Road would be ideal, direct access from the A14. Would bring people in from the surrounding areas.	Suggestion of encouraging a large-scale retail unit at the sugar beet site on Sproughton Road noted.	255 12

	<p>Q28: Should the existing retail parks be considered as centres in their own right, or should town centres continue to be the first choice location for new shops and leisure uses?</p>	<p>On Behalf of AquiGen</p>	<p>The ability to robustly and credibly define a Retail Park as a 'Centre' does rely on the relationship of the Park with the NPPF definition of a Town Centre. NPPF requires a Plan to include strategic policies for the provision of inter alia retail development. This supports the introduction of specific policy recognition for a Retail Park and the formulation of positive policies to identify an opportunity to evolve, support a specific need and enhance provision across an area. In this context we recommend that Futura Park warrants identification as a strategic Retail Park site.</p> <p>Furthermore, affording the opportunity for a de facto extension to the east of Nacton Road would enhance the complementary relationship which exist with Futura Park.</p>	<p>Recommendation to identify Futura Park as a strategic Retail Park site and possible eastwards expansion noted.</p>	<p>251 06</p>
		<p>Ipswich Limited</p>	<p>Retail parks are centres in their own right. If local shops can be designated as local centres and district centres, the much larger floor space retail units can definitely be considered centres in their own right, especially with the nature of them being a destination.</p>	<p>Position on retail parks being centres in their own right noted.</p>	<p>254 08</p>

		Conservative Group	Retail Parks should be considered as centres in their own right.	Position noted.	252 96
Infrastructure	Q29: What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined?	Associated British Ports ABP	ABP will continue to assist the Council in developing a feasible solution for the Upper Orwell Crossings and for all modes access to the Island site. ABP also supports the efforts of IBC and SCC to progress the Ipswich Northern Route Study and to bring forward proposals to secure transport capacity improvements which will benefit strategic and local traffic accessing and egressing the Port.	Support for the Upper Orwell Crossings noted. At the time of this response a further costings and feasibility study were being completed.	250 78
		Suffolk Wildlife Trust	All areas need sufficient high-quality greenspace, with good connectivity to and through the network.	Noted	250 15
		Suffolk County Council SCC	Given the variety of spatial options which could, at this stage, come forward through the Plan, it is difficult to offer conclusive comments on the infrastructure which will be needed, but relevant issues to consider are as follows. Transport, see question 30; education, see question 32. Fire and Rescue: the Local Plan should create safe and accessible environments in respect of	Comments noted. The Portmans Walk WRC is the subject of ongoing consultation with the Suffolk MWLP. Other infrastructure needs will be the subject of further joint working.	254 57

			<p>infrastructure needs, access by services and water supply. Libraries: modern libraries are the hub of communities and may be a relevant consideration in determining settlement hierarchy and levels of growth. Waste: the Plan should support sustainable waste management and reduce demand on waste infrastructure. Current facilities at Foxhall Road and Portman's Walk are over capacity.</p>		
		Northern Fringe Protection Group NFPG	<p>A northern relief road will be required to accommodate the build-out of the Ipswich Garden Suburb and ease current congestion. Road improvements are required to alleviate existing congestion in the town centre and will also be required to accommodate new developments. The Ipswich Garden Suburb SPD infrastructure requirements are all required, as are those specified as conditions to planning applications. Air quality urgently needs improving before encouraging cycling and walking in AQMAs. Improvements to Westerfield Railway Station and the Ipswich-Felixstowe line are required, and an assessment of the viability of a further station in the vicinity of Futura Park.</p>	<p>The Ipswich Garden Suburb is capable of being delivered with additional traffic management measures and junction improvements within the existing highway network. The Northern Distributor route is likely to be considered as a free-standing project which will be developed further over the initial phases of the plan period. Air Quality measures are being introduced through a new policy and further rail improvements are being explored with partners. At this stage a new station at Futura Park looks unlikely due to financial viability.</p>	249 73

		Save our Country Spaces SOCS	Road improvements are required to alleviate existing congestion in the town centre and will also be required to accommodate new developments. The Ipswich Garden Suburb SPD infrastructure requirements are all required, as are those specified as conditions to planning applications. Some are needed ahead of development. SOCS still oppose multiple starts. Air quality urgently needs improving before encouraging cycling and walking in AQMAs. Specific cycling/walking measures need to be implemented. Improvements to Westerfield Railway Station and the Ipswich-Felixstowe line are required, and an assessment of the viability of a further station in the vicinity of Futura Park.	Please see comment above.	250 59
		Greenways Countryside Project	Additional significant areas of semi-natural greenspace are required (in addition to the proposed Garden Suburb country park) across the Ipswich Policy Area to sustain the likely levels of housing growth. Orwell Country Park requires the inclusion of all of the land at Pond Hall Farm to allow sustainable access and reduce disturbance of overwintering wildfowl in the Orwell Estuary SPA.	The Plan will maintain commitment to the concept of inter-connected open spaces that can be used for both natural wildlife corridors and dual-purposed for cycling and walking. The plan will also seek to consolidate a "green rim" running as a network of loosely connected sites around the edge of the town. Pond Hall Farm will remain an important element of the network.	253 44

		Tuddenham St Martin Parish Council	Improved public transport provision and transport links are required that meet the needs of the community and neighbouring communities. These include buses which tie in better with local school timetables and improvements in the travel service between neighbouring villages in order to reduce individual car journeys. Cycle provision should also be improved, particularly utilising bridleways and footpaths where appropriate to enable movement away from main roads.	Comments Noted.	249 27
		Natural England NE	We note the reference to the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (page 39) and agree that the implementation of this strategy within Ipswich Borough and neighbouring districts will result in new residential development having no likely significant effect in combination on internationally designated sites. New figures for predicted housing growth will need to be included in the evidence base and the tariff calculations for the strategy.	Comment welcomed.	249 98
		Historic England HE	The Landscape Character Assessment and Landscape Sensitivity Study should include heritage assets and their settings, e.g. scheduled monuments, registered parks and gardens, conservation areas. This should prevent the Study identifying an	The Council's evidence base is comprised of many documents and mapped constraints to development, including Heritage Assets and Ancient Monuments.	249 15

			<p>area of land containing, e.g. a scheduled monument to have low sensitivity to development. We also note that design and heritage assessments are planned. Given the historic nature of the district and Borough and the levels of growth proposed, it is likely that heritage impact assessments will be needed for sensitive sites to identify whether/how much development is possible and whether mitigation or enhancement measures can be incorporated.</p>		
		Suffolk Chamber of Commerce	<p>We support Better Broadband for Suffolk to roll out superfast (24 Mbs) broadband and: 100% coverage by the end of 2017; business prioritisation; and 100% 100 Mbs coverage by the end of the decade. The Plan policies should take account of the very real need, for new developments and retro-fitting.</p> <p>Likewise we hope that the Plan will include policies which promote 100% 4G mobile technology coverage by all networks, through provider collaboration where possible.</p> <p>Regarding utilities the Plan should ensure that water provision, waste water disposal and electricity provision at all employment sites are adequate for present and future needs.</p>	<p>Comments concerning utilities noted. The NPPF 2018 provides support for Councils (para 110) to deal more firmly with Broad band and mobile technology.</p>	251 66

	private individual	Ipswich is very wide in comparison to other towns. This does not help in making the whole town accessible. Go north (with development), put the infrastructure in and build the northern route. Also provide proper cycle roads. [See also response to Q4 regarding cycling infrastructure].	The Council will continue to develop proposals for cycling and walking as opportunities present themselves within major development proposals. Preparatory studies for the Northern Distributor Road are being developed for further consideration and public consultation.	247 88
	Private individual	Whilst not a planning issue if Suffolk C.C. actually sent buses where people wanted to go there would be a reduction of traffic in the town and no need for a northern Ipswich bypass. The wet-dock crossing is a must as this will have a positive impact on the town - please do not back down on this due to political pressure. The future of Ipswich is far more important than a temporary MP.	Cross town bus services have been trialled previously but found to be non-viable without public subsidy. The Upper Orwell Crossings are the subject of a financial review at the time of response.	246 60
	Private individual	Major improvements to the A12 (e.g. Four Villages bypass) are critical it is known that improved infrastructure bring economic benefit as well as improving productivity.	Comment noted - works beyond IBC plan area.	246 84
	Ipswich Wildlife Group IWGpr	Ipswich needs more significant green spaces to sustain increased levels of housing and population growth.	Comments welcomed	248 23
	Suffolk Constabulary	Work as described to alleviate the one-way system (i.e. new bridges and access). Proportionate provision of schools, medical facilities etc with every new development.	Comments noted	248 47

			Consideration of the impact on the ability to police newly developed areas and contributions towards additional costs.		
		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	<p>Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. This response relates to the impact on primary care services only. Existing GP practices in the area do not have capacity to accommodate significant growth.</p> <p>In terms of optimal space requirements to encourage a full range of services to be delivered within the community there is an overall capacity deficit, based on weighted patient list sizes¹, within the 16 GP Practices providing services in the area.</p> <p>Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to effective healthcare provision.</p> <p>Notwithstanding this, there should be a reasonably worded policy within the emerging LDP that indicates a supportive approach from the Local Planning Authority to the improvement, reconfiguration,</p>	The Council is now engaged in the exchange of information necessary to ensure a clear understanding of the growth pressures that accompany planned development and the possible long-term effects on the NHS Sustainability and Transformation Plan for the Ipswich area.	248 93

			<p>extension or relocation of existing medical facilities. This positive stance should also be indicated towards assessing those schemes for new bespoke medical facilities where such facilities are agreed to in writing by the commissioner. New facilities will only be appropriate where they accord with the latest up to-date NHS England and CCG strategy documents and are subject to the NHS England prioritisation and approval process.</p>		
		private individual	<p>The development of the Island Site sounds like a good idea, but I have strong doubts about how the planned vehicle bridge could affect traffic across the southern part of Ipswich. If it draws traffic away from Star Lane and College Street, it could merely shift congestion away from these areas into other residential areas of the town, especially if it draws traffic off the A14 as well. Modelling of the possible effects of the new infrastructure has focussed on journey times; it should focus on potential pollution levels.</p>	<p>The Upper Orwell crossings are under review at the time of this response.</p>	<p>247 26</p>

		Private individual	Chaos is what happens when the Orwell Bridge is closed because of either weather or an accident. The Princes Street Bridge by Ipswich Station needs improvement	Comments noted	247 48
		Railfuture East Anglia	Improvements to the local rail network. Atkins consultants for 'East-West Rail' are advancing the case for increases in the frequency of rail services into Ipswich from Bury St. Edmunds and Felixstowe but this will require additional platform capacity at Ipswich and double tracking the Felixstowe line. Ipswich Garden Suburb should benefit from a relocated station at Westerfield to provide sustainable transport links to the rest of the network. The East Suffolk line should be double track as far as Saxmundham (currently only as far as Woodbridge). This would enable the services to run every half hour to Woodbridge and Saxmundham and provide Woodbridge with a more attractive service into Ipswich.	There may be space available for additional platforms at the Ipswich station but the decision to make such an improvement is a commercial decision rather than a matter for planning policy. The Council is working with Network Rail and Greater Anglia to improve the East Suffolk line with a view to encourage new IGS residents to participate in rail travel.	250 11
		Gladman Developments	It is positive that the future infrastructure and transport requirements for the Ipswich urban area are being considered at a strategic level through the plan making process and that projects are underway to explore alternative options for east-west routes. The	Comments noted	253 92

			Local Plan provides the opportunity to manage growth in a manner that supports infrastructure delivery by setting a framework to shape investment in homes, employment sites, schools, health care facilities, community facilities, retail, public transport and roads. Garden Villages provide an opportunity to deliver a number of key objectives in this regard.		
		Ipswich Limited	A dual carriageway Northern Bypass, Copdock Interchange and Nacton junction upgrades, and rail upgrades as specified above in another question.	Comments noted.	254 09
	Q30: How can the strategic transport connections be enhanced and improved?	Associated British Ports ABP	<p>ABP requests the identification of the Port of Ipswich as a strategic transport hub and the inclusion of policy (ideally) and wording which specifically seeks to support and protect the function and role of the Port in the town.</p> <p>ABP would like to see improvement of the junctions on the A14 around Ipswich in order to accommodate existing and future growth. ABP supports the efforts of IBC and SCC to lobby Highways England for such improvements and investigation of other potential improvements to the A14 and A12(S) corridors.</p>	Comments and Support noted	250 79

		Suffolk County Council SCC	<p>Opportunities to maximise walking, cycling or using public transport must be a key part of working through the spatial strategy. Further road capacity serving Ipswich may also be necessary. This can be assessed using the SCC transport model. We welcome the potential to integrate consideration of the feasibility of a new northern route during the local plan review process. It may be required to mitigate the impact of further growth needed to meet currently identified need, but higher levels of growth may be necessary to secure sufficient funding. Proposals along the A12 corridor would offer the opportunity to use the East Suffolk rail line. SCC would like to explore opportunities to enhance walking and cycling connectivity between Ipswich and Martlesham, and within Ipswich. The double tracking of the Felixstowe Branch is an opportunity to promote greater modal shift. The cumulative transport impact of the development of sites will need to be the subject of further work to address issues such as cumulative impacts of development on routes in, around and through Ipswich, including the strategic A14 and A12 routes.</p>	<p>The Council welcomes the opportunity to develop these comments further during the plan preparation process.</p>	254 45
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		Northern Fringe Protection Group NFPG	Traffic flows and air quality need to be monitored and assessed as new developments are built out under current Local Plans, and remedial action taken when required. Until such remedial action has been shown to be effective, further development around problem areas should be curtailed. Planning conditions relating to transport infrastructure/travel plans should be enforced. Cross-boundary Transport Assessments are required for the draft Local Plans and any remedial measures identified, tested (through modelling) and implemented. Assess the viability of direct cross-town bus routes that avoid the need to go into the town centre, e.g. Ransomes via the hospital to Whitehouse.	Air quality will be monitored in support of the Council's Air Quality Management Plan. (AQMP) Development Management decisions will also have regard for the proposed AQ management policy which will allow planning permission to be refused where AQ standards are breached.	249 74
		Save our Country Spaces SOCS	Traffic flows and air quality need to be monitored and assessed as new developments are built out under current Local Plans, and remedial action taken when required. Until such remedial action has been shown to be effective, further development around problem areas should be curtailed. Planning conditions relating to transport infrastructure/travel plans should be enforced. Cross-boundary Transport Assessments are required for the draft Local Plans and any remedial measures identified, tested (through modelling) and implemented. Assess the viability of direct cross-	As above	250 58

			town bus routes that avoid the need to go into the town centre, e.g. Ransomes via the hospital to Whitehouse.		
		Tuddenham St Martin Parish Council	Improved public transport provision and transport links are required that meet the needs of the community and neighbouring communities. These include buses which tie in better with local school timetables and improvements in the travel service between neighbouring villages in order to reduce individual car journeys. Cycle provision should also be improved, particularly utilising bridleways and footpaths where appropriate to enable movement away from main roads.	This comment is well founded, but the provision of home to school education transport is the responsibility of SCC. Similarly, the references to bridleways and travel between neighbouring villages would seem to refer to locations outside of the Borough. However, the comments will be explored as the Council develops any ideas on a cross boundary basis.	249 28
		Babergh Mid Suffolk	The importance of the delivery of the necessary infrastructure to support growth and development is recognised in both the Ipswich and Suffolk Coastal Plan Review and the Babergh and Mid Suffolk Joint Local Plan Consultation Document. We will continue to engage in future discussions on infrastructure solutions which will be critical to the ongoing economic prosperity of Suffolk. As a matter of detail with regard to the reference to page 4 please note that at this stage Babergh and Mid Suffolk Councils are not intending to undertake a	The Council will continue to cooperate on Infrastructure delivery in the Ipswich area and especially on cross border issues as they are identified. The Council will keep its participation in the Community Infrastructure Levy under review but currently believes that it can realise its maximum contribution to the public infrastructure purse through the planning obligations process.	254 01

			revised Strategic Flood Risk Assessment or Water Cycle Study.		
		Private individual	There is a big opportunity to enhance rail services in the area by reualling the line section between Woodbridge and Saxmundham. With the new rail fleet due in 2019 the service can be made more frequent and of better quality, and with the promised through services from Lowestoft to Liverpool Street settlements close to the line could become more attractive housing areas, enhancing local economies. Redualling of the line would also enable freight services into Sizewell C.	The Council is working on the delivery of rail improvements through its participation in rail and infrastructure delivery groups.	246 83
		Private individual	Extend Crossrail (Elizabeth Line) from Shenfield to Ipswich. Possibly look to have four track from Ipswich to Manningtree. (Could link in with new depot).	Decisions of this scale are beyond the scope of the IBC local Plan and are the responsibility of Network Rail and the Dept. of Transport.	247 49

		Network Rail	<p>Network Rail's Anglia Route Study (2016) looks to forecast growth to identify key areas for improvement for the next ten years, to enable the network to meet future needs up to 2043 (see: https://www.networkrail.co.uk/runnig-the-railway/long-term-planning/).</p> <p>We would welcome engagement throughout the development of an Infrastructure Delivery Plan to ensure rail enhancements are accurately captured and funding sources identified. Enhancements currently identified in Network Rail's strategic planning for investment include:</p> <ul style="list-style-type: none"> * Haughley Junction doubling, and * Enhancement and Liverpool Street Station. <p>There is also an aspiration to enhance the East Suffolk Lines. In general, the need to close level crossings should also be considered where any development is likely to increase or change the nature of usage at a crossing. We would welcome a policy to support level crossing closures within the Local Plan.</p>	<p>The level of contact expected has now been established through the Growth Programme Board Infrastructure planning group. There are some reservations that development in Ipswich can be expected to contribute to Liverpool Street station improvements as this is unlikely to pass the tests expected for s106 agreements however, rail improvements that encourage the use of Ipswich station and contribute to people participating in rail travel to commute will be supported through the Growth Programme Board group.</p>	249 51
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		Rail future East Anglia	Improvements to the local rail network. Atkins consultants for 'East-West Rail' are advancing the case for increases in the frequency of rail services into Ipswich from Bury St. Edmunds and Felixstowe but this will require additional platform capacity at Ipswich and double tracking the Felixstowe line. Ipswich Garden Suburb should benefit from a relocated station at Westerfield to provide sustainable transport links to the rest of the network. The East Suffolk line should be double track as far as Saxmundham (currently only as far as Woodbridge). This would enable the services to run every half hour to Woodbridge and Saxmundham and provide Woodbridge with a more attractive service into Ipswich.	Please see response to 25011 and as above	250 12
		Conservative Group (Cllr)	Rail links within Suffolk need to be updated to the 21st century with potentially more branch lines and stops especially if Ipswich is to rely on the surrounding areas to provide its housing needs. Ipswich is not a big enough town to support or need two large town centre bus stations and this should be addressed.	Comments noted	252 97
	Q31: In which areas should "super surgeries" be	Private individual	Certainly, all areas within Ipswich. The new surgery at three rivers is fantastic and can surely free up some cheap housing and funding for the NHS where the current small surgeries could be converted to housing quickly and cheaply	Comments noted.	246 61

	<p>considered ?</p>	<p>NHS England</p>	<p>NHS England working with the CCG, Local Authorities and local stakeholders has begun to address Primary Care capacity issues in the area and currently have projects to increase capacity underway across Ipswich. These projects vary in size and will initially deliver additional capacity to meet current planned growth requirements to 2021.</p> <p>NHS England and the CCG would welcome further discussions with the Local Authorities with regard to density of development and cumulative growth over the plan period within specific areas, to understand the impact and how this may be mitigated.</p> <p>In line with the Five Year Forward View please replace the use of the description 'super surgeries' with 'primary care hubs' this represents the ambition to provide a range of services from within a single premises or across a number of sites within a locality rather than the sole provision of current GP services.</p> <p>Regarding infrastructure items please replace 'surgeries' with healthcare facilities.</p>	<p>Comments noted regarding preferred terminology. Appropriate contact for infrastructure planning has been achieved for the CCG but following ongoing transformation work further exchange with Ipswich Hospital Trust will be welcomed.</p>	<p>248 94</p>
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		Conservative Group	Super Surgeries should be located in each quarter of the town along the same lines as the current Area Committees. They must be served by good public transport links to decrease the potential alienation of sections of the community.	Comments noted.	252 98
	Q32: Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where?	Suffolk County Council SCC	The Plan will need to consider existing available school capacity and constraints as part of the approach to the spatial strategy and ensure that sufficient land is identified to meet needs for additional or expanded schools. It should also set out a framework for securing developer contributions/land. Specific local issues will exist, particularly in relation to primary schools, but secondary school needs will have to be considered at a strategic level looking across local authority boundaries. The range of spatial options and different scenarios for growth under consideration mean it isn't possible to set out an education strategy at this stage. In recognition of the role of early education in enhancing educational attainment and improving social mobility, the plan should consider how best to provide for early education alongside a growing population. The Plan will need to take relevant steps to support the proper provision of early education facilities to meet statutory requirements.	Comments noted and the Council is aware of the trigger required to facilitate new school facilities and will work with the County Council where necessary.	254 44

	<p>Q33: What kind of outdoor recreational spaces would you like and where should we locate them to reduce pressure on the more sensitive coastal areas? What other measures could be put in place to protect sensitive environments?</p>	<p>Suffolk Wildlife Trust</p>	<p>All areas need sufficient high-quality greenspace, with good connectivity to and through the network.</p> <p>Circular dog walking routes of at least 2.7km with a start point within 400-500m of the properties. Such routes are needed to help ensure that sensitive designated sites (such as the Stour and Orwell Estuaries) are protected from the adverse impacts that can arise from such activities.</p>	<p>Comments noted</p>	<p>250 16</p>
		<p>Suffolk County Council SCC</p>	<p>Public rights of way make an important contribution to Suffolk communities. They encourage travel by sustainable modes and physical activity, support the tourist economy, offer recreational opportunities for residents, give access to the local natural environment and can help manage the impacts of development on sensitive habitats and species. Policies should identify a means of ensuring that development protects and provides for enhancement of the rights of way network, both on-site and off-site cumulatively, at a strategic level. The policy framework should be set out in such a way as to link rights of way to the different objectives they support. The County Council would be pleased to review preferred sites to consider impact on the Rights of Way Network.</p>	<p>The Council has allocated green corridors to provide sustainable travel modes and will continue to protect this as part of the new Local Plan</p>	<p>254 43</p>

		Northern Fringe Protection Group NFPG	Outdoor recreational spaces need to be provided as near as possible to homes for easy access to minimise travel. They need to be located in areas that already have a shortage of any specific type of open space. We agree that protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required.	Comments noted	249 75
		Save our Country Spaces SOCS	Outdoor recreational spaces need to be provided as near as possible to homes for easy access to minimise travel. They need to be located in areas that already have a shortage of any specific type of open space. We agree that protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required.	Comments noted	250 57
		Greenways Countryside Project	Providing high quality open space close to where people live is vital to reduce journeys to more vulnerable sites (eg European Protected estuaries). Increased investment in local parks and open spaces would create a 'better offer' to local residents. Sites of high aesthetic and wildlife value along with popular facilities (eg: cafes, destination play features, dog play areas etc), are most likely to achieve this.	Comments noted	253 45

		<p>On behalf of RSPB</p>	<p>The RSPB welcomes IBC's commitment to the Recreational Avoidance and Mitigation Strategy (RAMS) and to develop a &"Green Rim"; around Ipswich to alleviate recreational pressure on sensitive sites (SPAs).</p> <p>New developments should incorporate wildlife-rich appropriately accessible green space paying particular attention to the needs of dog-walkers and recognizing the wider benefits of protecting and enhancing sites for priority species and habitats. There are wider benefits to residents health and wellbeing to be had too.</p> <p>We refer IBC to https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing as an exemplar case study.</p> <p>We support partnership working to deliver the above.</p>	<p>The RAMS strategy is still under review and a draft will be published in due course.</p>	<p>246 48</p>
		<p>Ministry of Defence MOD</p>	<p>The aerodromes are protected with statutory bird strike safeguarding consultation zones. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety.</p>	<p>Comments noted</p>	<p>248 16</p>

		Ipswich Wildlife Group IWG	Investment in parks, play areas and open spaces helps create much more attractive locations to live. Providing such areas where people live greatly contributes to their quality of life.	Comments noted	248 24
		Suffolk Constabulary	More facilities for young people - especially informal facilities such as skate parks, BMX facilities and undercover areas where young people can safely congregate. On the outer boundaries of housing developments - carefully located to be within natural surveillance of but not a nuisance to surrounding homes and businesses.	Comments noted	248 48
Part 2 Local Questions					
Development Management Policies	Q34: Do you consider any of the development management policies need to be amended? If so, which ones, why and how?	Suffolk Constabulary	Yes. HMO's can put disproportionate pressure onto local neighbours, parking provision and noise, which can lead to conflict. Maintaining a high quality of HMO's is essential to ensure the safety of the residents therein, as well as neighbouring properties. This should be reflected in policy DM14.	Comments noted. HMOs are a legitimate housing type in urban areas and capable of control through planning policy. Although the Police comments deal with some of the recognised issues the Council's Planning control policies are only able to go as far current guidance allows in dealing with these social issues. As there have been no other submissions in respect of the policy affecting the subdivision of family dwellings the current policy is considered effective. The general assumption of 30% as the threshold at which the proportion of HMOs in a street may be considered to be a matter of concern will be retained.	254 99
		Mersea Homes	Our experience in the IGS demonstrates that viability and pragmatic policy decisions are central to securing delivery. Our policy representations over the last decade have continually sought to ensure that policies have been realistically framed to allow them to	Comment noted. The Council aims to produce a plan which has been prepared positively, in a way that is aspirational but deliverable. The Council's policies on affordable housing and sustainable development will be assessed through the local plan review.	254 86

			be met, rather than being expressed as aspirational and then failing to be upheld. We have consistently argued that policies relating to the proportion of affordable housing to be delivered, and to the sustainability standards to be achieved in new built schemes should be expressed on a realistic basis and consistent with national policy.		
	On Behalf of Kesgrave Covenant	DM1 and DM2 will need review to ensure that they fully meet updated national planning policy guidance DM3 - many LPAs provide flexibility in terms of garden sizes to recognise that the standards can be difficult to achieve on mid terraced plots (75 sq. m for a 3 bed mid-terrace unit can produce unhelpfully deep and narrow gardens) and on corner plots, or plots that are well related to adjoining open space. DM30 revisit wording of part (c) in the context of any new residential allocations outside IP One, consider changing 35 dph to provide greater flexibility		Comments noted. The Council intends to review its policies in the context of the new NPPF, 2018 and introduce updates where appropriate.	248 81
	Associated British Ports ABP	CS3 - ABP supports the regeneration objectives for the IP-One area. There are, however, important elements of the Port within or adjacent to this area. New development should, therefore, have regard to these existing uses		The Council acknowledges that Ipswich Port is a significant sector in Ipswich and as such the Council is keen to ensure that proposals for new development adjacent to the site do not compromise existing uses and activities.	250 81 250 81

		<p>and activities so as to ensure that they are protected. We suggest, therefore, the addition of a new criterion into any new policy based on Policy CS3:</p> <p>"New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and where appropriate, expansion of these uses." CS20 - Policy needs to be updated to reflect progress since the DPD was adopted. ABP asks only that any update has regard to and reflects ABP's concerns that any new transport scheme:</p> <ol style="list-style-type: none"> 1) avoids an unacceptable impact on existing vessel access to the Wet Dock via the Lock Pit to the detriment of continued port operations and those of our tenants, commercial businesses and the vitality and viability of the Ipswich Haven Marina 2) avoids any adverse impact (e.g. through traffic congestion) on Cliff Road, which is the primary access onto Cliff Quay 3) avoids any adverse impact on the route for port operational vehicles, plant and equipment between Cliff Quay and the Island Site 4) avoids a routing which would affect the existing railhead into the West Bank Terminal 		
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			5) does not prevent the Port from meeting the stringent security requirements of the International Ship and Port Facility Security Code, and 6) allows for navigation rights along the New Cut		
		On Behalf of East of England Co-operative Society	<p>Boss Hall - We generally support the existing development management Policy DM25 as it provides protection for employment land. However, we also consider that reference should be made to preventing the long term protection of employment land where there is no reasonable prospect of a site being used for that purpose.</p> <p>Prince of Wales Drive - In the context of this question that development management policies relating to areas such as proposals in retail areas are to be amended as a result of more up-to-date evidence in the form of the new Retail and Leisure Study.</p>	Comments noted, however the defined employment areas identified through policy DM25 are currently well used and represent very significant clusters of employers providing job and therefore need to be safeguarded.	253 75

		<p>Suffolk Wildlife Trust (Mr James Meyer)</p> <p>Policy DM4 - could be amended to ensure that all new SuDS are designed to maximise their wildlife value in accordance with published best practice guidance.</p> <p>Policy DM5 and DM6 - could be amended to ensure that the design of new developments secures enhancements for wildlife.</p> <p>Policy DM29 - New sports and recreation facilities can represent significant areas of greenspace, the policy should therefore ensure that such development maximises the biodiversity opportunities of such sites.</p> <p>Policy DM31 - We support this policy, however it may be necessary to update Plan 5 (Ipswich Ecological Network).</p>	<p>Comments noted. The Council agrees that all new development presents an opportunity to make a positive contribution to the natural environment. New housing, SUDS and sports and recreational facilities, can all be designed to integrate space for wildlife.</p>	<p>250 17</p>
		<p>Suffolk County Council SCC</p> <p>The County Council would appreciate the opportunity to review Ipswich Borough Council's development management policies with Borough officers, once consideration has been given to the other comments made in respect of the development of this Plan.</p>	<p>Comments noted, further consultation will be carried out on the first draft local plan in due course.</p>	<p>254 56</p>
		<p>Northern Fringe Protection Group NFPG</p> <p>Yes. The DM policies need to take better account of the major air quality issues affecting Ipswich. Air quality must be improved and all AQMAs eradicated. Development</p>	<p>Comments noted, the Council's intends to introduce a specific air quality policy to allow it to take account of the impact of air quality when assessing development proposals.</p>	<p>249 76</p>

			should not be permitted if it risks worsening air quality.		
		Save our Country Spaces SOCS	Yes. The DM policies need to take better account of the major air quality issues affecting Ipswich. Air quality must be improved and all AQMAs eradicated. Development should not be permitted if it risks worsening air quality.	Comments noted, the Council's intends to introduce a specific air quality policy to allow it to take account of the impact of air quality when assessing development proposals.	250 56
		Suffolk Preservation Society	<p>DM5 only criteria e and f refer to special townscape character and architectural quality-inadequate to deliver high quality design should be more specific and robust. SCDC Design Policy DM21 is a better example.</p> <p>DM34 Countryside - criteria a and g incompatible because a major housing development is unable to respect the character of countryside - defined by low density, sparse housing and open spaces. Fails to specify sequential site selection which supports brownfield before greenfield. Wording of policy fails to include "enhance" when referring to statutory duty with regard to the AONB in line with S85 of CROW Act.</p>	Comments noted. The new NPPF includes an expanded design section, which emphasises that good design is fundamental to the planning process. This re-focusing of national policy, will be reflected in the revised Local Plan.	247 04
			Policy DM8 lacks a positive statement setting out the approach of the management of the historic environment. We refer you to Colchester Borough Council Policy,	The Council is committed to protecting and enhancing the Borough's heritage assets and intends to review its historic environment policy as part of the Local Plan review.	247 10

			DP14: Historic Environment Assets, as a good example		
		Historic England HE	All policies should be reviewed through this process and consideration of the historic environment given throughout the plan to form a positive strategy. Please read this answer alongside our other answers to this consultation, especially Q84. We highlight these particular policies for consideration on how they can be improved: CS4, DM5, DM6, DM8, DM9, DM30. This review is an opportunity to refine the approach to the Waterfront area. The current structure of the IP-One Opportunity Areas and the site allocations has not provided the clarity and vision required or adequately set out the complex historic environment considerations in this area.	The Council is committed to protecting and enhancing the Borough's heritage assets and intends to review its historic environment policy as part of the Local Plan review.	249 17
		On behalf of RSPB	<p>Policy DM6 - Additional line k) to incorporate integrated swift-bricks</p> <p>Policy DM10 - Re-word as Protection and Enhancement of trees and hedgerows</p> <p>Policy DM28 - We question the tone of this policy. NPPF sets out that open spaces should be protected and enhanced.</p> <p>Policy DM31 - needs to include SPAs and SSSIs</p>	Comments noted, the Council is committed to supporting the local wildlife population, promoting increased canopy cover and protecting open spaces and the natural environment. As such the Council will review policies DM6, DM10, DM28 and DM31 and make amendments where appropriate.	247 40

		<p>On Behalf of EDF Energy</p>	<p>Regarding policy CS2, we propose that new development should also be encouraged within sustainable areas and there should be a preference for development on brownfield land. With regard to density, there should also be some flexibility with the application of density standards, depending on the character of the area and accessibility levels. In certain situations, outside of the town centre, it may be possible to achieve higher densities and each site should be assessed on a site-specific basis. This approach is consistent the NPPF (paragraph 17), which encourages effective use of land. Policy CS12 - We support the Council's approach in that the Council recognises that where it is difficult to meet the target for affordable housing provision, a lower amount of affordable housing or different tenure mix could be provided on a site, subject to viability testing in accordance with the NPPF. However, the policy does not provide for off -site affordable housing or commuted payments in lieu of on-site provision. It would be helpful to provide these alternative arrangements within the policy, especially where viability assessments support this approach as a preferred option. Policy CS9 seeks to focus on brownfield land first whilst recognizing that</p>	<p>The Council agrees that there should be a preference for development on brownfield land. The approach to the location of development in policy CS2 maximises opportunities to re-use previously developed land within central Ipswich which reflects the sequential approach to site selection required through the NPPF. The Council will consider clarifying this requirement as part of the Local Plan review. Policy CS12 advises that 'the presumption in favour of on-site provision rather than the payment of commuted sums in lieu of provision'. Again, the Council will consider whether this requires clarification as part of the Local Plan review. The requirements in deleted policy CS9, continue to be expressed through CS2.</p>	<p>250 70</p>
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			<p>greenfield land will need to be developed to meet the Boroughs housing need and forecasted job growth. This policy has been deleted. We therefore request that this policy be included as part of the emerging Local Plan as there is a priority to build on previously developed land, in line with paragraph 17 of the NPPF.</p>		
			<p>Policy CS17 - We request that any infrastructure to be secured or financed from new developments towards the provision of highways and transport; childcare, early years and education; health and emergency services; environment and conservation; community and cultural facilities including heritage and archaeology; sport and recreation; economic development; and utilities are sought in areas where there is an identified deficiency and at a level that ensures that overall delivery of appropriate development is not compromised. This request accords with paragraph 204 of the NPPF which states that planning</p>	<p>Comment noted, both policies will be subject to review.</p>	<p>250 70</p>

			<p>obligations from development sites must be fair, reasonable and proportionate. Policy DM25 does not provide for or set out clear guidance around the grounds upon which the Council will permit the conversion, change of use/redevelopment of sites and premises allocated for employment uses to non B1, B2 and B8 uses.</p> <p>We suggest the Council sets out clear guidance within the policy to permit this only where:</p> <ul style="list-style-type: none"> - 'there is no reasonable prospect of the site being re-used for employment purposes over the plan period; - The proposed use is compatible with the surroundings; and - 6 months marketing evidence is provided to demonstrate the lack of demand for the land' 		
	<p>Q35: Are there new development issues which may warrant the inclusion of new development management policies in the plan? If so, what are they, and what</p>	<p>Associated British Ports ABP</p>	<p>New Local Plan would benefit from the inclusion of a new policy which:</p> <ul style="list-style-type: none"> - Identifies the operational Port estate and its relationship to the town centre and IP-One area. - Supports port development and the growth of the port where this does not conflict with other policies in the Plan; and - addresses the particular development considerations which should apply in the interface area 	<p>Presently DM25 advises that 'it is important to ensure that proposals for new development that would itself be sensitive to the harmful effects of air, noise, vibration or light pollution, are not located where there are or could be such problems'. The Council will consider whether this point requires clarification during the Local Plan review.</p>	<p>250 80</p>

	<p>would the policies need to do?</p>		<p>between the port estate and the town centre and IP-One areas. Such a policy would address the imprecision and lack of clarity of the current draft version of the DPD. Whilst Policy DM25 serves to safeguard existing employment areas, it is important that care is exercised when development proposals are brought forward in the vicinity of these areas (consistent, perhaps, with other policies of the DPD) to ensure that this new development does not prejudice existing employment uses and business operations which are "appropriately located". ABP requests, therefore, recognition in the new Local Plan that it will not apply policies in isolation in exercising its development control functions.</p>	
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		Theatres Trust	<p>Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments.</p> <p>The Trust recommends a policy along the lines of -</p> <p>Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres.</p> <p>Major developments are required to incorporate, where practicable, opportunities for cultural activity to widen public access to art and culture, including through the interpretation of the heritage of the site and area.</p> <p>The loss or change of use of existing cultural and community facilities will be resisted unless</p> <p>* replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or</p> <p>* it has been demonstrated that</p>	<p>The value of the cultural facilities in helping to create a sense of place and community is understood. The Council currently promotes culture and leisure facilities through policy CS14 (Retail Development and Main Town Centre Uses). The Council will consider whether a dedicated policy is required as part of the Local Plan review.</p>	250 00
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			there is no longer a community need for the facility or demand for another community use on site.		
		Historic England HE	Consideration of streetscape, particularly given the issues of connectivity and traffic management is an area for exploration. For streetscape improvements, refer to the Streets for All publications which are currently out for consultation: https://historicengland.org.uk/images-books/publications/streets-for-all/ . They provide updated practical advice for anyone planning or implementing highways and other public realm works in sensitive historic locations. It sets out means to improve public spaces without harming their valued character, including specific recommendations for works to surfaces, street furniture, new equipment, traffic management infrastructure and environmental improvements.	Comment noted, the Council currently considers the public realm and street scene through policy DM5 (Design and Character) and its Space and Design Guidance SPD. The Council will consider whether a dedicated policy is required.	249 37

			Please also see our advice for highways engineers and designers: https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway-engineers-and-designers/ .		
		Suffolk Constabulary	<p>*Policy DM1: Sustainable development.</p> <p>*Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments.</p> <p>*Policy DM5: Design and Character</p> <p>*Policy DM5 paragraph 9.46.</p> <p>*Policy DM8: Heritage Assets and Conservation:</p> <p>*Policy DM12: Extensions to Dwelling Houses and the Provision of Ancillary Buildings</p> <p>*Policy DM14: The Subdivision of Family Dwellings.</p> <p>*Policy DM17 Transport and Access in New Developments.</p> <p>*Policy DM18: Car and Cycle Parking.</p> <p>*Policies DM:20 - 23 Shopping</p>	Comments noted. The Council will review all development management policies as part of the local plan review.	248 49

			centres . *Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities. *Policy DM32: Protection and Provision of Community Facilities.		
Potential Land for Development	Q36: Are there suitable sites which are currently located in employment areas, which we could re-allocate to housing without compromising the remainder of the employment area? (Refers to current employmen	On Behalf of Kesgrave Covenant	Given that employment land allocations have only recently been reviewed in the context of the Ipswich Local Plan, and given also that there is a clear requirement for protecting viable employment land, the scope to reallocate existing employment land for residential purposes will be limited at best (see response to Question 19 under Part A).	Comments noted	248 82
		Associated British Ports ABP	The majority of the operational area of the Port of Ipswich is identified in Employment Areas E9 and E12. Within and surrounding these areas there may be sites which are suitable for other alternative uses and redevelopment (eg for housing). ABP is concerned that any development proposals that may be brought forward in these circumstances are sympathetic to port operations, particularly in	The Council is considering all sites and their suitability through the SHELAA, including areas around Cliff Quay and Holywells Road. These sites will only be allocated for housing where they are compatible with neighbouring uses.	250 84

	t areas map).		respect of the juxtaposition and orientation of new development to ongoing port activity and the potential traffic impacts that this new development may have on already constrained access routes into and around the Port.		
		On Behalf of East of England Co-operative Society	The Boss Hall Industrial Estate is currently allocated as an employment site (E4) and protected under Policy DM25, where it is safeguarded for employment and ancillary uses. The Society is currently preparing a redevelopment/re-use scheme for a package of proposed uses that would provide further employment opportunities (including a variety of smaller B1/B2 units) and an appropriate range of compatible retail and leisure uses on this part of the industrial estate to enhance the current provision and provide additional services for the existing businesses.	Comments noted	253 77
		Suffolk Wildlife Trust	Whilst we do not have any recommendations for employment sites that could be re-allocated to residential use, it should be noted that employment site E15 includes Ransomes Europark Heathland CWS. Consideration of any use types in this area must ensure that the CWS is secured and suitably protected.	Comments noted	250 18

		Private individual	Again I refer to this apparent lack of land within Ipswich's boundary. E14/E17 could have been an ideal location for residential development, however it was used as a low job car sales area. Why? Land either side of West End Road needs to be improved visually (sorry I cannot locate it on the map) the old Marshall Jag site should be used for residential and the tatty car scrap yard as well (on other side of the road). E12 should not be retained. E15 should be retained at all costs as I believe this is a well supported employment zone.	The Council is always considering re-development in relevant areas and West End Road is an area which will be explored through the SHELAA as well as any other redundant employment areas.	246 62
		On behalf of FIS Property and Landex Limited	There are suitable sites which are currently located in employment areas which could be reallocated to housing. One such site is the land at 17-19 Holywells Road, Ipswich (plan uploaded) owned by FIS Property Limited and Landex Limited, within Employment Area 11 (Holywells Close and Holywells Road). The site is currently in use but not used efficiently, having regard to its highly sustainable location within IP-One between the Wet Dock and Holywells Park. It provides an excellent opportunity for redevelopment/part redevelopment to provide both residential and employment development, e.g. commercial/ employment space at ground floor level with residential above. It can be redeveloped without compromising or being	Comments noted and the site referred to will be considered as a potential proposed housing allocation in the new local plan.	248 75

			compromised by the remainder of the employment area.		
		Pigeon Investment Management Ltd	With a high jobs target a wide variety of employment land is needed to provide flexibility in the employment land market. The requirements of businesses vary significantly and to meet the jobs target an over provision of employment land is required. This approach was found sound in the recent local plan examination in the Borough.	Comments noted. The Council is committed to protecting employment sites and employment areas across the town to meet a variety of needs.	253 68
		Conservative Group (Cllr)	Areas 10, 11 & 12 could be considered for housing.	Comments noted	252 99
	Q37: Land is allocated in the Borough as countryside. Should we re-allocate countryside	On Behalf of Kesgrave Covenant	Yes, in accordance with our responses to Part A (and in particular Question 13), suitable development sites on the edge of Ipswich should be reallocated for residential development - specifically the areas shown as H, I and J on the plan showing accompanying Question 37.	Comments noted	248 83

<p>e sites to housing? If not, why not? If yes, which areas? (See map below for details of current countryside areas).</p>	<p>Suffolk Wildlife Trust</p>	<p>We would object to the allocation of greenspaces for new development. As recognised by the council, such areas are essential for the health and wellbeing of residents, the town's biodiversity and wildlife network, climate change mitigation and adaptation and to create an attractive environment.</p> <p>An integrated, landscape scale approach is key to conserving wildlife, even where it is demonstrated that a site is of no ecological value in its own right, it may contribute to the green infrastructure of the area as part of a network.</p>	<p>In the event of allocation, the Council would expect to maintain the green rim and routes for wildlife by introducing planning constraints that cover access, cycling and walking and retention of open space for the purposes of residents' wellbeing.</p>	<p>250 05</p>
	<p>Suffolk County Council SCC</p>	<p>Access to the natural environment and open space improves health and wellbeing by providing opportunities for physical activity, being beneficial to mental health and reducing health inequalities. If IBC does choose to re-allocate open space for housing, the need for people to access the outdoors should still be met. For all sites indicated in the plan, development proposals would need to be considered in relation to policies relating to archaeology. Factors to consider may be that for A, 3 skeletons were found in 1912, which may be evidence of more extensive burial, the site of St Botolphs Church lies between E and F, which</p>	<p>Comments noted</p>	<p>254 55</p>

			may have implications for development, Sites M, N and O are in areas of cropmarks relating to historic settlement.		
		Northern Fringe Protection Group NFPG	No. It is not realistic to release areas of protected open spaces within the Borough to residential development, given the current large shortfalls of Open Space in Ipswich. Continuing protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required. We strongly oppose any attempt to use what little remaining countryside there is in the Borough for homes, especially as neighbouring authorities are using up their countryside adjacent to Ipswich Borough boundaries to deliver large amounts of homes.	Concerns noted. Please see comments above relating to the goals for the green rim and connecting corridor that would need to be maintained in the event of allocation.	249 77
		Save our Country Spaces SOCS	No. It is not realistic to release areas of protected open spaces within the Borough to residential development, given the current large shortfalls of Open Space in Ipswich. Continuing protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required. We strongly oppose any	Concerns noted - please see other comments above	250 55

			attempt to use what little remaining countryside there is in the Borough for homes, especially as neighbouring authorities are using up their countryside adjacent to Ipswich Borough boundaries to deliver large amounts of homes.		
		Greenways Countryside Project	As a general principle, all of these existing 'countryside' areas form part of the 'green rim' concept, providing much needed breathing space between settlements - both for people and wildlife. Comments made on each site, see attached document.	Comments noted.	253 46
		Rushmere St Andrew Parish Council	Rushmere St Andrew Parish Council consider the areas annotated H, I, J, K & L should remain as countryside in order to preserve the very long standing (1997) policy of maintaining the separation of RSA village from the town in order to maintain its own identity. We are concerned about additional traffic that would be generated around the north Ipswich to Martlesham rat run corridor (Humber Doucy Lane, The Street, Playford Road) that would be generated by any further development in the north/north-east corner of Ipswich.	Comments and concerns noted.	248 86
		On behalf of RSPB	No. Any proposal to reallocate countryside as housing, will first need to map the presence of any priority habitats and species.	Practical points noted and welcomed	246 49

			Mitigation for certain farmland bird species, e.g. skylark is likely to be impractical within developments so will need to be secured off-site.		
		Private individual	Again apparent lack of land in Ipswich? Agree P/O/N/M should not be developed as it is the other side of the A14/A12 and would be an odd fit with the town. I can think of no sane reason why E/F/G and H through to L shouldn't be developed especially given the shortage of land in Ipswich. C looks appropriate if the current gypsy site is kept as it is.	Comments noted	246 63
		Ministry of Defence MOD	Parcels A to D fall within the 91.4m height consultation zone surrounding Wattisham airfield: any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office. Parcels E to G fall within the 91.4m height and birdstrike consultation zones: any proposed structures in these areas which may exceed 91.4m or include the development of open water bodies or wetland habitat, refuse and landfill sites need to be reviewed by this office. Parcels H to R are all Sites outside our Safeguarding Areas (SOSA). The MOD has no statutory safeguarding concerns with development within these locations.	Planning constraints noted.	248 17

		Ipswich Wildlife Group IWG	<p>The existing countryside areas form a green buffer between settlements, providing welcome areas of exercise and relaxation for residents and valuable habitat for wildlife.</p> <p>A - A small-scale development that included habitat for reptiles and other wildlife could be part of the desired green rim.</p> <p>B - This area alongside the A14 main wildlife corridor is woodland, therefore unsuitable.</p> <p>C - This area is also in the A14 wildlife corridor and would need a habitat survey to identify existing wildlife value before any development could be considered.</p> <p>D - This is a small area of an arable field - not feasible on its own.</p> <p>E and F - Wildlife and habitat surveys would be needed to establish the value of the site. The site is located in the green rim and a major wildlife corridor, so any development should enhance wildlife value and create new semi-natural open space as part of the green rim (with links to the new Garden Suburb country park).</p> <p>G - This site requires wildlife and habitat surveys. It would be the most suitable extension to the new</p>	Practical points noted and welcomed, please see comments above	248 25
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			<p>Garden Suburb country park.</p> <p>H to L - The hedgerows on this site should be protected. Small-scale development should include a semi-natural open space as part of the green rim.</p>		
			<p>M to O - Currently arable land so there is scope to create new natural habitats and green space that would add to the wildlife corridor and green rim.</p> <p>P - Part of Orwell Country Park and A14 wildlife corridor, so not appropriate for development.</p> <p>Q - Part of Belstead Brook Park and Local Nature Reserve status so not developable.</p> <p>R - Unsuitable as adjacent to Belstead Brook an important wildlife corridor and likely to flood.</p>	As above	

		Pigeon Investment Management Ltd	The remaining areas of countryside are difficult to develop and will not deliver significant housing. The Inspector who examined the adopted Local Plan amended policy DM34 to ensure that proposals for the development of the remaining unallocated countryside around the town would be looked on favourably. Despite making this change to the plan the Inspector still concluded that there was not sufficient land within the Borough boundary to deliver significantly more than the Boroughs interim housing target of 9,777 homes to 2031.	Comments noted	253 69
		Ipswich Limited	Land identified as countryside and open space should remain as is.	Comments noted	254 10
		Conservative Group	E, F & G could be considered for housing.	Comments noted	253 00
	Q38: Land is identified as open space. Should we re-allocate some open space sites to housing? If not, why not? If yes, which ones? (Refers to Areas of Open	On Behalf of Kesgrave Covenant	As a general principle, existing land that has open space value or recreational value should be retained for that purpose. The Council will no doubt review its evidence on existing levels of provision to determine whether or not there are any genuine areas of surplus, but clearly new housing should not be provided at the expense of maintaining reasonable access to open space for existing residents. There is a small area of land at the north-eastern side of the area referenced 35 (fronting on to	Comments noted and the site preferred will be considered for residential development through the Strategic Housing and Employment Land Availability Assessment (SHELAA).	248 84

Space within Ipswich map).		Humber Doucy Lane) which is not part of the playing fields, is private land, and has no current or historic recreational function, which should be removed from the open space allocation (details will be provided separately).		
	Suffolk Wildlife Trust	<p>We object to the re-allocation of open space for housing.</p> <p>The loss of such sites to development would not only result in local biodiversity losses, but would also decrease connectivity and fragment the network of greenspaces throughout the town.</p> <p>The 2012/13 Ipswich Wildlife Audit identified the ecological value of the majority of the greenspaces within the town and provides a good evidence base for the value of these sites.</p> <p>In addition it could significantly increase visitor pressure on other sensitive designated sites, such as the Stour and Orwell Estuaries, by displacing people from the areas they currently use for recreation.</p>	The Council through the Local Plan has committed to put in place measures to manage recreational pressures on the Orwell Estuary.	25006
	Suffolk County Council SCC	Access to the natural environment and open space improves health and wellbeing by providing opportunities for physical activity, being beneficial to mental health and reducing health inequalities.	Comments noted. The Council recognises that green spaces contribute towards local biodiversity, visual amenity and health and well-being.	25442

			Ipswich Borough Council should ensure that if it does choose to re-allocate open space for housing that the need for people to access the outdoors is still met, so that the benefits to health are available to everyone.		
		Northern Fringe Protection Group NFPG	No. There is already a deficit of Open Space across Ipswich and it should not be allowed to deteriorate further. It is worth noting that with the proposed growth under the current Local Plan, the demand for Open Space per head of population will increase further.	The Council recognises that there is a deficit of Open Space in certain areas of the Borough and this has been identified through the Open Space SPD.	249 78
		Save our Country Spaces SOCS	No. There is already a deficit of Open Space across Ipswich and it should not be allowed to deteriorate further. It is worth noting that with the proposed growth under the current Local Plan, the demand for Open Space per head of population will increase further.	The Council recognises that there is a deficit of Open Space in certain areas of the Borough and this has been identified through the Open Space SPD.	250 54
		Greenways Countryside Project	Strongly oppose re-allocation of existing limited open space, allotments etc because of their public and wildlife benefit. Playing fields, if not required for that purpose should be considered for change to wildlife open space to meet increasing needs, especially where located in or near to the ecological network.	The Council comments that Open Space which is not being utilised will always be considered for re-use including for wildlife purposes and this is explored through the allocations process. Notwithstanding this, the Council recognises that green spaces contribute towards health and well-being and is working to protect its existing open spaces, where appropriate, through policy DM28 and provide new open spaces through policy DM2.	253 47

		On behalf of RSPB	<p>The RSPB considers that open space should not be re-allocated to housing.</p> <p>For all ages, &"access to green spaces is associated with better mental and physical health across socioeconomic groups"; (Healthy lives, healthy people: our strategy for public health in England' - Dept. Health White Paper, November 2010; paragraph #3.36)</p> <p>We commend the Council and its partners for mapping the Ipswich Wildlife Network and endorse that Core Strategy policy DM31 sets out that development proposals will be required to have regard to existing habitat features and the wildlife corridor function, through their design and layout, and achieve net biodiversity gains.</p>	<p>Comments noted but some Open Space will need to be explored through the SHELAA for it's suitable for housing development. Notwithstanding this, the Council recognise that green spaces contribute towards health and wellbeing and is working to protect its existing open spaces, where appropriate, through policy DM28 and provide new open spaces through policy DM2</p>	246 78
		Ministry of Defence MOD	<p>Open spaces on the western half of the town fall into the Wattisham station Safeguarding zone aerodrome height 91.4m:</p> <p>9-11, 16, 18-28, 46-54, 57 and 58. The MOD would require consultation for any proposed developments within these zones which may exceed 91.4m in height. Areas on the western half of the town fall into the Wattisham station Safeguarding zones aerodrome height 91.4m and Birdstrike: 1-8, 12-15 and 17. The MOD would require</p>	<p>Comments noted. The Council will consult the MOD on any proposals for tall buildings within the identified safeguarding zones.</p>	248 18

			consultation for any proposed developments within these zones which may exceed 91.4m in height or include the development of open water bodies/wetland habitat, refuse and landfill sites.		
		Ipswich Wildlife Group IWG	Strongly against re-allocation of existing open space, due to the benefits they provide for public and wildlife.	Comments noted. The Council is committed to protecting existing open space and the natural environment through policies DM28, DM29 and DM31.	248 26
		private individual	Open spaces should not be allocated for housing otherwise the character of the townscape will become one long continuous belt of residential building. The townscape needs to be dissimilar through breaking up areas with mixtures of uses and retention of open spaces.	The importance of well-designed residential development is noted and will be encouraged through the Core Strategy to include protection and provision of Open Spaces.	247 77
		Environment Agency	If open space sites are to be reallocated to housing, it is vital that the social, environmental and economic value is not lost. Instead, new housing development can be used as an opportunity to make local areas of open space more accessible. A network of sites is preferable for urban biodiversity, and any reduction will put additional pressure on sites that are more sensitive to recreational disturbance such as the Orwell Estuary SSSI.	Comments noted. The Council is committed to protecting existing open space and the natural environment through policies DM28, DM29 and DM31. Through policy DM29 the Council will ensure that public open spaces are provided through new developments to meet the needs of their occupiers and opportunities will be sought to link green spaces into a more continuous network.	251 78

		Pigeon Investment Management Ltd	To change land such as parks, sports pitches and allotments to housing should be resisted. As the population grows, the facilities and open space have to grow as well. Reducing the levels of facilities and open space while growing the population places strain on existing facilities. The National Planning Policy Framework emphasises the importance of such facilities in section 8 "promoting health communities."	Comments noted. The Council is committed to protecting existing open space, sports and recreational facilities through policy DM28. Open spaces and sports and recreational facilities are essential to the quality of life of Ipswich people and the quality of the town's environment. The Council will ensure that public open spaces and sports facilities are provided through new developments to meet the needs of future occupiers through policy DM29.	253 70
		Ipswich Limited	Land identified as countryside and open space should remain as is.	Comments noted. Ipswich is set within a high-quality landscape which is protected through policy DM34 (Countryside).	254 11
	Q39: Are there other sites in the Borough that you consider would be suitable and available for housing or other development? Please provide details. Please note, sites	Historic England HE	Site allocations: Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. At an early stage when assessing site allocations, it is important to include the impact on heritage assets. See advice note 3. If a site is allocated, we would expect to see reference to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting.	The Council with safeguard existing heritage assets through Policy DM8 and understands the importance of considering the protection of heritage assets through new site allocations.	249 16

submitted through the call for sites exercise do not need to be re-submitted.	Private individual	Not in a place to comment on the majority of the sites. The main parks in Ipswich should be kept at all costs (Christchurch, Hollywells, Landseer). Murrayfield Park should be kept as this is an important area for dog walking without this area this would make dog walkers take their dogs to Landseer Park where they have been a number of dog attacks and a huge amount of litter. Without Murrayfield Park we would drive to a safe park or field which would have impacts on traffic/pollution etc.	Comments noted. Protected Parks and Gardens are never considered appropriate for re-allocation.	246 64
	Ipswich Central	The number of residents living in the town centre has increased, but nowhere near enough. The Plan must help to stimulate new residential development, particularly that differentiated from the high number of apartments currently in existence. Town housing developments throughout the Eastgate and Westgate Quarters should be encouraged.	The Council is considering all forms of development in the IP-One area, including Town Houses which could be built in conjunction with flats to meet the 90dph requirement of Policy DM30.	250 89
	On Behalf of EDF Energy	Land at Cliff Quay is allocated for employment use under Policy SP5 (Ref. IP067). In earlier versions of the Site Allocations DPD, IBC put the site forward for a similar form of development and for 50% housing at low density (50 dwellings) and 50% employment. It would be possible to accommodate housing to the north of the site adjoining the	Comments noted and this area has been explored as part of the SHELAA.	250 75

			existing residential land uses and to provide employment land further to the south adjacent to the employment uses with a buffer zone in the middle. We request that the proposal should be amended to include residential development alongside employment uses.		
		On Behalf of Bloor Homes	Land at and surrounding Hill Farm, Lamberts Lane, Rushmere St Andrew ('the Site') is being considered as a potential development site by Suffolk Coastal District Council as part of its emerging Local Plan, and has been assessed through the Initial Sustainability Appraisal - Site Assessments as site reference 1087.	The Council will work with neighbouring authorities where appropriate and where it has been identified that development could be secured through a cross-boundary arrangement.	252 25
Central Ipswich	Q40: For planning purposes, should we continue with the IP-One approach or align with the Ipswich Vision 'quarters' definitions ? In either scenario, are the	Associated British Ports ABP	ABP has no particular view on whether a continuation of the IP-One approach or alignment with the Ipswich Vision 'quarters' is preferable for planning purposes. ABP would only request that, whichever the approach adopted, the policy approach reflects the matters raised by ABP.	Comments noted.	250 85
		Suffolk County Council SCC	Along with the Borough Council and others, the County Council is a strong supporter of the Ipswich Vision. The County Council welcomes the consideration being given to a better alignment between the Ipswich Vision quarters and the zones identified in the Plan.	Support of Ipswich Vision noted.	254 54

	boundaries and the policy approaches appropriate ?	Historic England HE	The multiple layers of the Ipswich Vision, IP-One areas, and site allocations do not provide a clear strategic direction for central Ipswich. Refinement of approach to provide clarity is essential. This clarity should include consideration of the need to conserve and enhance the historic environment. This is most apparent in the connectivity between the town centre and the Waterfront, which involves a number of designated heritage assets and their settings. We would recommend a review of the Central and Wet Dock conservation area appraisals and their boundaries as part of the evidence base for the new local plan.	Concern regarding lack of clear strategic direction noted. Lack of reference to conservation and enhancement of the historic environment noted, particularly in relation to the waterfront and town centre. Opportunities to review the conservation area appraisals and their boundaries will be explored in the future.	249 38
		Suffolk Chamber of Commerce	If economic and business growth is to occur we believe that the focus on central Ipswich should be extended, especially westward to include Norwich Road as a key gateway to the town, although we support the overriding aim of re-aligning the key routes through the town north to south to strengthen the links between the town centre and the Waterfront. In order to simplify, and provide a clearer statement of intent for, future developments the 'quarters' defined and described under IP-One and Ipswich Vision should be made consistent and probably rationalised.	Options to amend the town centre boundary to include wider areas, such as Norwich Road, will be considered where appropriate. Suggestion to opt for a 'quarters' approach to align IP-One and Ipswich Vision acknowledged.	251 58

		Private individual	Some praise should be given to the improved retail offering in Ipswich over recent years with key retailers coming in and an improved Buttermarket. However there is still a long way to be a truly ambitions town rather than setting for 'it'll do'. I don't really see the need for the different quarters apart from town-centre planning policies, promoting development around the waterfront and seeking national well-paid employers move around Portman Road/Civic Drive area of town.	Opposition to quarters noted. Support for development around the waterfront and Portman Road/ Civic Drive area acknowledged.	246 65
		Ipswich Central	<p>Ipswich Vision 'quarters' definitions should be adopted for planning purposes. The Vision Board should be tasked with assisting with master planning of the Quarters in order that they develop a unique character.</p> <p>Alternative uses should be encouraged within the Eastgate and Westgate Quarters and core retail investment should be concentrated within the Central Quarter, together with a more independent offering within the Saints Quarter. Several buildings/areas within the Central Quarter could be redeveloped to suit modern retail demand for example Upper Brook Street and to bring new occupiers to previously underused sites.</p>	Support of Ipswich Vision Quarters noted. IBC will consult and engage with The Vision Board where appropriate. Recommendation of allowing alternative uses within the Eastgate and Westgate Quarters noted and will be explored as part of review of relevant Local Plan policies.	250 88

		Gladman Developments	Gladman note that consideration is being given to the future policy focus for the regeneration of central Ipswich and that reference are made within the consultation document to the approaches contained within 'IP-One' and the 'Ipswich Vision'. Any policy approach of this nature should avoid being overly prescriptive and instead seek to provide a suitably broad framework within which development opportunities can be brought forward over the plan period that can positively respond to prevailing market conditions to secure the development needed to support regeneration.	Concerns regarding potential narrow approach to policy and need for broader framework acknowledged. IBC recognises the need to respond to market conditions in supporting regeneration and this will be taken into account in the Local Plan Review.	253 87
		New Anglia LEP for Norfolk and Suffolk	New Anglia LEP is committed to the Ipswich Vision and will continue to support the evolution and implementation of the Vision. Through better alignment with the Ipswich Vision, the Local Plan could add significant value to efforts to revitalise Ipswich Town Centre, but it is recognised that the Ipswich Vision and the Local Plan approach the issues in different ways. In developing the Local Plan, the Borough Council should consider how far planning policies and allocations can contribute to the coordination of investment in Ipswich Town Centre, through the Ipswich Vision.	The need for the Local Plan and Ipswich Vision to align, so as to contribute to the coordination of investment in Ipswich Town Centre, is recognised and IBC will work with Ipswich Vision in reviewing relevant Local Plan policies.	252 28

		Ipswich Limited	<p>These quarters are by Ipswich Central - not Ipswich Vision.</p> <p>The policy isn't appropriate because the contents do not remain constant. The goalposts are constantly being changed and there is no consistency or clear vision.</p> <p>There is also too much attempted copycat with disastrous effects. Maybe we should focus on something a bit more bespoke to Ipswich.</p>	Concerns regarding quarters acknowledged. The Local Plan review will explore bespoke opportunities, as well as adaptations of existing visions for the IP-one area, to determine the best course of action.	254 12
Housing mix, affordability and Density	Q41: Should the Local Plan continue to insist on a mix of dwelling sizes and types on each individual site or aim to ensure that we end up with a mix overall, across all development sites in the Borough?	Mersea Homes	We believe that housing mix should be not only driven by housing need, but by the context of the site being delivered. The Council's policies have in the past, and in our view, offered uncertainty because of their approach of seeking to both determine mix and provide exemptions - the result of which is ambiguous policy. In our view, the context of the site should primarily lead the dwelling mix, with tenure mix and dwelling sizes for affordable provision then set within that context.	Concerns regarding the lack of clarity of existing policies in relation to housing mix noted. Support for a site-led approach to determining housing mix noted.	254 87
		On Behalf of Kesgrave Covenant	There is merit in seeking a mix of unit sizes in all developments, to help contribute to the overall achievement of a balanced housing stock, but it also makes sense to be realistic about what type of mix is most appropriate for individual sites, rather than seeking the same mix	Interpretation of a broad approach to housing mix as being overly rigid acknowledged.	248 85

			from all sites. In addition, there is often a mismatch between the mix of housing that SHMAs indicate might be needed, compared to the mix that the housing market demands. Trying to follow SHMA recommendations without flexibility can therefore have an impact on development viability.		
		On Behalf of East of England Co-operative Society	Prince of Wales Drive - We consider that the Local Plan should not necessarily continue to insist on a mix of dwellings sizes and types on each individual site. Housing mix should broadly accord with the most recently published SHMA, the critical element being to ensure that the overall provision across all sites accords with identified needs for the Borough. Different sites will be suited to varied forms of provision, having regard to surrounding and site-specific context, in addition to viability considerations. The Local Plan should refer to the need for ensuring that developments are viable.	Support for broad approach to application of housing mix policy noted. The need for ensuring that developments are viable and suitability of sites to certain housing types acknowledged.	253 78
		Northern Fringe Protection Group NFPG	In general, the Local Plan should continue to insist on a mix of dwelling sizes and types on each individual site, although some flexibility would appear sensible.	Support for continued approach with further flexibility noted.	249 79
		Suffolk Chamber of Commerce	We have no specific comments here, other than that the Plan will need to make adequate and appropriate provision for the required mix of housing given the	Comments noted.	251 59

			overall projected population and employment growth.		
		On behalf of Rentplus	The policies in this Plan should be flexible, aiming to incentivise residential development that integrates well with existing communities and results in mixed and balanced communities. While it may be appropriate to have a mix of house types and sizes on individual schemes, this should be aimed at providing balance within the wider community, seeking to match local housing needs and demands. We recommend that the policies developed for this plan balances these needs.	Comments noted. The Review of the Local Plan will consider the balance of the needs and plan accordingly.	24802
		Suffolk Constabulary	A mix as this creates a better community with a variety of ages and backgrounds.	Support for continued site-based approach noted.	24850
		Private individual	I am strongly in favour of a mix of dwelling sizes and types on each individual site.	See above.	24727
		Private individual	A mixture of dwelling sizes on individual sites appears to be the 'norm' and should be encouraged.	See above.	24778
		Conservative Group	No, the Local Plan should not continue to insist on a mix of dwelling types on each individual site. The Conservative Group prefers the option of an overall mix rather than a case by case basis.	Support for overall mix method noted.	25301
	Q42: Do you consider that 'starter	On Behalf of Kesgrave Covenant	No, employment sites should be retained for employment purposes (as pre our previous responses on this matter). In addition, it would be	Comments noted, the Council is committed to protecting its existing employment areas for employment use.	24887

	homes' should be allowed as an exception on employment areas? Or should 'starter homes' simply be considered part of an overall mix of housing to be delivered on sites allocated for housing?		inappropriate to separate out starter homes from other residential areas, and it is better that these are provided as part of the overall mix of housing on residential sites.		
		On behalf of Rentplus	The Government intends to widen the definition of affordable housing to encourage a greater diversity of housing to be delivered across England to meet a full range of needs. Starter homes continue to form part of this mix, but is also to be read as a small part of a larger array of tenures, including rent to buy. Members of the Government have indicated that the next iteration of the NPPF (expected in early 2018) is to include rent to buy. This, and starter homes, should be considered as part of the response to meeting local housing needs.	Comments noted, the Council is committed to meeting its identified local housing need and provide decent homes for all.	248 03
		Private individual	Starter homes are to be commended but allowing as exception on employment areas surely negates the purpose of a local plan as a tool for planning both for housing and employment. If we nibble away employment sites, why not build on golf courses and parks as well?	Comments noted, the Council is committed to balancing the needs for both commercial and residential property.	247 79
	Q43: Should the threshold for affordable housing provision	Mersea Homes	We have consistently argued that affordable housing targets within the Ipswich administrative area have failed to reflect the viability of development. Whilst negotiations are ongoing and discussions not fully resolved, it is clear that the	Concerns regarding affordable housing level and suggestion for a lower level noted.	254 88

<p>in private market developments or the targets for provision in different parts of the Borough be revised and on what evidence would you base this?</p>		<p>target level of affordable housing will not be achieved within the IGS, at least within initial phases. The Council's own monitoring indicates that targets have not been achieved, other than where the Council's own scheme have delivered 100% affordable housing. Our view remains that the Council's affordable housing targets remain unrealistic and should be set at a lower, achievable, level.</p>		
	<p>On Behalf of Kesgrave Covenant</p>	<p>As per our responses on Part A, the Council may wish to consider whether or not additional strategic allocations on the edge of Ipswich offer a more effective and viable way of delivering affordable housing, and hence as it did with the Northern Fringe, seek a higher proportion of affordable housing on such sites compared to smaller urban sites. The ability of strategic sites to deliver affordable housing more effectively is a factor that supports the allocation of such land on the fringes of Ipswich, to help meet locally arising affordable housing needs.</p>	<p>Suggestion of concentrating affordable housing on strategic edge of Ipswich sites rather than smaller urban sites acknowledged.</p>	<p>248 88</p>
	<p>On behalf of Rentplus</p>	<p>Many households cannot access traditional affordable housing, are trapped in expensive private rented accommodation, and cannot save towards a mortgage deposit. Under rent to buy households save for a deposit while paying an affordable rent, and then purchase the same</p>	<p>Recommendation of a wider choice of affordable housing tenures in affordable housing policy acknowledged and will be considered as part of Local Plan review process.</p>	<p>248 04</p>

			house. Rentplus gifts a 10% deposit. It removes the need for households to move and frees up social/affordable rented housing for those with greater priority needs. The inclusion of a wider choice of affordable housing tenures can assist wider delivery and should be sought in a new affordable housing policy to assist more families into housing that meets their needs.		
		Conservative Group	The threshold for affordable housing in private market developments should be flexible dependant on the nature of the development and should be negotiated with the developers.	Support for a flexible approach to the affordable housing threshold noted and will be considered in reviewing relevant Local Plan policies.	253 02
	Q44: What do you consider to be an appropriate mix of affordable and private market housing in new developments if viability is not a concern?	Private individual	totally dependent on the scheme. the winerack building is going to be almost totally funded by public money, and because of this there should be no reason for the developer to skimp on affordable housing. if there are very important sites that have a great impact on tourism for example then a reduction in affordable housing should be looked at.	Comments in relation to affordable housing and varying circumstances noted.	246 66
		Home Builders Federation HBF	In establishing the appropriate housing mix and level of affordable housing provision, viability and housing needs are a primary concern. We are concerned about question 44: it is impossible to consider mix without viability and the Council can only make a decision based on the evidence it	Concerns regarding viability and the need for flexibility to be applied acknowledged and will be considered in reviewing relevant Local Plan policies.	250 33

			collects. Policies on housing mix, affordability and density must provide certainty about expectations and also a degree of flexibility. When testing plan viability, it is not possible to test all development scenarios. There must be flexibility within the policy to recognise that some development will be made unviable by the Local Plan policies.		
		Conservative Group	To speed up the developments this must be considered on a case by case basis.	Comments noted.	25303
	Q45: Where should additional permanent pitches for Gypsies and Travellers be allocated?	Ipswich Community Media	Well, we are fairly disgusted that the west meadows site will be terminated. Lets face it - it is a fairly bleak site anyway - under pylons - who else would want it - at least it was somewhere - it is a contentious subject at best - why not support it to have better infrastructure and services?	The West Meadows site is an allocated site for Gypsy and Traveller needs in the current Local Plan. The ownership of this site is outside the control of IBC. IBC will need to plan for appropriate provision of Gypsy and Traveller pitches. The Council remains committed to meeting the need for permanent pitches, as identified through the Gypsy, Traveller, Travelling Show people and Boat Dwellers Accommodation Needs Assessment 2017.	25467
		Environment Agency	When allocating additional permanent pitches for Gypsies and Travellers, we support the existing policy CS11, which requires under b.iii. for the site to be 'free from flood risk'. Caravans, mobile homes and park homes intended for permanent residential use are classed as 'highly vulnerable' so are not permitted in Flood Zone 3, require the exception test in Flood Zone 2, and are very difficult to make safe through raised flood levels. Therefore, we consider that this requirement for Gypsy and Traveller	Support for continued reference to 'free from flood risk' in any future review of related policies acknowledged.	25179

			sites to be free from flood risk should be maintained in any new policy.		
		Ipswich Community Media CIC	Gypsies and Travellers should be protected and not discriminated against.	Romany Gypsies and Irish Gypsies are an ethnic group and protected from discrimination or unfair treatment under the Equality Act 2010.	252 49
		Conservative Group	Location is always going to be difficult; but we should insist on more smaller sites rather than larger sites such as West Meadows. Evidence suggests larger sites can cause more problems the larger they get.	Comments and suggestions noted.	253 04
	Q46: Should the current criteria-based policy for assessing applications for Gypsy and Traveller sites be changed?	Ipswich Community Media	Gypsies and Travellers should be protected and not discriminated against.	Romany Gypsies and Irish Gypsies are an ethnic group and protected from discrimination or unfair treatment under the Equality Act 2010.	254 68

	<p>Q 47: Is the approach proving effective or are there residential areas where the number of people living in HMOs is considered excessive? Should the policy approach be continued and if so what proportion of shared dwellings should be permitted in any one street?</p>	<p>Suffolk Constabulary</p>	<p>Yes. HMO's can put disproportionate pressure onto local neighbours, parking provision and noise, which can lead to conflict.</p> <p>Maintaining a high quality of HMO's is essential to ensure the safety of the residents therein, as well as neighbouring properties. This should be reflected in policy DM14.</p>	<p>Comments noted. Houses in Multiple Occupation are a legitimate land use in urban and other areas. They are assessed using an existing policy that suggests a 30% threshold for the proportion of HMOs in a street beyond which the character of the area changes or other planning issues can arise. As there have been no other submissions in respect of the policy affecting the sub-division of family dwellings the current policy is considered effective, but the matter will be kept under review.</p>	<p>248 51</p>
	<p>Q48: Should the Council continue this approach to the density of residential</p>	<p>Northern Fringe Protection Group NFPG</p>	<p>Yes. The current building density requirements should be regarded as a maximum to prevent undesirable high-density developments. Lowering the current density levels will only result in lower quality developments with less open space of which there is already a deficit in most areas.</p>	<p>The emerging plan is likely to retain policies that retain existing policies that guide higher density development to the core of the town. In any event, this will always be a value judgement that measures any proposal against its surroundings.</p>	<p>249 80</p>

	development?	Historic England HE	As we have already noted, we would expect to see high density in the town centre but have a concern that high density should not automatically equate to tall buildings.	A density related policy will be retained as part of the review document. The Council's policy for tall buildings has previously been removed and will not be reintroduced as part of the review process. However, the document will contain design-oriented policies that broadly reflect the HE perspective set out in this response. Please see comment above.	249 39
Employment	Q49: The current Local Plan allows for uses such as small gyms or cafes to provide local services for the workforce, and car showrooms within the Employment Areas. Is this the right approach?	On Behalf of East of England Co-operative Society	Boss Hall - The provision of small scale facilities such as gyms and cafes within employment areas is welcomed as it provides benefits for the existing businesses and employees, and opportunities to diversify and strengthen the offer of these areas. This provides a sustainable approach and encourages less reliance on the private car. It is felt that consideration should also be given to a more flexible approach that would facilitate re-use for a wider range of employment generating uses, where this would reinforce the viability and function of the wider employment area.	Support noted	253 79
		On Behalf of Aquigen	It is entirely sensible to roll-forward the current Local Plan policy to allow local service uses in Employment Areas. Such uses support the viability of large Business and Industrial Parks supporting the needs of the workforce and visitors alike. Other non-B class uses such as car showrooms also provide important inward investment and skilled employment generating benefits for such locations. This has been	Support noted	251 02

			successfully demonstrated by the recent openings on the Site.		
		Private individual	car showrooms are a poor use of land in terms of jobs. this should be refused. In-depth research should be used to see if this is the correct approach - will new cafe's / gyms just take business away from existing ones?	Concern noted. The National Planning Policy Framework 2018 promotes regular review of Local Plans and the matter will be considered as part of the Plan monitoring process.	246 67
		Ipswich Limited	Without the car showrooms Futura Park would be very empty. Ipswich has long been happy to accept whatever it can passively receive, which isn't the best approach for planning, but it is the only way when the borough isn't bold, ambitious and enthusiastic enough. The "Wine Rack" was supposed to have allocation for affordable housing but this has been dropped for a vanity Dubai-like luxury penthouse apartments, all with Â£20m of public funds.	The comments contained in the response are of limited weight in planning policy preparation terms. The planning system functions within a market led (local) economy and may only promote development through a mix of flexible policies and responses to applications in the development management process. There are several sites (in addition to the site mentioned) which illustrate that development economics and individual site viability determine the rate at which development occurs, rather than IBC local plan policies.	254 13
		Conservative Group	Small businesses should be encouraged to provide local services as they can become the lifeblood of the community.	Comments noted	253 05
	Q50: Should all the sites allocated for employment use be	On Behalf of Kesgrave Covenant	No, there is a need for land for both economic growth and housing growth, so converting existing and viable employment land to housing has no net benefit. Clearly there may be small scale changes to employment land allocations to	Support for general principle of protecting existing and viable employment land from residential or other uses noted.	248 71

	protected from residential or other uses?		reflect commercial realities, but as a general principle, it is a self-defeating strategy in the context of the Ipswich economic area.		
		On Behalf of East of England Co-operative Society	Boss Hall - It is acknowledged that Ipswich Borough has a challenging job sourcing additional land for housing within its boundaries; however it also has a responsibility to ensure jobs can be delivered within the Borough. Whilst it may be necessary for some employment sites to be de-allocated, given that they have no reasonable prospect of coming forward for such development, it is also vital for certain employment sites, such as the site at Boss Hall Industrial Estate, to remain available within the Borough. This ensures the provision of a range of sites of different sizes in different locations and of the right quality to attract businesses.	Comments noted in relation to Boss Hall Industrial Estate.	253 80
		Northern Fringe Protection Group NFPG	No. Some flexibility would appear sensible.	Comments supporting a more flexible approach noted.	249 81
		Suffolk Chamber of Commerce	We strongly recommend that sites currently allocated for employment are sustained and that a presumption should be made against their re-allocation for housing. Business growth and not housing growth will be the primary	Support for protection of employment sites from re-allocation acknowledged. Sites allocated for employment and housing will be considered as part of the Strategic Housing Land Availability Assessment which will inform the preparation of the Local Plan Review.	251 57

			driver for a more prosperous Ipswich.		
		Private individual	How about a growth area where there is housing and enterprise space e.g. small/medium sized shared office and workshop space? Try to minimise people's commute. Look at taking space and putting it in clusters, not massive industrial estates but enterprise small business space e.g. on Ravenswood where small businesses could base themselves rather than commute into town by car. Stick facilities such as Basepoint next to residential to encourage people to re-locate business closer to home. My own business is based in Bury St Edmunds. There is no appropriate space in Ipswich to relocate it to.	Comments noted and suggestions regarding clustering of small business space and reducing commute times will be considered in the Local Plan review process. The Ipswich Economic Area Employment Land Supply Assessment is currently being updated and this will provide additional evidence and recommendations on employment allocations and policies.	247 91
		Private individual	Decrease the number of high-rise buildings around the town and number pointless office blocks stand empty for many years.	Comments noted. It is pertinent to note that high-rise buildings are not always for office use but comments regarding vacancy rates noted.	248 35
		On behalf of FIS Property and Landex Limited	Where sites are specifically allocated for new employment use, rather than simply being within defined Employment Areas, then so long as they constitute high quality employment land then they should be protected from other uses. However, secondary employment sites, even within defined	Support for protection of new employment use allocations and relaxing of protection on secondary employment sites noted and will be considered in the Local Plan Review process. The Ipswich Economic Area Employment Land Supply Assessment is currently being updated and this will provide additional evidence and recommendations on employment allocations and policies.	248 76

			Employment Areas, should not be protected from other uses, including residential. Policy should allow for redevelopment of these areas to provide regeneration and for urban land to be used as efficiently as possible, including mixed developments which may be residential-led.		
		Private individual	Yes. If we nibble away employment sites it becomes increasingly difficult to meet jobs targets through the local plan.	Comments in support of protection noted.	247 80
		On Behalf of EDF Energy	We don't consider that it's feasible to continue to allocate the site at Cliff Quay for 100% employment. The allocation for mixed-use development would optimise opportunities with part allocation for residential being an enabler for the site to come forward for development. We understand that the Council has concerns regarding the impact of the water treatment works on potential new housing development. However, we consider that the site can be configured to offset against any potential impacts, taking into account the size and topography of the site and specific measures that can be incorporated into the building design.	Comments regarding suitability of Cliff Quay for mixed-use rather than 100% employment noted. The Strategic Housing and Employment Land Availability Assessment will need to review such as this and determine whether the allocation needs to be updated or not.	250 77

		Gladman Developments	It is vital that the Local Plan continues to identify locations to meet strategic and general employment needs. The area is well placed to benefit from the expansion of the transport and logistics sector. The east of Ipswich is well placed to support this expansion through the delivery of mixed-use urban extensions. Furthermore, Ipswich and the New Anglia LEP area is recognised to have a strong and growing digital technology sector. It is essential that Local Plans create the right environment in which these industries can further develop.	Insights into future employment needs and sectors welcomed and noted. These will be taken into consideration in the formulation of the Local Plan review and in conjunction with any other evidence obtained.	253 91
		New Anglia LEP for Norfolk and Suffolk	Three Space to Innovate Enterprise Zone sites are located within the town; Futura Park (E17 on the plan), Waterfront Island (a mixed-use site) and Princes Street (E7). These sites have strong potential for employment development, as evidenced by the sector summary tables within the recent Ipswich Economic Area Sector Needs Assessment (Lichfields, September 2017, Table 16.4). They are also incentivised for development with Enterprise Zone status. New Anglia would therefore urge the Borough Council to continue to protect these sites for employment purposes.	Commentary and recommendations from the LEP are welcomed and noted. IBC will take these into consideration when determining whether any employment allocations and/or policies need to be reviewed.	252 26

		Pigeon Investment Management Ltd	The sites allocated for employment use should be protected from residential or other uses. With a high jobs target, a wide variety of employment land is needed to provide flexibility in the employment land market. The requirements of businesses vary significantly and to meet the jobs target an over provision of employment land is required. This approach was found sound in the recent local plan examination in the Borough. The recently adopted Local Plan policy CS13 protects land in existing allocated employment areas for employment uses. This should be continued.	Support for continuation of existing policy approach recognised.	253 71
		Ipswich Limited	Yes. The council is very anti-car but this is how we all rely on getting to work when there isn't enough local employment opportunities. Buses do not provide a good service to the door of an out-of-borough employer. This creates relatively unnecessary congestion. Residential development is being forced upon by central targets and there just isn't the allocation of employment zones to cater for the density of planned housing.	Comments noted.	254 14
		Conservative Group	This should be addressed on a case by case basis, but we should consider mixed use developments such as those in Norwich.	Comments noted.	253 06

Q51: Should the Council allocate more employment land than is needed to ensure choice?	Northern Fringe Protection Group NFPG	A degree of flexibility would appear sensible. We note in the current local Plan a margin of 150% has been provided which we consider excessive in view of the shortage of housing land.	View that current margin of 150% is excessive acknowledged. This will be taken into consideration when reviewing the Local Plan.	249 82
	Private individual	No - current strategy is poor so why should you be trusted to over allocate?	Concerns regarding current strategy noted.	246 68
	New Anglia LEP for Norfolk and Suffolk	Whilst it is recognised that sites should not be protected for employment when there is no reasonable prospect of delivery, the Borough Council will be mindful of the need for a supply of employment land and different types of units to ensure that businesses have opportunities to relocate and grow. The New Anglia LEP has a range of programmes to assist with bringing forward development sites and supporting the development of new business uses, particularly in key sectors and specific priority locations identified within the new Economic Strategy for Norfolk and Suffolk (such as Ipswich and Enterprise Zone sites).	Reminder of the need for a supply of employment land and different types of units appreciated. Highlighting of programmes to assist delivery of development sites and supporting new business uses through LEP noted.	252 27
	Pigeon Investment Management Ltd	The recently adopted Local plan allocated more employment land than was needed to ensure choice and this approach was found sound so should continue. There are good reasons for doing this due to the variation of business types and the premises that they would need. A good supply of employment land is	Support of existing approach acknowledged.	253 72

			important to ensure that businesses have choice of premises in order to attract business to the Borough. It is a key ingredient of Ipswich's future prosperity that it sustains its aspirational employment vision and continues to provide a choice of employment opportunities for existing and potential employment businesses.		
		Ipswich Limited	This isn't particularly relevant as the trend is for employers to be within the Ipswich FEA ("Ipswich city") area but not within the Ipswich borough. The next decade will see more business relocate outside the town - some will argue about business rates and others about traffic congestion.	Thoughts on future direction of travel or businesses noted and considered.	254 15
		Conservative Group	No.	Comments noted.	253 07
	Q52: What marketing should we require to prove redundancy of a site for business, industry or storage and distribution ?	On Behalf of Aquigen	We consider that the present Policy DM25 marketing test is appropriate in establishing whether a site is suitable / viable for employment use or not. The marketing period represents an appropriate balance and reasonable time period for demonstrating whether a specific site is required or not. As such, aside from its use for development management purposes, it can inform allocations going forward.	Comment noted.	251 03
		On Behalf of EDF Energy	We consider that 6 months marketing evidence should be sufficient in order to demonstrate the lack of demand for the land. This	Comment noted.	250 76

			approach would be in accordance with paragraph 22 and 51 of the NPPF.		
Infrastructure and Transport	Q53: Is the current system of funding infrastructure effective? Should the Council consider introducing a tariff-based charge to fund infrastructure?	Mersea Homes	The IGS demonstrates that where the Council coordinates infrastructure funding offered through S106 agreements, it is possible for the planning and provision of strategic infrastructure to be undertaken on a comprehensive basis. For large scale strategic developments such as the IGS, this is the preferred mechanism rather than relying on tariffs.	The Council has maintained its commitment to obtaining Infrastructure through the planning obligations process as this allows some flexibility in relation to the economic viability of individual sites.	254 89
		Suffolk County Council SCC	In some circumstances, S106 is the most appropriate way of securing developer contributions, in others CIL is more appropriate. The determining factor is the value to be derived from development against the cost of infrastructure. CIL is useful for the mitigation of cumulative impacts but does not currently function when the total cost of infrastructure will not be supported by the income from the levy. The Borough Council should give close consideration to the potential benefits of implementing of a tariff-based charge, but will clearly need to be mindful of the changes being proposed by Government.	IBC will continue to monitor progress with the delivery of a tariff-based approach in conjunction with its partner authorities in the continuing effort to maximise developer contributions for the public purse.	254 53
		Private individual	The current system is bound up with CIL regulations and too much reliance on section 106 agreements. A tariff based charged is likely to be	Please see comments above	247 81

			easier and more effective and timely.		
		Environment Agency	If a Community Infrastructure Levy is to be adopted, we would welcome contributions towards flood risk infrastructure such as the future maintenance of the tidal barrier and existing tidal and fluvial defences.	The hypothetical request is noted, however, the EA will be aware that if IBC wish to adopt a tariff based approach, then there is a rigorous examination process to determine the extent and size of contributions that are received and dispensed through the process.	251 81
	Q54: How best can we tackle congestion in Ipswich?	Associated British Ports ABP	ABP supports the efforts of IBC and SCC to progress the Ipswich Northern Route Study and to bring forward proposals to secure transport capacity improvements which will benefit strategic and local traffic accessing and egressing the Port.	The Council will continue to support Suffolk County Council's work for the initial design and business case for the Ipswich Northern Route during the early part of the plan period.	250 86
		Suffolk County Council SCC	<p>A variety of measures are needed to tackle congestion in Ipswich. As identified in the Suffolk Local Transport Plan, the key change required in Ipswich is in behaviour, to increase travel by sustainable modes and reduce the use of motor vehicles. Whilst new development will make up only part of total demand on the highway network, our authorities can work to ensure that new development makes appropriate provision in respect of facilities for walking and cycling.</p> <p>Our priorities should be to:</p> <ul style="list-style-type: none"> - Reduce the need to travel - Make efficient use of transport networks 	The local plan review is to maintain the Borough's stance with policies that seek to deliver networks of interconnected public open spaces and cycle routes through them, in an effort to make alternative forms of cross-town movement more attractive.	254 52

			- Improve infrastructure		
		Northern Fringe Protection Group NFPG	A northern relief road to accommodate the IGS development and ease current congestion. Road improvements to alleviate the existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans. No further development if it increases congestion, or worsens air quality, without appropriate remedial measures. Enforce planning conditions about transport infrastructure/travel plans. Better sequencing of traffic lights and pedestrian crossings. A roadworks permit system. Specific walking/cycling measures e.g. improving cross-town cycling infrastructure. Allow cars to use bus lanes outside peak times. Reinstate Norwich Rd Park and Ride. Assess the viability of direct cross-town bus routes. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station at Futura Park.	Comments noted. Most of the individual elements of the package of measures raised in the submission are under current consideration. Following new national guidance, Suffolk County Council will be introducing a roadworks permit scheme. The opening of bus routes to general traffic has been trialled, but as a result of some misunderstanding on the part of road users, the scheme was not confirmed. Although there are no plans to reopen the Bury Road Park and Ride due to financial constraints on subsidies, the Council (as the owner of the site) has preserved the operational elements of the facility and will safeguard them for the future. The Westerfield Station improvements will be resolved as part of the IGS development and the Council remains supportive of capacity improvements for the Ipswich to Felixstowe line which will need to be agreed by Network Rail. The provision of a new station at Futura Park is considered unlikely on the basis of cost. The Northern distributor road will not be required to facilitate the delivery of the IGS as (with junction improvements in the area) the existing road network has the necessary capacity. The Northern distributor road will need to be agreed as part of a more significant development package that will be comprehensively planned in future review stages.	249 83

		Save our Country Spaces SOCS	<p>Road improvements are needed to alleviate existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans. No further development if it increases congestion, or worsens air quality, without appropriate remedial measures. Enforce planning conditions about transport infrastructure/travel plans. A roadworks permit system. Specific walking/cycling measures e.g. improving cross-town cycling infrastructure. Allow cars to use bus lanes outside peak times. Reinstate Norwich Rd Park and Ride. Assess the viability of direct cross-town bus routes. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station at Futura Park.</p>	Please see comments above.	250 52
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		Suffolk Chamber of Commerce	<p>We hope that the Council will continue to support the Suffolk Chamber-led No More A14 Delays in Suffolk campaign which advocates improvements to, amongst others, Junctions 53 (Whitehouse), 55 (Copdock), 56 (Whersted); 57 (Ransomes); and 58 (Seven Hills). In that context the Plan should identify, where necessary and possible, opportunities for the Council to 'mesh' with any proposals emerging from Highways England or the highways authority.</p> <p>The Suffolk Chamber of Commerce strongly supports proposals that will evaluate, alternative routes round and through Ipswich to alleviate congestion including the Upper Orwell Crossings, a Northern Bypass and solutions to the heavily-congested gyratory and bottlenecks into and out of town such as the A1156, A1189, A1214 and A1071. Likewise we wish to see more careful forward planning of the infrastructure necessary to service new developments sites for example at Futura Park and Ransomes Europark.</p> <p>We support the introduction of innovative transport and parking solutions to tackle congestion and stimulate footfall such as the continuation (or re-establishment, at</p>	<p>Comments noted - the Council supports the campaign for measures to promote the free movement of traffic on the A14. The Upper Orwell Crossings are currently under review by the County Council and the Northern Distributor route is at an early study stage considering the possible options. Although there are no plans to reopen the Bury Road Park and Ride due to financial constraints on subsidies, the Council (as the owner of the site) has preserved the operational elements of the facility and will safeguard them for the future.</p>	251 62
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			ASDA) of simple and affordable park and ride schemes, more customer-friendly car park charging schemes, bus timetabling better synchronised to business needs and improved routes and facilities to encourage cycling.		
		Private individual	How about a growth area where there is housing and enterprise space e.g. small/medium sized shared office and workshop space? Try to minimise people's commute. Look at taking space and putting it in clusters, not massive industrial estates but enterprise small business space e.g. on Ravenswood where small businesses could base themselves rather than commute into town by car. Stick facilities such as Basepoint next to residential to encourage people to re-locate business closer to home.	Comments noted. The concept of placing homes near to or alongside places of employment (often referred to as Live/Work spaces) remains a useful method of reducing the volume of commuter traffic. Existing policy terms are able to deal with these proposals in a positive way and an individual policy would not be necessary.	247 92

		East Suffolk Travellers Association	As the document states, 'Creating roadspace is not the only solution.' Future growth of employment and leisure facilities must take into account how easy it is to access these by train and/or bus. Better access by public transport to key destinations on the periphery, e.g. the hospital, Ransomes Europark and Whitehouse Employment Area, must also be addressed. The document also refers to the future role of electric vehicles. These may indeed have a role to play for all or part of a journey. However, electric cars must not be seen as panacea for all problems, because they still cause congestion.	The aims of the response are broadly supported in the existing policy and allocations of the plan. While bus services have been created to connect centres around the outside of the town centre (i.e. without having to enter the town centre) these services have not proved sufficiently well used and have been run on the basis of public subsidy. In the absence of financial support these services have not been maintained.	248 12
		Private individual	Promote sustainable transport modes. Get Suffolk C.C. to send buses to places where people actually want to go. A reliable train service between Derby Road Station and Felixstowe could be a massive plus point but trains appear to be cancelled more often than not! Reduce car parking spaces. Charge businesses a tax on car parking spaces they have for their employees which can then be used to promote cycling and bus services. this also encourages businesses to get their staff to use the bus etc.	The Ipswich to Felixstowe route is shared by goods trains and a passenger service. Network Rail are currently increasing the capacity of the line to allow more goods trains to run and the additional "space" generated on track as a result should allow passenger trains to run more reliably. In respect of your suggestion to 'charge businesses a tax on car parking spaces they have for their employees', the power to introduce a workplace charging levy rests with Suffolk County Council. For bus commentary please see above.	246 69
		Suffolk Constabulary	Provide more park and ride options (i.e. re-open Bury Rd, even if only for peak periods).	Please see response on line 445	248 57

		Private individual	Strategies are needed to restrict the number of vehicles entering and moving about near the city centre. These should include a drastic reduction in the number of parking places available for visitors or commuters (there should be a more effective scheme for residents that grants a sufficient number of parking spaces for resident permit holders, electric vehicles and blue badge holders). The current parking system in Ipswich seems to deliberately encourage motorists to drive into the city centre, and unfortunately it is very effective. At the same time, the offer of sustainable transport needs to be improved.	The Council's car parking strategy runs alongside planning and other transport initiatives. To help restrict demand for access no new long-term car parks are proposed for the town centre. The Council is also considering the use of the existing car parks being made available for local residents parking in the non-peak hours. New policy revisions will provide for an increase of electric charge parking bays.	247 28
		Ipswich Central	Priority and focus should be given to key pedestrian and cycle routes throughout the area. These are Princes Street from the town centre to the station; Queens Street, St Nicholas Street and St Peters Street to the Waterfront; Tacket Street and Fore Street through Blackfriars to the Waterfront; and links from the Station to the Waterfront within the Riverside Quarter. This 'triangle' of movement, including links to Christchurch Park, are illustrated within the Vision document.	Comments noted. The local plan recognises the importance of the areas indicated in the submission as they are important links in the network of spaces and green open spaces which the Plan seeks to develop to provide encouragement for cycling and walking across the town, generally. The Council will utilise the emerging Public Realm SPD to help roll out the current round of town centre improvements, as opportunities arise, in an effort to form attractive connections between the different parts of the town.	250 94

		Ipswich Limited	<p>Congestion can be tackled with many common sense tactics:-</p> <ul style="list-style-type: none"> * By not adding to it. * By not reducing existing road capacity (i.e. not moving back stop lines, not adding large ASL boxes on routes cyclists don't use, not adding in so many sets of lights on the gyratory). * By not bolting on supermarkets, retail parks and fast food outlets on to busy A-road junctions. * Widening the A1214 London Road so two lanes into town * By upgrading roads and building new infrastructure 	Comments noted	254 16
		Conservative Group	Ensure IBC & SCC have the same objectives for transport and are working towards the same goals rather than working against each other for political reasons.	Comments noted	253 08
		Private individual	In 2036 I would like Ipswich to have celebrated several years of the roads being cycle safe with designated lanes separated from electric vehicles, primarily public transport and essential services.	The Council with work with its partner agencies towards these broad objectives.	255 29
		Private individual	Have better traffic management between Sainsbury's Garage and the Mermaid.	These interconnected junctions are managed as part of an integrated system that is kept under regular review. The flow through them is monitored constantly and may be changed to suit the needs of the local road network.	255 14

		Private individual	Solve the inner ring road traffic	The Inner Ring road is also managed as part of a town wide system but further improvement is now dependent on the delivery of other schemes that can relieve traffic pressures from other parts of the town.	255 23
		Private individual	Traffic improvements to allow free flow around the town.	As above	255 25
	Q55: How can sustainable modes of transport be encouraged?	Associated British Ports ABP	The Ports NPS recognizes shipping as a sustainable mode of transport. The identification of the Port of Ipswich as a strategic transport hub and the inclusion of policy (ideally) and wording which specifically seeks to support and protect the function and role of the Port in the town, as suggested in our response to Question 30 above, would encourage this form of sustainable transport.		250 87
		Sports England	Sport England supports the development of sustainable modes of transport such as walking and cycling, as they increase levels of physical activity in the population. Sport England would encourage IBC to develop a sustainable transport plan for the Borough to help develop existing infrastructure and prioritise investment.	Comments noted	248 78
		Northern Fringe Protection Group NFPG	Implement specific walking/cycling measures e.g. improving cross-town cycling infrastructure. Cycling needs to be made much safer. Improve air quality in and around the town centres, to make it healthier to walk/cycle. Traffic regulations should be better enforced to prevent vehicles blocking cycle lanes.	Please see comments above	249 84

			Assess the viability of direct cross-town bus routes that avoid the need to go into the town centre. Bus service frequencies in some areas are lower than is desirable. The Norwich Rd Park and Ride should be reinstated. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station at Futura Park.		
		Suffolk Chamber of Commerce	<p>Bus incentives need to be considered to encourage better use of public transport to prevent congestion from driving visitors away to out of town shopping centres or to other towns.</p> <p>We support proposals that create better links between the retail centre and both the railway station and the Waterfront.</p>	Comments noted however, fiscal measures in support of public transport cannot be influenced by land use planning policies.	251 64
		Private individual	<p>The main part of town has no capacity for more vehicles. The town is not too large for cycling but it needs to be made easy for people. Redevelop the cycle network e.g. a direct route into town from the east. Encourage people to cycle from a to b instead of drive by giving them a serious credible option: a proper lane that is smooth, flat and separate from traffic. Not by a kerb but clearly coloured and defined and properly made. Put in the infrastructure properly and the cyclists will come.</p>	The Council in conjunction with its partners will continue to consolidate cycling (and walking) initiatives that strengthen the network of routes.	247 85

		Private individual	Renewable energy seems to be not only the new trend, but a promising and sustainable future technology. Ipswich town centre has a scale that can support cycling and the use of electric vehicles. The current infrastructure needs to be improved, but mainly create a coherent route where people feel safe and tempted to cycle or walk to work. For further routes, electric cars and buses seem promising but you also need to think about charging stations.	Comments noted.	247 98
		East Suffolk Travellers Association	Future growth of employment and leisure facilities must take into account how easy it is to access these by train and/or bus. Better access by public transport to key destinations on the periphery, e.g. the hospital, Ransomes Europark and Whitehouse Employment Area, must also be addressed. The document also refers to the future role of electric vehicles. These may indeed have a role to play for all or part of a journey. However, electric cars must not be seen as panacea for all problems, because they still cause congestion.	Please see comments above	248 13
		Private individual	Restrict the number of vehicles approaching the town centre by a) increasing park and ride facilities at the town border, b) drastically restricting parking space available to non-residents in the town centre, c) improving public transport. If the new vehicle bridge can be used	Please see comments above	247 30

			wisely to draw traffic away from the gyratory system AND bold initiatives are taken to reduce vehicle numbers and shift usage to more sustainable modes, the highly commendable Waterfront Town Centre dream could become reality. There must be methods to stop traffic being drawn in from the A14 (height/weight restriction for the new bridge? diesel surcharge?)		
		Conservative Group	Cheaper parking for electric vehicles and more charging points. Potential for tax breaks to employers who promote sustainable transport for their employees.	Policy revisions expecting new Electric Vehicle Charging Spaces in development are included in the emerging plan. The County Council is able to respond to green travel plans but the IBC cannot influence taxation policy in the manner envisaged.	25309
		private individual	Expansion of the shuttle bus service to all leisure centres and commercial services.	The shuttle bus service has a specific function and a limited service route. Further expansion of this service which is subsidised (from a fund derived from parking fees paid by members of IBC staff) is not appropriate as the subsidy cannot be extended and the offer of free bus services would be affecting the working of the local enterprises which offer commercial services locally against competition regulations.	25519
		private individual	Promote cycle routes.	Please see comments above	25524
		private individual	Have a cycle track and footpath from Stowmarket to Ipswich Waterfront.	This is a highway maintenance issue within the control of SCC	25513
	Q56: What changes, if any, would you like to see to the gyratory?	Suffolk County Council SCC	The County Council as Highway Authority will work with partners to consider what changes to the gyratory are necessary or desirable to improve connectivity between the town centre and Waterfront, based changes in traffic flows arising from the delivery of the Upper Orwell Crossings. There may be	Comments noted	25451

			opportunities for local environmental improvements and better cycling connectivity between the east and west of the town.		
		Historic England HE	The Star Lane and College Street / Key Street gyratory impacts heavily on the historic environment. It severs connectivity between the town centre and Waterfront, and directly impacts on listed buildings and scheduled monuments and their settings. Improving the current situation is critical to successfully regenerating and knitting back together these historic parts of Ipswich.	Comments noted - Heritage England will be consulted on applications and initiatives for the improvement of the public realm in the area identified.	249 40
		Private individual	Stop filtering buses from East Ipswich up to Tower Ramparts - get a better mix of Tower Ramparts / Central Ipswich / Ipswich Train Station	Traffic management and bus routing may not be addressed in local plan policy.	246 70
		Private individual	The gyratory system needs to be safer for vulnerable road users (cyclists, pedestrians and especially wheelchair and other users with disabilities).	Comments noted	247 31
		Ipswich Central	The Star Lane gyratory system presently restricts and endangers pedestrian and cycle routes to and from the Waterfront. It should be rethought with the primary aim of improving the vista through to Waterfront and of creating a sense of arrival rather than a barrier.	Comments noted	250 93

		Ipswich Limited	<p>Ipswich Vision were due to have published a plan for the Star Lane gyratory this year. Ipswich Borough Council tendered out an opportunity for public realm improvements.</p> <p>Star Lane gyratory was never going to be suitable, the future for this area would consist of giving better alternative routes. Public transport isn't a solution as the AQMA monitoring station on Fore Street which is heavily used by buses was at dangerous high levels and much higher than other areas used by lorries, vans and cars.</p>	Comments noted - further options will be considered during the plan period but these will be linked to the decisions taken concerning the Upper Orwell crossings.	254 17
		Conservative Group	Continued support for the Upper Orwell Crossings as they have the potential to allow changes to the gyratory that would benefit the town as a whole.	Support noted.	253 10
	Q57: What new transport infrastructure or services do you think are needed to support further growth in Ipswich?	Suffolk County Council SCC	The Upper Orwell Crossings offer enormous benefits for growth and development in Ipswich. Our authorities should work together to consider how the Local Plan might support the realisation of some of the benefits identified within the business case for the bridges. Other than the Upper Orwell Crossings, our authorities should work together to promote sustainable transport infrastructure and measures for increasing the quality of sustainable transport routes and permeability by sustainable modes. For example, there are several locations where	Comments noted	254 50

			new pedestrian and cycle bridges could overcome barriers to movement, such as Bull Road and the Rosehill Centre, or over the River Gipping between Hadleigh Road and Sproughton Road.		
		Northern Fringe Protection Group NFPG	A northern relief road is required to accommodate the IGS development and ease current congestion. Road improvements are required to alleviate the existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans and test remedial measures identified. No further development if it increases congestion, or worsens air quality, without appropriate remedial measures. Transport assessments for new developments and implement planning conditions about transport infrastructure/travel plans. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station in the vicinity of Futura Park.	Traffic management, junction improvement and other efforts to improve highway capacity have meant that the IGS can be delivered without the necessity of the Northern distributor road being brought forward. Air quality protection has been addressed in the formulation of a new draft policy.	249 86
		Save our Country Spaces SOCS	Road improvements are required to alleviate the existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans and test remedial measures identified. No further development if it increases	As above	250 51

			congestion, or worsens air quality, without appropriate remedial measures. Transport assessments for new developments and implement planning conditions about transport infrastructure/travel plans. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station in the vicinity of Futura Park.		
		Suffolk Chamber of Commerce	There is an urgent need for the provision of a taxi rank on the Waterfront, for both business development and public safety reasons, and this is a long overdue promise of the public authorities.	The Council will continue to negotiate within the constraints of land ownership for a Taxi rank for this area.	251 65
		Private individual	Ipswich is very wide in comparison to other towns. This does not help in making the whole town accessible. Go north, put the infrastructure in and build the northern route. [See also response to Q4 regarding cycling infrastructure]. It is probably too late now, but there's a lot of remodelling of the junctions around East Ipswich; I wonder if any consideration for cycles has been put into those?	Please see comments above	247 89
		East Suffolk Travellers Association	Improvements are needed to the local rail network. Atkins, consultants to East/West Rail, are putting the case for an increase in train service frequency into Ipswich from Bury St Edmunds and Felixstowe. This will require additional platform capacity at Ipswich and double-tracking the	Please see responses above. Council supports east to west rail improvements - some of the enhancements are beyond the scope of the plan and require regional coordination.	248 09

			Felixstowe line. The proposed Ipswich Garden Village should benefit from a relocated Westerfield station served by more trains than at present. East Suffolk Line capacity should be enhanced to enable half-hourly services to Woodbridge and Saxmundham, and provide Woodbridge with a more attractive service into Ipswich. Ideally, the entire section from Woodbridge to Saxmundham should be re-doubled.		
		private individual	Re-open the park and ride. Put in links to the hospital from each of them, reducing the need for so much parking at the Hospital, allowing the Hospital to develop and giving the staff a place to park. Replace 90% of pedestrian crossings in town with footbridges over roads. Reduce the number of traffic lights to allow freedom of movement. Increase the number and quality of cycle lanes by making sure that the road surfaces are suitable for bikes. Reduce the number of cycle lanes on paths. Maintain and repair sleeping policemen or find more effective ways of reducing speed.	The Park and Ride Bury Road site has been purchased by the IBC who have retained the key infrastructure should the service need to be reinstated. Other suggestions are likely to be prohibited by cost, but speed reduction measures are under constant review along with other traffic management measures.	248 33
		NHS England (NHSE) and Ipswich and East Suffolk	We would support a design policy that promotes social inclusion, particularly for the ageing population and provides easy access to local services, without the use of a private vehicle.	Comments noted	248 99

		Clinical Commissioning Group. (CCG)	<p>We would also request that consideration is given to design of access within new developments for blue light services.</p> <p>We would like to highlight that in order for the NHS to introduce new ways of working and increase capacity in, and access to, primary care it is vital that our infrastructure is serviced by adequate public transport systems and communication infrastructure.</p>		
		Private individual	It makes sense to invest now in Hybrid Electric and Pure Electric vehicles. Ipswich can benefit from grants and schemes that may have dried up by the time investment becomes obligatory in 2040. In addition, if infrastructure is installed on new developments now, it removes the potential future cost of retrofitting.	The Council will include an EV Charging Point policy to encourage the availability of top up points.	247 36
		Private individual	A trolley bus route for central area - going to Station, Shops and Waterfront	Comment noted	247 50
	Q58: What type of transport infrastructure for the future, such as electric charging	Suffolk County Council SCC	Our authorities should plan for changes in transport, with a focus on encouraging sustainable and low carbon travel. Particularly in Ipswich, where journeys may be shorter than in the rural areas, our authorities should work towards an alignment of standards and design approaches.	Noted.	254 49

	points, should we plan for?	Private individual	Renewable energy seems to be not only the new trend, but a promising and sustainable future technology. Ipswich town centre has a scale that can support cycling and the use of electric vehicles. The current infrastructure needs to be improved, but mainly create a coherent route where people feel safe and tempted to cycle or walk to work. For further routes, electric cars and buses seem promising but you also need to think about charging stations.	The Council has invested in the provision of 28 electric vehicle charging points in the new Crown car park and is also intending to provide these in the Elm Street car park. Once the level of use of these has been evaluated, a decision on the potential provision of additional electric vehicle charging points elsewhere can be considered.	247 97
		Private individual	<p>See my answer to Q57 for the case for installing charging points now rather than in the future. Here are the main proposals:</p> <p>IBC to fit EV chargers to a percentage of all council-owned parking spaces;</p> <p>IBC to require builders of large commercial properties to provide EV charging, e.g. chargers at supermarkets, shopping centres, workplaces, etc.</p> <p>IBC to require builders of residential estates over a certain size to provide for future EV charging at home by the residents.</p> <p>IBC to investigate options for providing &"on street"; residential charging infrastructure to terraces where off street parking is not available.</p>	The Council has included EVCP in development management policy alterations and has previously adopted the Suffolk County Council guidance for Parking 2015 that also deals with charging point issues	247 37

		Ipswich Limited	<p>A Northern Bypass is long overdue. A single-carriageway solution would be over capacity within months of opening, therefore a dual carriageway road is required to support further growth. An Ipswich Orbital will help with the housing, retail, commercial and industrial developments in the northern arc of Greater Ipswich.</p> <p>Suffolk Highways could allocate more resources to finish projects on time. Currently the same staff work on numerous projects in the area (even outside Ipswich) and it is unnecessarily damaging for the town.</p>	Suffolk County Council are giving consideration to the provision of a new 'northern route' road and this is of particular interest to the Borough Council.	254 18
Q59: What should be the approach to planning for long stay commuter parking and short stay shopper parking in central Ipswich?	Ipswich Community Media	Not having unnecessary new charges stuck on (i.e. - the Norwich road car park being till 8 now - I mean, you can park on yellow lines from 6).	The extension of charging hours on the Council's South Street car park has made it consistent with the Council's other off-street public car parks. Decisions on the time at which on-street parking restrictions apply rest with Suffolk County Council as the Traffic Authority.	254 69	
	Suffolk Chamber of Commerce	Multi storey car parks should be located as near as possible to those shopping zones highlighted as prime and underground parking facilities in flood free zones should be considered under any new multi storey building.	The Council is currently working with Suffolk County Council on a Parking Strategy for Ipswich and it is hoped that the issue of the location and size/type of new public car parks will be addressed as a result of work arising from this.	251 63	
	private individual	I feel there are many short stay parking spots in a 10-15 minute distance from the town centre, so my comment would not be with adding more, but with finding ways to encourage people using them more. Lighting, a green route, and	As above	247 99	

			cafes along the way would be some ideas to help with this.		
		Private individual	The current system encourages long stay commuter parking and short stay shopper parking in central Ipswich. This is a mistake. It results in congestion and pollution and has made the town look like a permanent car park. I should like to see permit-holder schemes introduced for residents in the town centre and in the areas south of the river, adequate spaces for blue badge holders and electric vehicles. Overall there should be a reduction of the number of parking spaces available.		247 32
		Conservative Group	Short Stay parking in IBC car parks should be cheaper to encourage more visitors.	The charges set by the Council for the use of its town centre short-stay car parks are carefully balanced in order to try and ensure that they support the economy of the town centre whilst not seeking to encourage traffic that could use other more sustainable modes of transport owing to concerns over traffic congestion and air pollution. The Council provides some of the cheapest public car parking in Ipswich.	253 11
		Private individual	I think the town would also benefit from more free parking, it is far too expensive at the moment. Pay and display car parks are also a bad idea, they discourage people from staying, shopping and eating in Ipswich, as they are always rushing back to the car to avoid a ticket.	As above.	255 26

Q60: Is the boundary of the Central Car Parking Core in the right place?	Suffolk County Council SCC	The County and Borough Councils are already working together to consider potential answers to these questions. Car parking provision needs to strike a balance between supporting the vitality of the town centre and managing congestion. As part of this ongoing work and based on the opportunity afforded by the Local Plan review, the Borough Council should reconsider the boundary of the central car parking core and how it relates to, for example, employment development in the Princes Street area.	The boundary will be made after the Ipswich Parking strategy has been finalised and this matter will be kept under review.	254 41
	Private individual	I have read the principle behind the Central Car Parking Core and disagree with the principle. Parking in this area should be restricted to a) residents, b) blue badge holders, c) electric vehicles, d) car-sharing vehicles. Of course, there should be allowances for loading for the businesses in this area.	The Council accepts the importance of restricting long stay in the heart of the town centre, it is necessary to allow some short stay public parking to support the economy of the town.	247 33
	Ipswich Limited	Not at all. If the town centre is ever going to survive (let alone thrive) we need car parking capacity to support it.	Comments noted. The Ipswich Parking strategy will continue to seek additional parking provision.	254 19
Q61: Are additional car parks needed to serve town centre shops or leisure	Suffolk County Council SCC	The County and Borough Councils are already working together to consider potential answers to these questions. Car parking provision needs to strike a balance between supporting the vitality of the town centre and managing congestion.	As above	254 48

	facilities? If so, where?		As part of this ongoing work, and based on the opportunity afforded by the Local Plan review, the Borough Council should reconsider the boundary of the central car parking core and how it relates to, for example, employment development in the Princes Street area.		
	Private individual		Car parks are plentiful within the town. Why not turn a number of the car parks into multi-storey car parks and build on the other car parks? Cheap car parking is plentiful in the town. A reduction in the number of car parking spaces could seek to promote sustainable modes of transport reducing the traffic in the town. [N.B. Comment duplicated from Q20 to ensure it is also picked up under car parking].	As above	249 53
	Private individual		Yes, at the various access points to the urban area (Park and Ride). Where possible these P&R access points should be increased and improved. (Incidentally, it might be of interest to have car-share and EV hire schemes running from these points.) With reference to my previous comment for this question, I want to make it clear that I think that no additional car parks should be built close to the town centre. I think that existing Park and Ride facilities should be extended, and new Park and Ride facilities should	Comments noted	247 34

			be created at key entry points close to the A12 and A14.		
		Ipswich Central	Whilst issues of congestion are noted, Ipswich must be seen to be 'open for business' for the car-borne visitor. We believe that the number of poor quality, temporary car parking sites should be restricted and that opportunities for quality, often multi-storey, provision stimulated. Ideally, the town would have four major car parks, one within each of the Eastgate, Westgate, Central and Saints/Waterfront Quarters.	The Council has a policy to prevent the introduction of new temporary car parks within the central car parking core area.	250 92
		Ipswich Limited	Full retention of existing car parks including temporary (pending suitable change of use).	Existing temporary car parks have mostly had any renewal application permitted provided that the appropriate facilities are installed.	254 20
Town, District and Local Centres	Q62: Do you agree that the town centre and Central Shopping Area boundaries are drawn in the right place? Which	Private individual	Norwich Road is a GIFT If we were in Norwich they would know this - they capitalise on such brilliant diversity and support it - let's celebrate it and bring it in to the BID areas etc. Support the Norwich Road development projects - whilst maintaining the unique and diverse quirky appeal (i.e. - NO gentrification).	Comments supporting Norwich Road noted. Whilst not part of the Central Shopping Area, Norwich Road is defined as a District Centre in the current Local Plan (2017). Nevertheless, these comments will be considered in any review of the Central Shopping Area as part of the Local Plan review process.	254 70

	streets would you like to see included within the Central Shopping Area - or excluded from it?	Ipswich Community Media	The Suffolk Chamber of Commerce in Greater Ipswich Board supports the continued development of the Waterfront as a significant cultural and leisure hub and economic driver for the town.	Support for the Waterfront noted. The Waterfront is not part of the existing Central Shopping Area, but this will be borne into consideration in reviewing whether the boundaries need to be amended as part of the Local Plan Review.	251 67
		Suffolk Chamber of Commerce	Norwich road is the most vibrant road in the town centre. This should be celebrated and invested in.	See response to Ref 25470 above.	252 50
		Ipswich Community Media CIC	The group supports the idea of changing the axis of the town centre to draw it towards the waterfront. We believe that Westgate St after the Museum St junction and Carr St should be excluded from the Central Shopping Area. This would be to encourage more retail units in the streets towards the Waterfront and to allow a change of uses in the excluded streets to housing/leisure.	Comments noted. Suggestions on amending the Central Shopping Area will be considered in any revisions to the Central Shopping Area boundary that may be undertaken as part of the Local Plan Review.	253 12
Q63: Should the Council continue to define the Central Shopping Area as Primary and Secondary and Specialist retail frontages to control	Conservative Group	We support the development of the town centre's retail offer but would also welcome innovative solutions to the challenges facing the retail sector including more mixed-use of vacant retail space and more consideration given to leisure and housing provision in the town centre.	Comments and suggestions noted.	251 68	
	Ipswich Limited	The Primary, Secondary and Specialist retail frontage designation doesn't work for Ipswich. The areas marked in the last local plan as Speciality should be	Proposed change to the frontage designations noted and will be considered in the Local Plan Review.	254 21	

	the mix of uses?		Secondary, all Secondary areas should also be Primary with the exception of St Matthews Street.		
	Q64: Should the Westgate site continue to be allocated for large-scale retail development or should other uses be pursued?	Ipswich Community Media	Like to know more about the Westgate plans.	The Council is currently working with a number of stakeholders to try and bring forward development, but these discussions are still ongoing	254 71
		Ipswich Central	New retail development within the Eastgate and Westgate Quarters should be abandoned once and for all. Any temptation for further out of town retail development should be resisted and replaced with a 'town centre only' policy. Failure to do this will continue to create confusion for potential developers, employers and other inward investment by retailers.	The Council must explore all options within existing site allocations, and this includes encouraging retail where appropriate. This will be reviewed through a further Retail Study as part of the new Local Plan.	250 90
		Ipswich Limited	Considering the borough has wrecked the top-end of Westgate Street (along with Carr Street) for its vision of making the town north to south (i.e. Cornhill to Waterfront), reduced the capacity of Crown Car Park and is planning on reducing car parking in the immediate area to this site, and has overcapacity Handford Road in close proximity, the infrastructure doesn't support such development on the Westgate site. I am sure this will become flats or just remain a car park.	Comments noted	254 22
		Conservative Group (Cllr)	The Westgate site has the potential to become a major attraction within Ipswich. All possible uses should be considered, and it should not be just considered for retail usage.	Comments noted	253 13

	<p>Q65: Should the threshold be changed? If you support a different threshold, please explain why.</p>	<p>On behalf of Asda Stores Jigsaw Planning</p>	<p>Currently the threshold for RIAs in the adopted Local Plan is 200 sqm for out of centre retail proposals. Asda considers that if this is to be increased at all then it should only be a modest increase. The requirement for retail impact assessments ensures an assessment of proposals, which are out with the Central Shopping Area and the District Centres, against the tests set out in the National Planning Policy Framework. This is vital to ensure that such proposals are correctly scrutinised and the relevant centres protected against unacceptable impact.</p>	<p>Comments noted</p>	<p>248 66</p>
	<p>Q66: Should we continue to protect all of the district centres?</p>	<p>Private individual</p>	<p>No - the importance of district centres has been reduced massively due to the growth of supermarket convenience stores (i.e. Sainsbury's Local), and closure of post office stores and smaller banks. Nacton Road District Centre is far too big, and there are duplicate stores opening up which will only take business away from other stores in the district centre, increasing the risk of such stores closing. What was a bank has been left empty for over a year. Nacton Road/Clapgate Lane/Raeburn Road are in competition with each other. The empty stores, kebab houses and off-licences do nothing for the area</p>	<p>Comments noted.</p>	<p>246 71</p>

		Jigsaw Planning On behalf of Asda Stores	District Centres play a vital role within the retail hierarchy providing core facilities to the communities which they serve. Asda support the continued protection of the Stoke Park District Centre in the forthcoming LDF. The Asda store forms part of the District Centre along with a dentist, pharmacy and newsagent. The existing Local Plan (paragraph 9.123) states that District Centres are the more strongly performing centres and rely on a stronger convenience retail offer to underpin their function, vitality and viability. The Stoke Park Centre continues to meet this role and its continued allocation as a District Centre is appropriate.	Support for continued retention and performance of the Stoke Park District Centre noted.	248 74
		Conservative Group	We should protect and promote local retail centres as far as possible. Encouraging use of the sites has extensive community benefits and is excellent for the environment by reducing car travel times.	Support for district centres and their benefits acknowledged.	253 14
	Q67: Should we be planning for the expansion of any of the district centres, if so where?	On Behalf of Aquigen	There are no immediately available opportunities to the south and west of [Ravenswood] District Centre to support a viable extension. In the absence of this, affording the opportunity for a 'de facto' extension to the east of Nacton Road would have the particular benefit of enhancing the complementary relationship which already exists	Recommendation to extend to the east of Futura Park noted. Any extension to the east will fall within the jurisdiction of Suffolk Coastal District Council and will need to be jointly planned accordingly if taken forward.	251 08

			with Futura Park and promoting mutually beneficial linkage.		
	Q69: Should we continue to protect all of these local centres? Do they still provide the function intended of them? Do any need re-allocating to different uses, or extending?	On Behalf of East of England Co-operative Society	Prince of Wales Drive - The site is currently defined as Local Centre 39 under Policy DM21. Marketing of the site for retail uses has demonstrated that there is no demand for retail use in this location and that such use is not economically viable. In order to secure beneficial alternative use it is proposed that the Local Centre designation should be removed and reallocated to enable comprehensive redevelopment for residential purposes.	Comments on status of Prince of Wales Drive Local Centre noted. Whilst it is acknowledged that the retail uses have been marketed without success, the NPPF (2018) paragraph 92(a) requires planning policies to plan positively for the provision of shared spaces, community facilities (including shops) and other local services to enhance the sustainability of communities and residential environments. Current policy DM21 of the Local Plan does provide a degree of flexibility in terms of A1 to community facilities and residential uses provided that appropriate marketing has been done. Notwithstanding this, the recommendation will be considered as part of the Local Plan Review.	253 81
	Q71: Do you agree with the approach taken to protecting pubs? If not, what measures would you like to see put in place?	Private individual	A categorization system could be used to show pubs that should be retained at all costs, those that should be retained using the current approach and those that should be used for housing. Certain pubs in Ipswich do nothing for the area apart from promoting crime and disturbance. Does Ipswich need all of the Social Clubs? Surely some of these could be incorporated into each other to provide space for housing??	Comments noted, the National planning policy recognises that public houses, along with other community facilities, enhance the sustainability of local communities and should be safeguarded and retained for the benefit of the community while allowing them to develop and modernise in a sustainable way. The Council is committed to protecting public houses which are of community, heritage or townscape value through policy DM23 (Protection and Provision of Community Facilities).	246 72

		Conservative Group	No, the market should determine whether a business is viable.	Comments noted.	253 15
Tourism	Q72: How can Ipswich continue to increase its offer as a tourist destination ?	Ipswich Community Media	There is a shocking absence of visual and contemporary arts. I am finding myself travelling to Bury, Cambridge and most usually Norwich for any whiff of contemporary arts. When the gallery was sadly taken from the college and eventually became a gallery - people thought, oh well, at least there would be life here. But having shows last 10 months, having a sterile silence and utter lack of challenging arts and visual work is sad. Support a growing arts and music centre and WET arts studios hubs! They DO bring in revenue!	The value of the Arts in helping to create a sense of place and community is understood. Although the Council has removed its "Public Art" -policy DM7, the Council is working to promote arts and culture in the town through policy CS14 (Retail Development and Main Town Centre Uses).	254 72
		Theatres Trust	Cultural facilities include your theatres, live music venues (include public houses), community spaces, museums, cinemas, libraries and other public and performance venues and are important in supporting the local/visitor economy by attracting people to centres where other businesses benefit from the flow on effects. Local plans should therefore support arts/culture at all levels to support the local economy and ensure that all residents/visitors, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which	The value of cultural facilities in supporting the local economy is acknowledged. The Council is committed to improving leisure, arts, culture and tourism in the town through policy CS14 (Retail Development and Main Town Centre Uses).	249 97

			might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration.		
		Suffolk Preservation Society	SPS promotes investment in the historic environment as a major regeneration tool which in turn can be used to attract visitors.	We promote the use of heritage assets and local character as a catalyst for regeneration and to strengthen the sense of place. Ipswich is committed to preserving and enhancing its heritage assets through policy CS4 (Protecting our Assets) and policy DM13 (Built Heritage and Conservation).	247 05
		Suffolk Chamber of Commerce	<p>We feel that the visitor experience in the town centre would be enhanced by: more trees and planted areas; an increase in sitting areas; more town centre to Waterfront pedestrian and cycle routes; and more public toilets.</p> <p>Our highest priority would be to establish a high quality music venue, upon the lines of the Apex in Bury St Edmunds, with a capacity of around 350 / 400 possibly with a dance area.</p> <p>Likewise, one or some of the de-commissioned churches in the borough, with good acoustic facilities, might both 'bridge the gap' and preserve an historic building.</p> <p>Other potential tourism attractions,</p>	The Council is working to green the streets of Ipswich through policy DM10 (Protection of Trees and Hedgerows). Similarly, a key objective of the Council is to improve accessibility between the Central Shopping Area and the Waterfront/Wet Dock. Regarding Ipswich's tourist offer, the Council promotes leisure, arts, culture and tourism in Ipswich through policy CS14 (Retail Development and Main Town Centre Uses).	251 69

			building on Ipswich's key assets, should be developed or enhanced in town centre locations for example: Ipswich Transport Museum; BT innovation zone; Maritime Museum; and an Ipswich Arts Centre upon the lines of St Mary's Arts Centre in Colchester.		
		Private individual	It needs to preserve its heritage assets somewhat better than it has to date. I am saddened every time I walk past the Gateway to Wolsey's College.	Ipswich is committed to preserving and enhancing its heritage assets through policy CS4 (Protecting our Assets) and policy DM13 (Built Heritage and Conservation).	247 35
		Private individual	By joining the 'In Bloom' movement. We have lots of old buildings - with flowers they could look a lot prettier.	Comment noted. The Council is working to green the streets of Ipswich through policy DM10 (Protection of Trees and Hedgerows).	247 51
		Ipswich Community Media CIC	Promote the cultural and the cool.	Comments noted. The Council is working to promote leisure, arts, culture and tourism in the town through policy CS14 (Retail Development and Main Town Centre Uses).	252 51
		Ipswich Limited	<p>Before we can answer this question, we must find out who can deliver marketing activities to better increase tourists and day visitors into the town.</p> <p>Proposed Tourist Attractions</p> <ol style="list-style-type: none"> 1. County Hall should be utilised as a Museum 2. Old Post Office is an ideal place for an Art Gallery 3. Ancient House should be utilised 	Comments noted. The Council is working to promote leisure, arts, culture and tourism. The Council is working with Ipswich Central, landowners and other partners to bring vacant premises in the town centre back into active use and introduce a scheme to make vacant premises look more attractive.	254 23

			<p>as a Museum</p> <p>4. A tourist attraction needs to exist at the Ipswich Waterfront</p> <p>Increasing the selection makes it impossible for the visitor to complete all the museums on a single day, so visitors would need to stay overnight/revisit.</p> <p>"The Link" route from Tower Street to Waterfront should be revisited as an tourist/heritage trail.</p> <p>Pigs Gone Wild art trail and children-focused events such as Paw Patrol attracted large numbers of people into the town. The latter category is easily organised and</p> <p>Ipswich should utilise more of these events, i.e. once per week in the summer.</p>		
		Conservative Group	Lots of ideas already outlined promote Ipswich as a cultural and leisure hotspot which in turn would increase tourism.	Comment noted, the Council is committed to promoting leisure, arts, culture and tourism in Ipswich through policy CS14 (Retail Development and Main Town Centre Uses).	253 16
		Private individual	Better shops in the town centre.	The Council is continuing to promote high quality investment and development in Ipswich Central Shopping Area.	255 15
	Q73: Do you consider the range of hotels in the town	Private individual	Overall yes. Another Travelodge near the train station as planned will be good. Another up-market hotel to rival the Salt House would be a welcome addition to encourage more tourists to Ipswich.	Comment noted.	246 73

	offers the appropriate mix and choice to visitors?	Ipswich Central	Additional reasons to visit and stay, including additional hotel space and attractions, must be planned for.	Comment noted. The tourism sector is a significant sector in Ipswich and will be supported through the Local Plan.	250 95
Climate Change and Flood Risk	Q74: How can we adapt to pluvial flooding through design?	Suffolk County Council SCC	Flood risk should be mitigated wherever possible via the use of SuDS and other water management features as outlined in the SCC Flood Risk Management Strategy (SFRMS). The County Council seeks inclusion of a requirement for new development of all scales to incorporate sustainable drainage systems into their design in line with the details contained within the SFRMS and any area specific Surface Water Management Plans (SWMP). It is recommended that the new Local Plan refer to the mitigation of surface water flooding and reference the protection of the water quality of watercourses. SCC would also welcome measures which increase water efficiency, such as water butts.	The recommendations outlined by SCC are welcomed and will be factored into the review of relevant development management policies as part of the Local Plan Review.	254 39
		On behalf of RSPB	The RSPB fully supports a co-ordinated, planned approach to the implementation of SuDS. SuDS need to be incorporated at the earliest stage of the planning process, be on or near the land surface and delivered in broad partnership to the satisfaction of the end user (residents).	The comments of the RSPB are noted and will be considered as part of the Local Plan Review in formulating relevant policy reviews. IBC appreciates being made aware of the WWT report which should be helpful as part of the Local Plan Review process.	246 87

		<p>Their effectiveness should also be monitored.</p> <p>In conjunction with the Wildfowl and Wetlands Trust (WWT), we have produced a report on this subject (Graham/Day/Bray/Mackenzie - Sustainable Drainage Systems - Maximising the potential for people and wildlife: A guide for local authorities and developers).</p>		
	Suffolk Chamber of Commerce	<p>Clearly a lot of money had been spent on the current flood defence scheme; is the scheme sufficient for future needs or does it need to be extended further down river?</p>	<p>Appendix 5.04 of the Level 2 Strategic Flood Risk Assessment shows the tidal flood barrier with an anticipated failure date of 2115. Paragraph 9.11 of the Development and Flood Risk Supplementary Planning Document (2014) demonstrates that flood frequency at 2110 with the barrier in place is anticipated to be sufficient. Flood risk and defence will continue to be monitored as part of future Local Plan reviews, in liaison with consultees such as the Environment Agency, to ensure that flood defences for the future are managed.</p>	251 70
	Suffolk County Council SCC	<p>Q74 reads "SUDS are designed to reduce potential of new and existing developments with respect to surface water drainage." It should say SUDS are designed to manage runoff from new developments, reducing damage from flooding, improving water quality, protecting and improving the environment, protecting health and safety and ensuring - SUDS definition Floods and Water Management Act.</p> <p>IBC have endorsed The Suffolk Flood Risk Management Strategy, this provides guiding principles for</p>	<p>Commentary from SCC and suggested re-wording of question is helpful. The Local Plan review process will ensure that SUDS are integrated correctly into any planning policies that are reviewed.</p>	249 21

			<p>SUDS in Suffolk. Appendix A provides guidance on SuDS designs and describes associated National Planning Policies/Guidance.</p> <p>Early consideration of spatial/locational requirements for SuDS in the planning process is essential.</p>		
		Environment Agency	<p>There is no mention in this section of the fluvial flood risk from the River Gipping, nor of the residual tidal risk remaining from the overtopping or breach of flood defences. Both of these sources of flood risk may need to be addressed by developers in their FRAs. The Local Plan should consider a local policy defining what development would be considered acceptable in areas at risk of flooding. This would provide clarity and enable developers to understand what could be considered safe. We would welcome discussion with you to create such as policy.</p>	<p>Comments from Environment Agency useful and noted. Suggestion of defining what development is acceptable in certain areas at risk of flooding will be considered in Local Plan Review.</p>	253 38
		Conservative Group	<p>Ensure suitable drainage and sewerage infrastructure is in place before a development takes place rather than by the time it is completed.</p>	<p>Comments noted.</p>	253 17
	Q75: What is your experience of SuDS? Are they successful	Suffolk Wildlife Trust	<p>SuDS can have not only a flood risk benefit but can also be of benefit to biodiversity. All SuDS schemes should be designed with this dual benefit in mind, to maximise the opportunities for wildlife within new</p>	<p>Comments from Suffolk Wildlife Trust noted, and importance of biodiversity benefits of SUDS acknowledged. IBC will bear the guidance referenced in mind when reviewing relevant policies.</p>	250 20

	<p>and an efficient use of space? What is their long-term effectiveness?</p>		<p>developments. Guidance on designing SuDS to benefit wildlife has been produced by the RSPB and WWT1 and provides examples of how their potential can be maximised for people and wildlife.</p>		
		<p>On behalf of RSPB</p>	<p>This report (Environmental Policy Consulting - Sustainable Drainage Systems on new developments:</p> <p>Analysis of evidence including costs and benefits of SuDS construction and adoption, Final Report For the Welsh Government January 2017) sets out the significant economic, social and environmental benefits of SuDS.</p> <p>Including:</p> <ul style="list-style-type: none"> * capital cost saving of £9000/home * Improve water quality and protect drinking water resources * Limit flows entering system and therefore maximise network capacity * Improve health and wellbeing * Help manage air quality * Increase property value * Enhance biodiversity 	<p>Comments and summary noted.</p>	<p>246 93</p>

			<ul style="list-style-type: none"> * Provide education * Improve thermal comfort * Provide amenity and recreation 		
		The Woodland Trust	<p>The plan should recognise the role trees/woods can play as part of SUDS. Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The FC's publication, The Case for Trees (2010) explains how: 'the capacity of trees to attenuate water flow reduces the impact of heavy rain/floods and can improve the effectiveness of SUDS'. Trees can help reduce surface water flooding in urban situations too, regulating the rate at which rainfall reaches the ground. Slowing the flow increases infiltration and the ability of engineered drains to takeaway excess water.</p>	<p>The comments regarding the role that trees/ woods can contribute towards SUDS is noted and will be integrated into the review of the Local Plan where necessary and relevant.</p>	248 98

		Suffolk County Council SCC	Ravenswood is a clear example of successful SuDS. Many others exist, see SUSDRAIN web site and many other references in our SuDS Guide.	The positive feedback of Ravenswood is welcomed.	249 20
		Environment Agency	The Plan refers to SuDS as a means of surface water drainage. IBC should liaise with Suffolk County Council (as Lead Local Flood Authority) on potential opportunities to reduce and manage surface water flooding. We support the use of SuDS to help to prevent the pollution of groundwater and surface water, provide aquifer recharge and to provide ecological and amenity benefit, in addition to managing flood risk. It should also be ensured that appropriate measures for maintaining SuDS are put in place. SuDS should be integrated into schemes at an early stage and designed to provide maximum benefits without causing adverse impacts. Deep infiltration systems should be a last resort option for disposal of surface water. Appropriate pollution treatment steps must be in place (CIRIA C753).	IBC will endeavour to liaise with SCC as part of the Local Plan review process to reduce and manage surface water flooding. The additional information on the value and needs of SUDS is useful and will help inform the Local Plan Review where applicable.	251 82
	Q76: What measures do you consider can be introduced into urban	Suffolk County Council SCC	The Suffolk Climate Change Action Plan (SCCAP), published in March 2017, identifies four key themes which are: A Business and Community Resilience; B Business Energy Efficiency and Renewables; C Community Energy; and D	The Council has dedicated policies to protect against climate change and is working with neighbouring authorities on a Water Cycle study which will look to increase water efficiency.	254 40

	areas to address climate change?		<p>Domestic Energy Efficiency. The Borough Council should consider this strategy and the extent to which planning policies can contribute to realising its objectives.</p> <p>The County Council would welcome measures which increase water efficiency, such as water butts.</p>		
		Historic England HE	<p>Include a specific policy relating to the inclusion of renewable technologies within Conservation Areas and with regard to historic buildings and the wider historic landscape. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. See also Historic England guidance: https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pt/</p>	Comments noted	249 41
		Suffolk County	<p>More rainwater harvesting, simple measures such as water butts, or perhaps not permitting</p>	Comments noted	249 19

		Council SCC	developments which have long term requirements for pumps for drainage. Open landscaped/vegetated SuDS.		
	Q77: How can we encourage new developments to reduce carbon emissions and be climate change resilient? Should we require development to meet higher standards of energy efficiency and lower levels of water usage?	Mersea Homes	<p>We have consistently argued that sustainability targets within the Ipswich administrative area have failed to reflect the viability of development and are incompatible with the approach and standards set out by government. Unrealistic targets do not, in our view, provide an effective basis for securing compliance. Where government sets out a clear approach to standards - as</p> <p>is the case with Building Regulations - the Council should adopt those standards as its mandatory requirement and encourage enhanced performance rather than establish that as policy.</p>	Concerns for scheme viability is noted, however, the NPPF has encouraged the inclusion of local plan policies that support the government's stance on climate change and emissions.	254 90
		On Behalf of Kesgrave Covenant	<p>As per our response to Question 34, the Council's policies need to be in line with national planning policy advice in respect of water consumption and energy efficiency. If the Council wish to encourage developers to pursue higher standards voluntarily, then in practice this may mean adopting greater flexibility on other development standards/requirements to encourage that to happen. For example, the Council could</p>	The Council will continue to review the need to engage a tariff-based approach to the delivery of infrastructure. The council's environmental objectives include the preservation of water supplies as a part of the delivery of sustainable development anticipated in NPPF149	248 89

			investigate a lower CIL rating for developments achieving certain standards.		
		Environment Agency	We support the consideration on water efficiency for new development. The Environment Agency 'water stressed areas - final classification' report, July 2013, identifies the entire area as being under 'serious stress' and over time pressures from changing weather and population growth are likely to increase. As well as supporting the natural environment, water resources are critical to sustainable economic growth and housing development.	Support welcomed	25184
	Q78: What measures should be encouraged to provide renewable and low carbon energy development within Ipswich?	Mersea Homes	Whilst we recognise that all opportunities for achieving low carbon energy development should be considered, there is no basis for mandating such opportunities beyond nationally prescribed standards.	Para149 of the 2018 NPPF asks councils to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	25491
		Private individual	Low carbon is not just about the number of CO2 emissions, it is a symbolic idea of a behavioural change and a sustainable way of living. Energy is important, but a low carbon strategy that will address climate change needs to consider what a low carbon landscape means. This also includes history, culture, environment, interest and	Comments noted - the Council remains committed to reducing the impact of future development on the environment.	24801

			engagement of the visitors and also activities to support the economic development of the area. Low carbon landscape is so much more than energy and transport, it is a different way of seeing.		
Design	Q79: What in your opinion makes a well-designed development? Do you feel that high quality design is being delivered in Ipswich?	Ipswich Community Media	We all here passionately believe that design and style can bring people to a town and ALSO bring people down, the terrible new redesign of the back of the tower ramparts proves that. Maintaining our heritage and trying best to keep old buildings bring them back to life or utilise whilst empty is paramount - but we only need look to some of the greatest venues or clubs to understand that you can also bring energetic life to a place. There's a wealth of good creativity here in this town that seem to be underused.	The Council will publish its Supplementary Planning Guidance for the Public Realm. The NPPF 2018 has also given the Council the opportunity to take a stronger line on design in its development management processes.	254 73
		Suffolk Wildlife Trust	High quality design should maximise the ecological value of sites, by retaining and enhancing existing features and creating new ones. This can include the use of green roofs and landscape planting to aid connectivity, permeable boundaries to allow hedgehogs to move through the site, integrated roosting opportunities for bats and integrated nesting opportunities for birds such as swifts.	Comments noted and supported.	250 21

		Suffolk Preservation Society	SPS considers that high quality design that creates a strong sense of place while contextually sensitive. While there are some examples of exceptional design in Ipswich (Willis Building) much of the recent residential development lacks distinction and makes at best, a neutral contribution to the identity of the town.	The NPPF 2018 provides support for Councils to deal more firmly with design issues and encouraged the preparation of design codes to improve standards. When coupled with Public Realm improvements promoted by the Council's emerging SPD the Council anticipates a period of improved design standards generally.	247 06
		Historic England HE	We strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. We particularly seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. This should not stymie contemporary development but should require an appreciation of the significance and character of the historic environment in producing a high standard of design. We would also welcome this in relation to tall buildings policy that may come forward in the plan.	Please see comments above. The tall buildings policy has been removed from the policies in favour of a more broadly-based set of design policies and SPD which combined with NPPF policy should improve the design standards in the borough.	249 42
		Suffolk Chamber of Commerce	We strongly recommend that every attempt is made through the Plan and the planning processes to ensure that new developments contribute positively to, and help to drive up, the quality of the built environment. More iconic rather	As above	251 71

			than simply utilitarian design would enhance the image of Ipswich and its attractiveness to investors and visitors alike.		
		Private individual	Developments may be well designed in the first instance but the Council desperately needs to ensure that new developments are kept in a good state of repair. The social housing scheme off Hawes Street is a dump compared to the architects designs - the render is in an awful condition. building on the waterfront still hasn't been repaired after a storm a number of years ago. The Sir Bobby Robson bridge is covered in green algae. Better quality wooden cladding should be used as relatively new developments are beginning to look tatty because poor quality cladding is rotting.	Concerns noted for the quality of materials used. Improved design sought as above.	246 74
		Suffolk Constabulary	A balance between the principles of Secured By Design, sustainable development and good architectural design.	Comments noted	248 52
		Suffolk County Council SCC	I would suggest guidance on dwelling sizes, floor area, building height, garden size and open spaces, as well as densities, should be provided and followed when making allocations to individual sites. The guidance should also take into account spaces needed for appropriate SuDS and need to avoid significant flood risk areas . i.e. Taller dwellings and more open	Comments noted	249 18

			space would mean more space for SuDS is available.		
		Ipswich Community Media CIC	Sailmakers is an example of appalling design. Future improvements to design must be made - we have to up our game.	Comments noted	252 52
		Ipswich Limited	Those running our town shouldn't be afraid of Ipswich becoming more city-like and should actively encourage it. Why not allow the town centre to have more beautiful modern buildings? All noticeable examples over the last 10 years or so are on the outskirts of town!	Comments noted	254 32
		Suffolk Fire & Rescue Service	The Ipswich Local Plan needs to establish a framework which creates 'safe and accessible environments' (as set out in paragraph 69 of the NPPF). Fire safety is a relevant consideration, in respect of infrastructure needs, access by services to new development and water supply. Suffolk Fire and Rescue Service (SFRS) undertakes an Integrated Risk Management Plan (IRMP) every 3 years to evaluate the risks within our area and our response to them. Any large scale development would also be evaluated at the planning application stage. At the present time it is not envisaged that the scales and distributions of development in the emerging local	The suggested promotion of sprinkler systems in the design of schemes is appropriate for inclusion in the supporting text, as it is not usual for the Local Plan to restate the contents of Building Regulations in policy. The Council uses the following "informative" clause which can be attached to relevant planning decision notices. It states: " Ipswich Borough Council supports the use of automatic sprinkler systems." As the Council wishes to be supportive of the Fire Service in encouraging the use of sprinkler systems a commentary is suggested that will be added to supporting / explanatory text.	254 98

		<p>plans would impact significantly on our emergency response, however, this would be kept under review using our IRMP process and may change due to specific developments in the future. SFRS encourages the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard site access to specific developments, as long as access is in accordance with building regulation guidance. There will of course need to be adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.</p>		
		<p>These points on access and water can be managed at the planning application stage but the Local Plan could usefully identify the steps that developers need to take, for ensuring that proper access for emergency vehicles and water supplies can be made. A further beneficial step would be establishing a policy position for securing water supplies via condition and highlighting the several benefits of sprinkler systems in supporting text.</p>	<p>comments noted</p>	<p>254 98</p>

		Private individual	Stop reducing light to existing residents by doing away with high-rise. Sunlight helps all.	Comment noted - The Tall building policy has been removed and will be replaced by a set of policies that seek to control design in a manner that is relevant to an individual site.	255 04
Q80: Should Building for Life 12 continue to be used as a tool to improve the design quality of new development?	Mersea Homes	As with other policies which seek to establish minimum standards, central government sets nationally applicable standards, and these should be reflected in policy. Where the Council wishes to encourage higher standards, it should only do so fully recognising the viability implications of those additional aspirations. In that context, we do not think that the Building for Life should be set as a policy target.	NPPF support for design codes has increased. Para 129 refers to "assessment frameworks such as Building for Life and remind that they "are of most benefit if used as early as possible in the evolution of schemes and are particularly important for significant projects such as large scale housing and mixed use developments". The effect of the requirement should mean that expected design standards for development in the IBC plan area can be reflected throughout both viability and valuation exercises that surround the development process from scheme inception.	254 92	
	Suffolk Preservation Society	SPS supports the use of Building for Life 12.	Support welcomed	247 07	
	Suffolk Constabulary	Suffolk Constabulary supports the objective of Building for Life 12 to create a development that is safe and provides everything expected for a new community.	Support welcomed	248 53	
Q81: Do you think the tall buildings around the Waterfront enhance the vibrancy of the area? Are there	Ipswich Community Media	Keep the wine rack as a monument - a piece of sculpture somehow it speaks for our time?	The Council notes that construction on the 'Winerack' has since re-started.	254 74	
	Suffolk Wildlife Trust	The vibrancy of tall buildings could be enhanced through the inclusion of swift nesting opportunities integrated into the fabric of the buildings. Such buildings provide ideal opportunities for swift nest boxes and can play a significant part in swift conservation.	The Councils Design and Open Space guidance encourages wildlife home features to be incorporated into buildings, including swift bricks.	250 22	

<p>other areas of the town where additional tall buildings (of appropriate construction standards) would be appropriate ?</p>	<p>Suffolk Preservation Society</p>	<p>Yes. We support tall buildings (not exceeding 7 storeys) where they are of a very high standard of design and they do not cause harm to the setting of designated heritage assets.</p>	<p>Comments noted. The Council supports tall buildings in appropriate locations however it is committed to ensuring that tall buildings do not harm the character and appearance of the historic environment.</p>	<p>247 08</p>
	<p>Historic England HE</p>	<p>The Waterfront, by the nature of the existing historic warehouse buildings, can potentially incorporate buildings of a more industrial scale and height. However, new additions along the Waterfront are of mixed success. Those truly tall buildings have had a significant impact on the skyline and nearby designated heritage assets. We are concerned that further tall buildings will cumulatively be severely harmful to Ipswich's historic environment. There is unlikely to be scope for additional tall buildings elsewhere in Ipswich's historic core and, owing to its topography, buildings at the edge could still have an impact looking out from the town centre.</p>	<p>The Council understands the impact that any further tall buildings across the Waterfront may have on existing heritage assets and this will be considered as part of any future planning applications for development in this location.</p>	<p>249 43</p>
	<p>On behalf of RSPB</p>	<p>Tall buildings around the waterfront which have integrated swift-bricks within them will undoubtedly increase the vibrancy of the waterfront area.</p> <p>Swifts have declined by 51% since the mid-1990s. They are the fastest bird in direct flight. Only landing to nest. They are the epitome of &"vibrant";.</p>	<p>Comments noted</p>	<p>247 54</p>

			The RSPB in conjunction with Barretts has worked with Manthorpe building products and Action for Swifts to design and produce a low-cost integrated swift-brick (c.£20)		
		Ministry of Defence MOD	The MODs principle concern relates to ensuring that tall structures especially tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area. As you will be aware air traffic approaches and technical installations at MOD aerodromes are protected with statutory safeguarding zones which identify height consultation zones in the area surrounding MOD aerodromes relative to topography and distance from the site (s).	Comments noted	248 14
		Private individual	Decrease the number of high-rise buildings around the town and number of pointless office blocks standing empty for many years.	Comments noted	248 36
		Private Individual	I doubt tall buildings have enhanced the vibrancy of the area, particularly where development has stalled.	The Council notes that Tall buildings can provide an important contribution to the landscape and townscape of Ipswich and also that the 'Winerack' has since recommenced construction.	247 82
		Ipswich Limited	The tall buildings didn't really take off. Tall buildings do not suit Ipswich. Whether we are talking office blocks or residential, there has always been a struggle for occupancy in the town.	Comments noted	254 24

		Private Individual	No more high-rise buildings.	Comments noted	255 01
Q82: Do you feel more protection should be given to street trees? Do you have specific examples of trees which should be protected?		Suffolk Wildlife Trust	Street trees should not only be protected but should also be managed to maximise their biodiversity value in the long term. It should also be ensured that new and replacement trees are planted so that the current target of 22% cover by 2050 (in policy DM10) is met.	Comments noted, the Council is committed to meet it's 22% canopy cover target by 2050.	250 23
		Northern Fringe Protection Group NFIG	Yes. It is too easy to bypass TPOs. Like for like planting needs to be enforced and a 2 for 1 replacement required for new developments.	The Council does insist on 2 for 1 replacement planting	249 87
		Save our Country Spaces SOCS	Yes. It is too easy to bypass TPOs. Like for like planting needs to be enforced and a 2 for 1 replacement required for new developments.	The Council does insist on 2 for 1 replacement planting	250 50
		On behalf of RSPB	<p>The RSPB commends IBC for having a specific policy on street trees. This policy should look to enhance the existing network and not just consider their protection.</p> <p>We reference the following report - Forest Research (2010). Benefits of green infrastructure. Report to Defra and CLG. Forest Research, Farnham.</p> <p>Benefits of trees - provide clean air, reduce contaminants, reduce flooding, aesthetically pleasing, reduce & "heat island"; effect, support and connect wildlife and in</p>	Comments noted	247 55

			particular the Ipswich Wildlife Network.		
		Private Individual	The council should look to have more hedges rather than trees. Hedges have been shown to reduce pollution in urban areas much better than trees as it traps the pollutants at a lower level. Trees require pollutants to travel past head height which means that the pollutants are likely to be breathed in by the population before they are taken in by the trees.	Comments noted	246 75
		Private individual	Yes, trees and green areas in general should be protected and cared for. I was disappointed when a cluster of Elder trees were removed near my flat. There are so few trees near the town centre and these trees provided a habitat and source of food for birds and other wildlife.	Comments noted	247 38
		Ipswich Community Media CIC	Yes!	Comments noted	252 53
		Conservative Group (Cllr)	Street trees should be protected in all cases and we should encourage the planting of far more trees within the Borough as they undeniably add to the fabric of the area and have social and environmental benefits.	Comments noted	253 18

	Q83: Do you feel there needs to be greater attention to the architectural design of buildings in these locations?	Suffolk Preservation Society	We support the concept that gateway buildings should be of a very high standard of design however we would promote high standards of design in all sensitive townscape locations.	The revised NPPF will help raise design as a key feature of development proposals.	24709
		Historic England HE	Variety and repetition in buildings in response to area and function are key in building a cohesive town. Buildings are critical in wayfinding and encouraging people to explore and feel comfortable in an area. As such, buildings at critical locations in Ipswich should have greater attention to their architectural design. This does not mean that a proliferation of landmark buildings are required but that consideration to form and function, both as a building and in a streetscape, is essential.	As above	24944
Historic Environment	Q84: What could be included in a positive strategy in the Local Plan to protect and enhance heritage assets?	Ipswich Community Media	Great questions - so we pay NO heed really to the strength of the heritage - maybe a stronger trail? Arts / murals - to support this (look to the mission or other areas in san fran to see how tourists love a good bit of street art! I was in east London Saturday and saw 7 groups of TOURS of street art1) could be celebrate our writers, artists, merchants in a more innovative way?)	Noted. The Council recognises the value of public art and the contribution it makes to the public realm. We promote the use of heritage assets and local character as a catalyst for regeneration and to strengthen the sense of place.	25475

		Suffolk County Council SCC	Policies should identify a means of ensuring that development protects and provides for enhancement of heritage assets, both on-site and cumulatively, at a strategic level, with integration into master planning and briefs and strategies for 'quarters' or 'opportunity areas'. The plan should clearly set out strategic and development management policies that ensure that the local and national/international significance of heritage assets can be understood in decision-making processes. The plan should have Development Management policies relating to different types of heritage asset (both built and below ground). The policy framework should be set out in such a way as to link heritage assets to the different objectives they support, and consideration of the historic environment should be integrated through the plan.	The Council will strengthen the protection of and seek to promote improvement to heritage assets through its strategic and development management policies and conservation area management appraisals. Separate policies relating to both built and below ground heritage will be proposed under the new plan.	254 38
		Suffolk Preservation Society	a clear requirement for a Heritage Assessment should be included within the council's heritage policy in order to fully understand the significance of the asset and any changes impacting on it.	Noted.	247 11
		Historic England HE	Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment. A good strategy will offer a positive holistic approach throughout the	Noted. The Council is committed to conserving and enhancing its heritage assets through its strategic and development management policies. In addition Conservation Area Appraisal and Management Strategies, recognise the importance and quality of individual areas.	249 45

			whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan. It will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. See original for comments on the approach to site-specific policies also.		
		Private individual	Ipswich has a rich history; it has some of the finest buildings in the country and I am not referring to some of the so-called high spec buildings built since the 60s. It's time to shout about our history and build on it. We are not a London over spill. Suffolk is built on hard work and graft it is not based on pie in the sky. The town should serve the county. It would be great to see both the council and the county council work together to keep Ipswich together.	Noted. As per policy DM13 the Council intend to refuse proposals which result in the harmful loss of heritage assets.	248 37
		Suffolk Constabulary	Please refer to comments on DM8 above where greater emphasis is given to security in order to protect heritage assets as risk of damage through criminal behaviour. Also to ensure anyone living or working in such buildings is afforded the flexibility on security to ensure that inhabiting the building is viable, to prevent empty buildings which often	The Council encourages consideration of the principles of Secure by Design where appropriate.	248 54

			then become a target for criminal and anti-social behaviour.		
	Q85: Are the existing measures to control development in conservation areas effective, for example requesting that new shopfronts be constructed from high quality materials and respect the character and appearance of the building and street scene? Are there any other ways we can enhance	Suffolk Preservation Society	The existing use of Article 4 Directions in conservation areas, together with appraisals and associated management plans, are appropriate measures but rely on regular review and strict application of the adopted guidance.	Noted. The Council is committed to regularly reviewing its conservation area appraisals, which are treated as a material consideration in all planning decisions.	247 12
		Historic England HE	The local plan process provides a basis for the continued update and management of Conservation Management Plans, identifying each conservation area's local identity and distinctiveness. These should identify features that typify and contribute to this special distinctiveness as well as allow for less tangible judgments of character, quality of place and special distinctiveness. The plan will be more robust where it directs future development to take account of the special, distinctive character of Conservation Areas. Review the conservation area appraisals and boundaries for both Central and Wet Dock as part of the evidence base, and consider using Article 4 directions.	Noted, currently policy DM8 Heritage and Conservation failed to reference the adopted Conservation Area Appraisals and Management Plans.	249 46

	conservation areas?				
	Q86: Are there additional areas which you consider should be designated as conservation areas?	Historic England HE	We recommend a review of the conservation area appraisals and boundaries for Central and Wet Dock Conservation Areas, to ensure that historic Ipswich is understood and can inform the 21st century Ipswich which is emerging. This would include incorporating the archaeological information coming forward. Once an updated baseline of understanding is established, Article 4 directions could be considered to prevent erosion of character and quality in the conservation areas. We would also welcome provision for any future designation of conservation areas within the Borough as well as specific provision for the landscape setting of different parts of the area.	Noted, the Council is currently reviewing its Conservation Area Appraisals and boundaries including for the Central and Wet Dock Conservation Areas.	249 47
	Q87: How could our archaeological assets be protected?	Historic England HE	We welcome specific provision for the protection and enhancement of archaeology and emphasis that sites of archaeological importance can occur everywhere. Give clear guidance on expectations for archaeological recording and the submission of records with an appropriate public record for archaeological remains that are not	The Council will produce an Archaeology SPD to further enhance protection of the borough's archaeological assets.	249 48

			retained in situ. Where suggested sites are located in areas of known archaeological potential, give weight to this as a consideration in site selection. Liaise with the County Archaeologist at site allocation stage. Emphasise in policies and supporting text that the setting of heritage assets should be considered holistically as part of the historic environment.		
		Ipswich Archaeological Trust IAT	On the whole, the town's archaeological assets have been well-protected by the planning policies. However, some nationally important sites, excavated on the waterfront, have not been analysed and brought to archive or publication following the bankruptcy of the developers. The costs of excavating some of the more complex sites has rendered their development unprofitable. Serious consideration should be given to how the Local Plan Policies can be used to ensure that the necessary funds are available. One option would be to create the fund through an archaeological levy on ALL future planning consents or the use of the existing CIL.	Comments noted. The council does not currently have CIL implemented and an Archaeology Levy is not a viable solution.	252 58

	Q88: How can Ipswich better utilise its heritage assets and archaeology?	Historic England HE	We welcome the forthcoming SPD on archaeology. As mentioned before, the heritage assets (including archaeology) should be integrated into the development of policy for the vacant sites and regeneration areas in Ipswich. Understanding the importance of the remains, particularly in the Waterfront area, should influence the modern design solutions coming forward. As such we particularly recommend a review of the conservation area appraisals and their boundaries for both Central and Wet Dock as part of the evidence base for the new local plan to ensure that historic Ipswich is understood and can inform the 21st century Ipswich which is emerging.	The Council comments that the Archaeology SPD is underway, and a review of the Conservation Area appraisal and their boundaries is also taking place.	249 49
		Suffolk Chamber of Commerce	We believe that much could be done to make more of the historic assets of Ipswich, which are not much or very effectively exploited for tourism and educational purposes. More could be made for example through improved displays and interpretation of: Christchurch Mansion; Ipswich's Anglo-Saxon heritage and associated archaeology; our industrial past; and Wolsey's Gate.	Comments noted	251 72

		<p>Ipswich Archaeological Trust IAT</p>	<p>Archaeological excavation and research since 1974 has shown that Ipswich is one of England's earliest towns but this fact has been little utilised.</p> <p>The vast amount of information gained through excavations could and should be exploited both for the interest of local people and to attract tourism.</p> <p>Clearly, there is nothing above ground to see of the Anglo-Saxon town, apart the street system which dates from that period, but there is a vast collection of artefacts from the excavations and a fascinating story to tell. There is still no adequate display of the evidence for the town's origin and development in the town's museum. The Council should consider using the Community Infrastructure Levy to fund public displays and the dissemination of the results.</p> <p>The connection with the nearby contemporary Royal site at Sutton Hoo should also be exploited. For example, once the full size replica of the Sutton Hoo ship has been built at Woodbridge, it could easily sail to Ipswich waterfront as a tourist attraction and visitors could be better encouraged to visit both locations.</p>	<p>Comments noted. The Council does not currently have CIL but this is regularly reviewed</p>	<p>252 59</p>
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		Ipswich Archaeological Trust IAT	<p>There is also potential to develop some of assets of the later town. In the future, there will inevitably be proposals to develop the site of Wolsey's College, near the waterfront, and this would provide an opportunity to promote the Wolsey connections to the town. Consideration should be given to preserving the remains of the College as an archaeological park or at least marking its outline within any new development. A Wolsey display could be housed in the adjacent St Peter's Church. These proposals could be pursued through specific planning policies for the areas of land within the Wolsey College precinct.</p>	Comments noted	252 59
		Ipswich Limited	<p>By utilising its heritage assets for tourism, sharing our great town with visitors and tourists, rather than modern half-baked regeneration projects to launch a university and to market overpriced flats.</p> <p>A new permanent place needs to be found for the Ipswich Market. The Ipswich Market should be an annex of The Saints - and it would be well situated in Cromwell Square. It is the perfect location along the streets of independents on the way to the waterfront with an iconic landmark as a backdrop. Having a standalone location allows the possibility of a full-time market.</p>	Comment noted. The location of the market will be under review once the redevelopment of the Cornhill is completed.	254 25

			Ipswich Borough Council needs to take back control over Ipswich Museums.		
		Conservative Group (Cllr)	The Upper Orwell Crossings will have a major effect on the traffic around the town. This could ease the congestion within the gyratory allowing better pedestrian access to the waterfront and allowing increased exposure and usage to the cultural assets in this area.	Comments noted. The Upper Orwell Crossings are still under review.	253 19
Q89: How should the Waterfront be further developed as a heritage feature of the town?		Suffolk Preservation Society	We support further development of the Waterfront where a very high standard of design is employed (not exceeding 7 storeys in this location) which does not harm the setting of designated heritage assets and better reveals their significance.	Comments noted	247 13
		Historic England HE	As discussed under other questions, the Waterfront area conservation area appraisal and boundary would benefit from a review, particularly in light of the urban archaeological database. This evidence could then inform strategic policies and a masterplan for the area and how it can be reconnected with the town centre.	The Wet Dock Conservation Area is to be reviewed and re-named the Waterfront Conservation Area	249 50
		Private individual	Use some of the empty commercial units which clearly have no commercial interest as community space or more importantly a temporary museum showing the	Comments noted	246 76

			heritage aspects of the waterfront. space could be used to show old films etc.		
		Ipswich Archaeological Trust IAT	The proposal to create a 'Gippeswyk Centre' on the waterfront, dedicated to telling the story of England's first town, and first advanced in a bid to the Millennium Commission, should remain an objective in some form. This would need to be co-ordinated with whatever display Ipswich Museum proposes but could concentrate on the maritime history of Ipswich from the 7th to 20th centuries. Such a display would be best housed at or close to the waterfront, perhaps in one of the many ground floor 'commercial' unit overlooking the river.	Comments noted. The proposal for a theatre on the ground floor of the winerack has now been altered to consider a retail unit instead. The Council would encourage any cultural enhancements to the waterfront.	252 60
		Ipswich Limited	Despite all the focus, there still isn't an tourist attraction at the Waterfront. There is no visitor centre. There isn't an ATM. Some nice restaurants, cafes and a pub - nothing the town centre hasn't got! Nothing most other settlements do not have including cities, towns and some villages.	Comments noted	254 26
Open Space and Biodiversity	Q90: Should the Council continue to apply a standards approach to the provision	Sports England	Sport England does not encourage a standards approach with regard to the provision of outdoor space for sport, as this fails to take account of current levels of provision and variations in existing supply and future needs. Policies should be based on the current Ipswich Playing Pitch Strategy (2015) which	Comments noted, and the review of a standards approach will take place in due course	248 79

	of new open space per head of population ?		assesses current supply and demand, as well as future requirements, for playing pitches in the Ipswich Borough Council area.		
		Suffolk Wildlife Trust	Provided that the standard set is appropriate and achievable, we consider that using a standards based approach is an adequate way of ensuring that sufficient open space is delivered.	Comments noted	250 25
		Northern Fringe Protection Group NFPG	Yes.	Comments noted	249 88
		Save our Country Spaces SOCS	Yes.	Comments noted	250 49
		Natural England NE	Natural England considers that Accessible Natural Greenspace Standards (ANGSt) should be applied to the Borough to ensure that everyone has access to good quality natural greenspace near to where they live. We advise seeking opportunities to link existing natural greenspaces in addition to the management of existing open spaces and the creation of new ones.	Comments noted	249 99

		<p>The Woodland Trust</p> <p>We favour the use of access standards to determine the amount of new greenspace which may be required, particularly as part of new housing or commercial development. The Woodland Trust has developed an access to woodland standard for use by local authorities. This aspires that everyone should have a small wood of at least two hectares in size within 500 metres of their home.</p> <p>Tree planting/woodland creation can be developed in other ways. Putting street trees in new and existing housing areas can be of great benefit, particularly in reducing air pollution.</p>	<p>Comments noted and Open Space provision is always considered as part of new developments</p>	<p>249 05</p>
		<p>Environment Agency</p> <p>We welcome the recognition of the range of sizes and types of open space in Ipswich. Benefits of the provision of new, and enhancement on existing, multifunctional open space include reduced flood risk, leisure provision, social cohesion and an increase in the value of development. The Plan suggests that fewer large areas of open space would be more cost efficient to maintain than a large number of small spaces. However, the plan should also consider the benefits for urban biodiversity and amenity provided by a network of smaller open spaces.</p>	<p>Comments noted</p>	<p>251 87</p>

			<p>Policies should look not only to halt biodiversity loss but to provide net gains for biodiversity wherever possible. We would encourage policies for de-culverting, removal of redundant structures from Main Rivers, creation and maintenance of green corridors to buffer watercourses, native riparian tree planting where appropriate and removal of invasive non-native species. There is currently no mention of non-native species, and the River Gipping in particular has Himalayan Balsam, Japanese Knotweed and Giant Hogweed which are negatively impacting on biodiversity within Ipswich and must be addressed.</p>		
		<p>Conservative Group (Cllr)</p>	<p>No, a standards approach should not be used. As with many other items this should be considered on a case by case basis. Some of the smaller areas of open space in recent developments have proved to be unpopular and difficult to maintain efficiently. If we have such a shortage of housing space, then we need to resist the addition of extra smaller open space areas and instead use contributions from developers to increase the standards of what we already have.</p>	<p>Comments noted and the standards approach will be reviewed.</p>	<p>253 20</p>

	Q91: Is your perception that there is too much, too little or about the right amount of open space in the Borough?	Suffolk County Council SCC	In making decisions relating to open space and biodiversity, IBC should be mindful of the importance of open space and the natural environment to public health, the historic environment and the economy. Factors cited by companies in favour of investing in Suffolk and Norfolk include the area's quality of life and its environment. Our natural environment plays a huge part in the quality of life here and in our existing and future competitiveness. The Local Plan offers an opportunity - even in an urban area like Ipswich - to incorporate measures for enhancement of the natural environment into new development.	Comments noted	254 37
		Northern Fringe Protection Group NFIG	Too little. This is evidenced by the deficit to standards across Ipswich in many categories.	Comments noted, although the deficits are not in every area and can be addressed through future plan making	249 89
		Save our Country Spaces SOCS	Too little. This is evidenced by the deficit to standards across Ipswich in many categories.	Comments noted, although the deficits are not in every area and can be addressed through future plan making	250 48
		Greenways Countryside Project	Our perception is that there is not enough open space to meet the needs of a growing population and wildlife.	Comments noted	253 48
		Ipswich Wildlife Group IWG	We believe that that there is not enough open space to meet the needs of the growing population and of wildlife.	Comments noted	248 27

		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group.	When identifying potential land for development, consideration should be given to the role open space plays to the development of healthy communities and preventative care.	Comments noted	249 07
		Ipswich Limited	There isn't enough open space in the Borough, and this is a direct consequence of boundary constraints which are not fit for the 20th century (not a typo!) and must be expanded.	Comments noted. A boundary review is not currently under consideration	254 27
	Q92: There is a deficit of provision for teenagers – facilities such as teen shelters and multi-use games areas. What sort of provision should be made and where?	Ipswich Community Media	The youth we work with in Chantry, Westgate ward in particular are desperate for some youth spaces. Making them bright light and safe - particularly in jubilee area - that would be fantastic. I went down tonight and there were about 60 young people in the dark, in a broken up basketball court. What a treat to make it bright and safe (and keep the dealers out!).	Thank you for the comments, they will be considered further as the plan process continues.	254 76
		Suffolk Constabulary	As previously described, this should be on the edge of housing areas - but close enough for young people to be safe and subject to some natural surveillance. Young people in the area, as well as those working with them , should be consulted at the time of any proposals to ascertain which	The Planning Policy team will establish direct contact to agree inputs to the ongoing process of planning for community facilities.	248 55

			<p>facilities are required by that community.</p> <p>Design Out Crime Officers should also be consulted at the earliest opportunity.</p>		
		private Individual	More places for young adults to meet and feel safe, without causing ASB.	Comments noted	255 18
		private Individual	More music venues needed for youngsters. Something for youngsters to do in Ipswich would be good. No local sports facilities or anything in Stoke Park.	Comments noted	255 02
	<p>Q93: There is a deficit of Accessible Natural Greenspace in north Ipswich. A new country park at the Ipswich Garden Suburb will be provided as the development is built out. Do you feel there is a need for</p>	Mersea Homes	As the Council notes, the IGS will deliver a new country park serving new and existing development and reducing potential impacts on sensitive habitats to the south of the town. The country park will provide the necessary mitigation for development both in the northern fringe and town wide. There is therefore, in our view, no need for further mitigation to serve that function. Where development is located away from Ipswich and its fringes - for example further along the A14 corridor, it is possible that specific mitigation may be required to serve those new homes.	Comment noted. The need for additional green space is an important consideration in the delivery of sustainable development as it offers benefits to personal health, feelings of wellbeing and the opportunity for moving around the town by foot or bicycle. Provision will be kept under review and opportunities taken as required.	254 93
		Suffolk Wildlife Trust	Whilst we acknowledge that a new country park will be provided as part of the Ipswich Garden Suburb, we query whether this will address the existing deficit of accessible natural greenspace in the north of the town	Please see comment above	250 26

<p>more Accessible Natural Greenspace in addition to this in north Ipswich?</p>		<p>given the number of new residents that will result from the development? Opportunities to provide additional new accessible natural greenspace should be explored in order to address the existing deficit.</p>		
	<p>Northern Fringe Protection Group NFPG</p>	<p>If there is no reduction in the green rim, then we believe the current size of the planned country park is appropriate for the current Local Plan provided the other current open space (including sports space) requirements are implemented (including access to sports space at schools). An increase in accessible natural green space (and other outdoor space) will be required if further development to that under the current Local Plan is proposed for the revised Plan. The green rim needs to be geographically defined on a map.</p>	<p>Support noted but the green rim is unlikely to be mapped as the spaces must be brought forward as part of development proposals. A specific local plan allocation would not be appropriate.</p>	<p>249 90</p>
	<p>Save our Country Spaces SOCS</p>	<p>If there is no reduction in the green rim, then we believe the current size of the planned country park is appropriate for the current Local Plan provided the other current open space (including sports space) requirements are implemented (including access to sports space at schools). An increase in accessible natural green space (and other outdoor space) will be required if further development to that under the current Local Plan is proposed for the revised Plan. The green rim</p>	<p>Please see comment above.</p>	<p>250 47</p>

			needs to be geographically defined on a map.		
		Greenways Countryside Project	More accessible natural greenspace is required in addition to the new Garden Suburb country park to meet the needs of a growing population/biodiversity. Although very positive, the new GS country park is small for the numbers of people living in the area. Expansion of natural greenspace around the green rim (from the GS country park and generally) is vital to increase the diversity of greenspace offered and accessibility to more residents. Pond Hall Farm should be included within Orwell Country Park to allow visitors to be drawn away from the protected estuary on routes that will cause less disturbance to wildlife.	The Council recognises that the delivery of green infrastructure needs to be achieved through the provision of a patchwork of connected sites. Opportunities will be taken as they arise, and the local plan provisions will be monitored for its ability to deliver through the plan period.	253 49
		On behalf of RSPB	The RSPB welcomes the Council's intentions for providing greenspace as part of the Ipswich Garden Suburb. However, the Council should ensure that it meets Natural England's Access to Natural Greenspace Standard.	Public access to Green Infrastructure remains a plan priority.	247 59
		The Woodland Trust	We strongly support the Council's proposal to include a country park and around 20 ha of new woodland as part of the Ipswich Garden Suburb. We do not have sufficiently detailed knowledge of Ipswich to be	Support noted and the Woodland Trust's involvement will be also welcomed in the ongoing work of making quality land and spaces available for people to enjoy.	249 11

			able to recommend other areas for tree planting and woodland creation. However, we are ready to work with the Council on taking forward planting when you have identified suitable areas.		
		Ministry of Defence MOD	The aerodromes are protected with statutory birdstrike safeguarding consultation zones. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety.	The MOD will be consulted on relevant applications as they arise and are to include the "open water bodies" that are of concern.	248 15
		Ipswich Wildlife Group IWG	In addition to the new Garden Suburb country park, more natural greenspace will be needed for the benefit of the increased population and for wildlife. Expansion of natural greenspace around the green rim is vital to increase accessibility to more residents.	Comments accepted - please see comments above.	248 28
		Conservative Group	Personally, living in the North West of Ipswich I have never considered there to be a lack of green space in the area and was surprised when I saw the statistic. With that in mind I do not think there is the need for additional green space.	Comments noted but access to open space for all residents remains an important priority for the Council.	253 21
	Q94: What is the minimum size of development which	Suffolk Wildlife Trust	Whilst we appreciate that not all development can incorporate on-site open space, all developments can incorporate on-site greenspace. On small sites this can be achieved through the use of features such as	Comments noted	250 27

should be required to provide on-site open space?		green walls, green roofs and well-designed SuDS.		
	Northern Fringe Protection Group NFPG	Current standards are appropriate.	Noted	249 91
	Save our Country Spaces SOCS	Current standards are appropriate.	Noted	250 46
	Greenways Countryside Project	Very small open spaces often provide little benefit for people or wildlife. Therefore, on small sites it may be better to consider means to aggregate cash contributions to acquire and manage meaningful spaces across a wider area (rather than simply 'enhance' existing spaces). This would mean that all developments could contribute, and the overall area available and managed for people and wildlife would increase.	The ability to draw down cash contributions from smaller scale development to help bring together larger schemes of open spaces is constrained by the planning practice guidance and legislation concerning Planning Obligations which generally prevents pooling of funds - unless in the form of the Community Infrastructure levy which is governed by its own legislative framework.	253 50
	On behalf of RSPB	Whilst it may not be practical or possible to provide on-site open space for small developments, the integration of SuDS, green walls or biodiverse roofs are still possible and as well as adding to Green Infrastructure network can provide wider benefits too. The energy saving potential for green walls is quite significant. In the right situations this can be up to	Comments noted	247 57

			30% over winter in the right situations due to foliage insulation and a reduction in wind chill to building envelope). For public buildings there are the benefits of summer cooling which can reduce air conditioning requirements.		
	Q95: Which models for managing open spaces are effective?	Suffolk Wildlife Trust	With regard to maximising the biodiversity value of open spaces, we consider that strategic management as part of the wider network of sites is likely to be most beneficial.	Comments Noted	250 28
		Greenways Countryside Project	Management of open spaces by local authorities (often in partnership with each other and specialist organisations such as Suffolk Wildlife Trust) is the most likely to maintain the wildlife benefit and provides local accountability and a fair distribution of the costs. Management companies and contractors are less likely to sensitively manage wildlife habitats and are not accountable.	Comments noted	253 56
		The Woodland Trust	We recognise that the cost of maintenance of landscapes/open space is a significant issue for councils. We would ask you to consider planting of small areas of woodland on existing areas of grass, where these are less well used, or in new developments to put in woodland before the houses are built. Our report, Trees or Turf shows clearly that woodland gives many more environmental, social	The promotion of new woodland fits with the council's strategy to continuously increase the green canopy in and around the town. Comments noted	249 13

			and economic benefits than does short mown grass (e.g. carbon sequestration, removal of pollutants from the atmosphere, shading of buildings in summer etc) and can also be managed significantly more cheaply.		
		Ipswich Wildlife Group IWG	Management of open spaces by local authorities in partnership with specialist organisations such as Suffolk Wildlife Trust is the strategy most likely to maintain the wildlife benefit and provide accountability.	Comments Noted	248 29
	Q96: Are there existing routes around the fringe of Ipswich for cycling and walking that could form the core of the	Suffolk Wildlife Trust	We consider that it is not possible to put forward a definitive figure for the width of the proposed 'green rim' as this will depend on a number of factors, including existing habitat features, existing land uses and the target habitats and species for the particular areas. The 'green rim' needs to be as wide as possible and also be connected to existing (and any new) green routes that run through the town.	These comments are noted and will accord generally with the approach the Council uses as future development packages are progressed through the plan process. The issue will be at the heart of major schemes that may arise in the peripheral areas around the existing boundary of the plan area. Each site will be expected to contribute in compliance with the NPPF and having regard for the viability assessment for the site.	250 29

<p>green rim? How wide would the green rim need to be in order to be an effective recreational and wildlife resource?</p>	<p>River Action Group RAG</p>	<p>Whilst the river corridor does not form part of the green rim as such, it is the best and most continuous 'spoke' from the middle of the town to the green rim. As well as being a vital wildlife corridor, the river paths and associated open spaces provide much needed opportunities for people in a part of the town with limited access to open space, especially other natural or semi-natural spaces.</p> <p>The River Action Group would like the plan to reflect this importance and propose better management and more opportunities for formal and informal recreation along the river, by protecting existing undeveloped land and seeking to deliver items identified in the Ipswich River Management Plan, 'A River For All' (approved in draft form by IBC Executive in December 2012 and currently being updated by the RAG). Key future aspirations of the RAG are also contained in its 'Manifesto' for 2016-2021, published last year (copied below as Appendix 1).</p>	<p>The importance of the River as wildlife corridor and recreation space are accepted and will be maintained via policy protection. Ongoing management of the cycle paths and footpaths in the corridor cannot be achieved through planning obligations but specific improvement schemes that can be related to development proposals will be considered on their merits within the Local Plan policy.</p>	<p>249 36</p>
	<p>Greenways Countryside Project</p>	<p>Strong support for the 'green rim' concept. It exists in places already from a wildlife perspective, especially Belstead Brook Park, Orwell Country Park and soon hopefully in the Garden Suburb country park. In other areas there is a need to maximise the space</p>	<p>Support welcomed.</p>	<p>253 51</p>

			available to keep future options open. It is worth protecting open space in the green rim even if a continuous public foot/cycle and recreation space corridor cannot always be achieved.		
		On behalf of RSPB	<p>Enhancing any existing routes around the fringe of Ipswich which are not going to impact upon the network of designated sites would be a logical progression for forming the core of the green rim.</p> <p>It will be important that cyclists and walkers are accommodated by separate paths to ensure that conflict does not arise between the two user groups.</p> <p>The width of the green rim should not be fixed, as it needs to take in to account existing habitat features and sensitives. Evidence for landscape-scale conservation clearly sets out that the wider and more connected the better.</p>	Comments noted	24758
		Private individual	<p>Great to see that the new plan considers sustainability and climate change. For a successful green rim, a holistic approach is needed. Ipswich certainly has cycling and walking routes, however, especially for cycling these unexpectedly stop very often. I feel the new plan should consider the 're-creation' of new cycling/walking routes, using the existing infrastructure but also</p>	Achieving an improved degree of connectedness will remain an overarching objective for this policy.	24800

			creating new infrastructure that will include IBC and expand to Suffolk areas. For a wildlife resource, you need strong focal points but a continuous network to support it.		
		Ipswich Wildlife Group IWG	We strongly support the green rim concept. Belstead Brook Park, Orwell Country Park and the planned Garden Suburb country park form an existing basis for the green rim. In other areas, regardless of size, the open space is worth protecting as a link within the green rim.	Comments welcomed	248 30
	Q97: How can the Ipswich Wildlife Network be further enhanced and linked into surrounding areas?	River Action Group RAG	<p>The Group would like to see the Plan identify and protect areas of undeveloped land alongside the river for wildlife (and public access) benefit. Proper maintenance and monitoring of the habitats and corridor is essential to ensure the wildlife network functions are delivered, and additional resources are required for this.</p> <p>A strong link along the corridor into Babergh district is vital - the river corridor as a route for people and a vital part of the wildlife network, doesn't stop at the Borough boundary. Closely linked policies in the neighbouring Local Plans would ensure sensible continuity of purpose.</p>	Comments noted. The Council will explore the possibility of creating wildlife links along the river corridor.	254 96

		Suffolk Wildlife Trust	The network needs to explore links into and out of the 'green rim', both into town and out into the surrounding districts. A joined up cross boundary approach should be taken to delivering the network on the edge of town and in Suffolk Coastal DC, Babergh DC and Mid Suffolk DC.	Comments noted. The Council will explore the possibility of creating green links with surrounding districts.	250 30
		Greenways Countryside Project	The wildlife network of the town is excellent, but needs adequate resourcing to ensure efforts to maintain, enhance and monitor it are sufficient (i.e.: the Greenways Project/Parks Service). In order to greatly improve the value of the network, it is clear that links into the surrounding districts are vital for it to be truly meaningful. Continuity could be achieved by the neighbouring districts having similar networks (and related planning policies) for the relevant areas around the fringes of Ipswich. This would ensure vital connections are maintained across political boundaries.	Comments noted. The Council will explore the possibility of creating green links with surrounding districts.	253 52
		On behalf of RSPB	On a wider scale, extending the network across the IHMA through co-operation with neighbouring planning authorities is the first step. Integrating SuDS in to new developments (see earlier representations on Q74/75) and retrospectively will enhance the network whilst at the same time	Comments noted. The Council will explore the possibility of creating green links with neighbouring planning authorities. Furthermore, the Council recognises through policy DM4 that SUDs are an important method of reducing flood risk.	247 56

			<p>offer wider socio-economic benefits as previously stated.</p> <p>Working in effective partnership across agencies is critical to effective delivery.</p>		
		Ipswich Wildlife Group IWG	<p>To improve the value of the Wildlife Network, creating links with surrounding districts would increase its value and effectiveness. Continuity could be achieved by the neighbouring districts having similar networks for the relevant areas around the fringes of Ipswich. This would ensure vital connections are maintained across political boundaries.</p>	<p>Comments noted. The Council will explore the possibility of creating green links with surrounding districts.</p>	248 31
	Q98: Should more areas of the Borough be designated as Local Nature Reserves, and if so where?	Suffolk Wildlife Trust	<p>We support the recognition of the nature conservation value of sites through appropriate designation. Whilst we support LNR designations, this requires an element of public access which may not be compatible with the habitats/species present. If the LNR designation doesn't prove suitable, consideration should be given to designating them as County Wildlife Sites. We recommend that a review is undertaken of all of the existing parks/open spaces with a view to designating any which meet the criteria. Areas bordering existing LNRs, e.g. Kiln Meadow which is adjacent to Spring Wood LNR and Bobbits Lane LNR, should be considered for designation.</p>	<p>Comments noted.</p>	250 31

		Northern Fringe Protection Group NFPG	Yes. These could form part of the green rim.	Comment noted.	249 92
		Save our Country Spaces SOCS	Yes. These could form part of the green rim.	Comment noted.	250 45
		Greenways Countryside Project	<p>Local Nature Reserve designation affords proper protection for areas valued by people and wildlife. New LNRs should be designated at: Holywells Park; Christchurch Park; Chantry Park; Bourne Park; Ellenbrook Meadow and open space; Gippeswyk Park, the Garden Suburb Country Park; Braziers Wood (the only Ancient Woodland within the Borough); Braziers Meadow and Ravenswood open spaces; Pond Hall Farm; Landseer Park; Bramford Lane open space; Stonelodge Park; and Bramford Road Recreation ground.</p> <p>Also, any site which is used as a receptor site for reptiles, being translocated from development sites, should also be given LNR status to ensure ongoing protection and management.</p>	Comments noted.	253 53
		On behalf of RSPB	Yes. The Council should conduct a review of any significant areas of greenspace, i.e. the Parks network and designate any of these as Local	Comments noted.	247 60

			Nature Reserves to ensure their statutory protection for not only the life of this plan, but for generations to come.		
		Ipswich Wildlife Group IWG	Yes, Local Nature Reserves protect areas valued by people and wildlife. We suggest the following sites should be considered for Local Nature Reserve status: Holywells Park; Christchurch Park; Chantry Park; Bourne Park; Ellenbrook Meadow and open space; Gippeswyk Park, the Garden Suburb Country Park; Braziers Wood, Braziers Meadow and Ravenswood open spaces; Pond Hall Farm; Landseer Park; Bramford Lane open space; Stonelodge Park; and Bramford Road Recreation ground.	Comments noted.	248 32
Sport and Leisure	Q99: Does Ipswich offer the appropriate mix of sport and leisure facilities you would expect in a town of its size? What other facilities could it offer?	River Action Group RAG	The river and its associated paths and open spaces offer a safer, traffic-free route for local people along with the chance to improve health and wellbeing from immersion in high quality green space. The river path is well used for running, but new surfaces, paths and links would increase use. The installation of a 'trim trail' would also increase use of the corridor as well as providing for health and fitness improvements. The river itself is currently underused as a sporting resource.	The Council has recognised the importance of the River and pathways running through the town for their contribution to the green /blue corridors identified in the Plan. Specific initiatives, like those suggested, to increase the use of these corridors will need to be the subject of further discussion with the Council's Sports and Leisure Services.	254 97

			The new Plan should recognise this opportunity and seek to identify suitable locations for providing access to the water. A launch facility could be linked to a riverside centre with canoe club facilities. Sites are now limited and our preferred option is the land bordering the river and Alderman Canal north.		
		Ipswich Community Media	There is a good mix - but many of the young people simply can not afford to swim - they really want to do this - can there be a better deal - i.e. cheap day swims etc.?	Comments noted. Ipswich Borough Council (Sport and Leisure Services) offer a range of facilities, including swimming and there is a comprehensive concession policy ensuring that those families on low incomes are able to make use of all our facilities. The Council will maintain its commitment to the delivery of leisure and recreation initiatives such as this year's free Young Person iCards for all the school age Ipswich children, allowing free use of facilities for the 6 weeks of the summer holidays.	254 77
		Sports England	Policies relating to provision for sport should be based on the findings of the Ipswich Playing Pitch Strategy (2015) (for outdoor sport), and the Ipswich Sports Facilities Strategy (2015) (for indoor sport). These assessments used the approved Sport England methodology for such studies and are therefore considered to be a robust evidence base on which to inform local plan policy.	Comment noted.	248 80
		Northern Fringe Protection Group NFPG	No. It needs more outdoor sports space in areas where a deficit has been identified. Easy access for the general public to new schools on the Ipswich Garden Suburb must be agreed under planning conditions for the schools and enforced	Comments noted. The Sports Council have supported the Ipswich Playing pitch strategy and this will be used as a "robust" evidence base to support requests for an appropriate level of additional provision to accompany new development.	249 93

			accordingly. New developments should be accompanied by a corresponding increase in provision.		
		Save our Country Spaces SOCS	No. It needs more outdoor sports space in areas where a deficit has been identified. Easy access for the general public to new schools on the Ipswich Garden Suburb must be agreed under planning conditions for the schools and enforced accordingly. New developments should be accompanied by a corresponding increase in provision.	Comments noted, please see comments above.	250 44
		Suffolk Chamber of Commerce	The parks in Ipswich and especially Chantry, Christchurch and Holywells are wonderful assets for residents and tourists alike as are wilder green spaces such as Orwell Country and Belstead Brook Parks. These areas must be preserved, extended where possible, and Plan policies developed that might further enhance biodiversity in the town.	Support for the Council's approach (which is to be maintained) is welcomed.	251 73
		Private individual	A parkour club for older children would be beneficial for the IP2 area. Youngsters in Chantry have a massive interest in parkour but no means to practise their interest. They use what they have, which can cause breakages. Currently only Pipers Vale offers this kind of club on Mondays until 10pm so it is not viable for youngsters from Chantry to get there - e.g. 2 buses home. It would be dangerous for children to make this journey. There are	Comments noted - this matter will be considered further as part of the ongoing planning process and further information may be requested.	247 94

			various suitable places the most ideal being Chantry Academy's new sports facility, Goals, Stoke. The space is there.		
		Environment Agency	This section could expand upon the use of multifunctional open spaces to contribute towards sport and leisure provision. These spaces provide playing fields and amenity space, which improve the physical health and mental wellbeing of the community. The Plan should take an integrated approach to combine the provision of sports and leisure with open space and biodiversity to best benefit people and wildlife.	The EA ethos explained in this response also lies at the heart of the Plan approach to the town's green rim public open space and alternative transport policies.	251 85
		Ipswich Community Media CIC	We have no arts centre or cultural quarter - we have lost millions of pounds of inward investment because of this over the years.	The town has a strong artistic heritage with the performing arts catered for in a dispersed pattern of facilities. Other art forms have been addressed within other facilities (such as Christchurch mansion or the Town Hall) on an occasional basis, but the plan recognises that a central facility either within the town centre or on the waterfront would bring significant benefits to the town. Policy SP14 concerning the delivery of arts, culture and tourism will therefore be retained.	252 54
		Ipswich Limited	Ipswich has inadequate sport and leisure facilities outside of educational establishments.	The Local Plan evidence base prepared in conjunction with the Sports Council has not identified a shortfall in provision. However, the delivery of the expected development through the plan period should not create such a shortfall and new facilities will sought as part of the planning and development process, in accordance with Policy CS16.	254 28
		Conservative Group	If we want Ipswich to be considered as a regional 'hot-spot' for leisure activities, then we need to increase	Comments noted	253 22

			the scope and quality of our services. We need to be bold in our visions and innovative with our ideas not stuck with 20th century standards in a 21st century world.		
		private individual	There is nothing for the people of Ipswich to make them stay.	Please see comments above	255 07
		Private individual	Make use of school/university facilities for further use by charities/social organisations.	The policies of the local plan are generally supportive of shared uses of the existing facilities	255 16
		Private individual	Improve the leisure offering in town	Please see comments above	255 22
		private individual	Install posts next to the grass verges in roads in and out of the town centre to stop people parking and ruining the verge, it gives a poor impression to visitors. I think the town would also benefit from more free parking, it is far too expensive at the moment. Pay and display car parks are also a bad idea, they discourage people from staying, shopping and eating in Ipswich, as they are always rushing back to the car to avoid a ticket.	Where parking restrictions exist on the carriageway these also apply to the adjacent verge and footway. These can be enforced by the Council's Civil Enforcement Officers.	255 28

Demography, Social Inclusion and Health	Q100: How should we best plan for an ageing population in the Borough?	Suffolk County Council SCC	Suffolk's population is ageing at a faster rate than the national average. Meeting the needs of older people, with housing and the built environment designed to reflect changing requirements, offers a chance to improve older people's independence and quality of life whilst also contributing to reductions in overall demand for health and care services. IBC should give detailed consideration to retaining or expanding the policy requirement that a proportion of new homes be built to the optional standards allowed for through the Deregulation Act 2015. IBC should also consider the need to make specific allocations for housing with care.	Comments noted - The Council's response to planning for an ageing population will come with several key elements. Design guidance emerging for Ipswich's public realm will ensure that streets in the town centre can be easily understood and offer clear visual features that help to reduce opportunities for misunderstanding. The housing provision will continue to seek a mix of new homes in accordance with an updated strategic housing market assessment (policy CS8) and policy DM12 will encourage the delivery of the "homes for life" standard in larger housing developments. There seems to be a good level of response from the housing market to the delivery of "housing with care" and the Strategic Housing Market Assessment currently suggests a surplus in the type by the end of the plan period. Specific allocation does not appear warranted at this stage however, the matter will be scrutinised as part of the review process.	254 35
		Suffolk Constabulary	Older people can be more vulnerable than other members of the community, therefore any purpose built accommodation must be built to SBD standards. Design Out Crime Officer advice should be sought prior to planning purpose built accommodation to ensure that it is not located in known crime hotspots where a disproportionate level of distress may be caused to residents.	Comments noted. Secured by Design liaison will continue to be welcomed as part of the application process. In addition to creating sound residential areas the Council will also try to enhance the public realm as part of its drive for Alzheimer friendly environments.	248 56
		Private individual	By planning for various age ranges. I understand "old" means over 55. 55 year olds have different needs than over 65's; over 75's, over 85's	Please see comments above	247 52

			<p>over 95's.</p> <p>Over 55's do not just want to move to sheltered accommodation.</p>		
		Gladman Developments	<p>The provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach. The Council need to have a robust understanding of the scale of this type of need across the District. Therefore, in addition to the above suggested policy wording, which provides a positive framework in relation to sites which may come forward for extra care developments Gladman recommend that specific site allocations for this type of specialist housing should also be identified and included within the Local Plan.</p>	Please see comments above in response to SCC	253 94
		Ipswich Limited	<p>We should encourage - through collaboration with the neighbouring district council for retirement housing and care homes to be concentrated in Felixstowe and the Suffolk Coast.</p> <p>We should encourage (not force) a better environment absent of the hazardous pollution associated with Ipswich, which should extend their life through better health and well-being of the ageing population.</p> <p>This would unlock existing housing</p>	The Council will continue to cooperate with the partner authorities operating within the housing market area identified for the town and its surrounding area. The Council's policies will not be able to intervene in the market in the manner or to the extent suggested.	254 29

			stock, avoiding the need to build so many new poor quality developments, and best of all should reduce the demand for burial plots in the town each year.		
	Q101: The current Local Plan safeguards land for new or extended primary schools and sets out standards for children's play provision. Are other planning responses needed for the relatively younger demographic in Ipswich?	Suffolk County Council SCC	The County Council welcomes that the Borough Council has these measures in place and would like to see them continued. As with consideration of the ageing population, consideration could be given to the way in which children and younger people interact with the built environment.	Comments noted.	254 34
		Gladman Developments	Given the existing evidence in relation to ageing populations, and the national strategy in relation to housing for older people, Gladman recommend that the Local Plan should include a specific policy in relation to the provision of specialist accommodation for older people.	The Council will maintain its commitment to the arts and theatres in the Town Centre (Policy CS14) and in Policy DM22.	251 13

<p>Q102: In what other ways could the land use plan help to tackle issues of deprivation and inequality in Ipswich?</p>	<p>Theatres Trust (Planning Adviser)</p>	<p>The NPPF provides clear directions to LPA about safeguarding/promoting cultural activities/venues.</p> <p>One of the 12 core planning principles (para.17) is the need to plan for culture to support social wellbeing/sustainable communities.</p> <p>Para.23 recognises the important role town centres play in supporting communities and notes that cultural venues make a valuable contribution to the vibrancy and success of these centres.</p> <p>Para.70 states that in 'promoting healthy communities', planning decisions should 'plan positively for cultural buildings' and 'guard against the loss of cultural facilities/services.'</p> <p>Para.156 directs LPA to ensure their LP includes cultural policies that reflect the NPPF.</p>	<p>The importance of the issue is recognised by the proposed segregation of the matter (from a hybrid policy) to a dedicated Air Quality management policy.</p>	<p>249 94</p>
	<p>Northern Fringe Protection Group NFPG</p>	<p>The most obvious means is to improve air quality in AQMAs. IBC has ignored this major health issue and inequality in Ipswich for far too long.</p>	<p>See above</p>	<p>249 95</p>
	<p>Save our Country Spaces SOCS</p>	<p>The most obvious means is to improve air quality in AQMAs. IBC has ignored this major health issue and inequality in Ipswich for far too long.</p>	<p>Comments noted - although they cannot be addressed through the land use planning system.</p>	<p>250 43</p>

	Q103: How else should the Local Plan tackle health inequalities ?	Ipswich Community Media	Emerging communities are not understanding advice / letters / appointments, missing them and then losing all rights to attend dentist etc. - the repercussions we are seeing - terrible teeth and no glasses for kids - supporting this and encouraging a campaign to support all people to understand how the systems work. ICM / SRS can help	The Council has tried to address each of these issues throughout the plan review process.	254 78
		Suffolk County Council SCC	Public health intersects with many areas of the planning system. The Joint Health and Wellbeing Strategy for Suffolk (refreshed in 2016) identifies four strategic outcomes with four cross cutting themes (see full comments). The plan should: make provision for play space on allocated sites and safe walking and cycling routes; include additional standards for accessible homes; increase the number of accessible homes in Ipswich; include dementia-friendly design. IBC should consider whether Building for Life Guidelines are sufficient, or whether to produce more detailed local design guidance. Access to the natural environment improves mental and physical health and wellbeing, prevents disease and helps people recover from illness. Green space delivered through the Local Plans, can help to reduce health inequalities.	The importance of the issue is recognised by the proposed segregation of the matter (from a hybrid policy) to a dedicated Air Quality management policy.	254 36

		Northern Fringe Protection Group NFPG	Improving air quality should receive greater focus and new developments must demonstrate that they will not worsen air quality before gaining planning consent.	See above	249 96
		Save our Country Spaces SOCS	Address Air Quality issues within Ipswich as a priority.	Comments noted	250 37
		Gladman Developments	The Framework (paragraph 69) also recognises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The development of sustainable new communities through strategic allocations within a local plan (crossing local authority boundaries where necessary) provides the opportunity to embed the principles of garden settlements and in doing so integrate an approach that will ensure that an attractive environment is developed to support the formation of healthy and sociable communities.	Comments noted	253 95
		Ipswich Community Media CIC	Would be happy to pay more for investment in poorest areas.	These objectives are noted.	252 55
Any Other Issues?	Q106: Parts 1 and 2 of this consultation paper have considered many	Ipswich Community Media	We want the arts, creativity and real grass roots opportunities. We would like to see equal chances to access the arts - as 100% of our young people are not attending any of the Wolsey young theatre groups - but have got seismic skills. Dance east are being fantastic at supporting us	The local plan review has attempted to respond in the manner suggested.	254 79

<p>different issues affecting Ipswich. Are there any other issues not mentioned here, which relate to land use in Ipswich, about which you would like to comment?</p>		<p>now - and we are all seeing the benefits, including community cohesion.</p>		
	<p>Theatres Trust (Planning Adviser)</p>	<p>Local plans should support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities and promote cultural led development as a catalyst for wider regeneration in town centres.</p>	<p>The Council has responded to the Minerals and Waste Plan and awaits further response as the respective plan aims will need to be resolved under the duty to cooperate.</p>	<p>249 85</p>
	<p>Suffolk County Council SCC</p>	<p>Minerals and Waste issues are not a natural fit under any of the headings provided. However, they are of relevance to the development of the Plan. IBC will be aware that the County Council is currently developing a new Minerals and Waste Local Plan for Suffolk. Ipswich Borough Council will need to be most aware of the safeguarding policies designed to protect the use of waste sites and the use of various kinds of minerals sites as well as minerals resources. See full comments for relevant draft policies.</p>	<p>Advice and comments noted.</p>	

		Historic England HE	Protection of the historic environment should be fully taken into account at all stages and levels of the local planning process. We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review them as part of your local plan development, alongside our Conservation Principles. In preparation of the forthcoming local plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups. Absence of a comment on an allocation or document in this letter does not mean that Historic England is content with it.	The local plan review has addressed the issues raised in the National Planning Policy Framework. Prospective developers can make use of the policy guidance which the Local Plan makes available to inform the application process and Development Management staff will assist through the pre-application advice system. Details are available through the Council website.	248 90
		Suffolk Chamber of Commerce	Planning processes and decisions should be supportive of private sector investment and job creation and must be undertaken in a timely manner across all of the topic areas with clear timetables and dedicated support for those businesses new to the planning process or unable to buy in specialist support.	Comments noted. The Council is working with the New Anglia LEP to assist the local economies of the region.	251 56
		Private individual	Community growing spaces should be encouraged. This could go further than simply allotments, but herb beds could be located along district centres and in some brownfield sites where volunteers could grow food for the community. Where appropriate landscaping schemes could include fruit bearing	Comments noted.	246 77

			trees which again could be eaten by the wider community. This would improve community spirit bringing people together.		
		Private individual	Ipswich has a rich history; it has some of the finest buildings in the country and I am not referring to some of the so called high spec buildings built since the 60s. It's time to shout about our history and build on it. We are not a London over spill. Suffolk is built on hard work and graft it is not based on pie in the sky. The town should serve the county. It would be great to see both the council and the county council work together to keep Ipswich together.	The Council will continue with its public realm improvements and design management policies to seek a quality for the town which reflects its heritage..	248 38
		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	NHS England and the CCG will have further comments to make as details of specific developments become available. In order to provide a more detailed response, a clearer understanding of phasing and anticipated trajectory will be required. Increase in the provision of assisted living developments and residential care homes, although a necessary feature of care provision and to be welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage at	Council Officers have made information available to the CCG and welcomes the on-going dialogue.	249 12

			<p>a very early stage with the NHS, to plan and implement suitable mitigations.</p> <p>It is also important we continue to be consulted in relation to emerging Neighbourhood Plans in order to work with local communities to deliver and maintain sustainable healthcare.</p>		
		Environment Agency	<p>No mention is made of the Ipswich Tidal Flood Barrier and associated flood defences or to foul drainage capacity in Ipswich. Both topics are raised in the Sustainability Appraisal Scoping Report and should also be included here. If a Community Infrastructure Levy is to be adopted, we would welcome contributions towards flood risk infrastructure such as the future maintenance of the tidal barrier and existing tidal and fluvial defences. Also, the River Gipping and Orwell Estuary are overlooked in the plan. The Gipping is a neglected asset. Include proposals to enhance its visual and ecological quality and maintain water quality.</p>	<p>The Council is proposing to ensure the River Gipping and Orwell estuary are seen as an important part of the corridors that traverse the borough with a view to safeguarding them as habitat, wildlife corridors and acceptable corridors for cycling and walking.</p>	251 80
		Ipswich Limited	<p>I would strongly welcome the borough council to explore adding such flexibility into planning policy. The borough council needs to work with landowners and developers, rather than alienate them.</p>	<p>Comment noted</p>	254 30

			The council needs to inject confidence into the Princes Street office corridor area by building the third office block.		
		Private individual	Have less unused abandoned buildings that could be used for housing / social uses. Sort out the 'wine rack' building.	Comments Noted - the 'Winerack' has now been restarted	255 17
		Private individual	IBC needs to cover a bigger area i.e. you have a number 4 bus from the town centre to Martlesham Heath. You need to have Kesgrave and Martlesham Heath areas as part of IBC.	Comments noted. The Borough boundaries are set by the Boundary Commission.	255 10