

Ipswich Borough Council Local Plan

Representations made in Response to Consultation at Main Modifications Stage in Document and Main Modifications Order

October 2021



Please note - Personal data has been redacted from this document in accordance with the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679). However, as part of our public task the full details of representations have been shared with the Planning Inspectors and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

Representors were advised of the Council's Privacy Policy during the consultation via the Proposed Main Modifications [webpage](#), the Proposed Main Modifications Consultation Representation Form, the Policies Map Changes Consultation Representation Form and Guidance Note to Accompany Consultation Representation Forms.

Core Strategy and Polices Development Plan Document (DPD) Main Modifications

Record count: 73

MM1 - Page 4, Paragraph 1.2**26737****Support****Respondent:** Ministry of Defence**Summary:**

There are two areas of interest for the MOD, these being RAF Wattisham and the East 2 WAM network (a new technical asset consisting of a network of linked sites, whereby statutory safeguarding zones have been designed to ensure development which might impact on the operation and capability of both the linked sites, and the links between them, will result in consultation).

The MOD have no concerns to the Core Strategy and Policies Development Plan Document Main Modifications.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM3 - Page 30, Paragraph 6.8**26718****Object****Respondent:** Northern Fringe Protection Group**Summary:**

The proposed modification still fails to include an objective for AIR QUALITY "to contribute towards compliance with relevant limit values" as required under the NPPF (and legally binding air quality legislation). The proposed modification is therefore neither effective, nor consistent with national policy. We suggest that IBC should ensure compliance with legally binding targets by 2024, which would be 16 years since the publication of IBC's first Air Quality Action Plan in 2008 and consistent with IBC's current Air Quality Action Plan 2019-2024. The AQAP should have been designed to ensure compliance with legally binding limit values for it to have been approved by Councillors as fit for purpose; so there is no reason why 2024 should not be included in the Plan. If 2024 is not accepted by IBC, then it clearly illustrates that the current AQAP is inadequate and needs to be urgently revised to ensure compliance.

Change suggested by respondent:

MM3 needs to be further amended to read:

"Every development should contribute to the aim of compliance with relevant air quality limit values for pollutants in Ipswich by 2024 (by eradicating AQMAs)".

This is justified as it would help prevent further un-necessary deaths and instances of respiratory illness in Ipswich.

Legally compliant: No

Sound: No

Attachments:

26764

Object

Respondent: Save Our Country Spaces

Summary:

The proposed modification still fails to include an objective for AIR QUALITY "to contribute towards compliance with relevant limit values" as required under the NPPF (and legally binding air quality legislation). The proposed modification is therefore neither effective, nor consistent with national policy. We suggest that IBC should ensure compliance with legally binding targets by 2024, which would be 16 years since the publication of IBC's first Air Quality Action Plan in 2008 and consistent with IBC's current Air Quality Action Plan 2019-2024. The AQAP should have been designed to ensure compliance with legally binding limit values for it to have been approved by Councillors as fit for purpose; so there is no reason why 2024 should not be included in the Plan. If 2024 is not accepted by IBC, then it clearly illustrates that the current AQAP is inadequate and needs to be urgently revised to ensure compliance.

Additional information regarding public health and air quality included which should have been attached to Core Document Library document K13.

Change suggested by respondent:

MM3 needs to be further amended to read: "Every development should contribute to the aim of compliance with relevant air quality limit values for pollutants in Ipswich by 2024 (by eradicating AQMAs)". This is justified as it would help prevent further un-necessary deaths and instances of respiratory illness in Ipswich.

Legally compliant: No

Sound: No

Attachments:

26733

Object

Respondent:

Summary:

This wording is very non-committal, and unenforceable, using words such as "should" and "aim". I believe the Council has a duty to be proactive on key issues such as Air Quality and Climate Change, however with such wording there is nothing to encourage development which will improve air quality and lessen the impact of climate change.

Change suggested by respondent:

I believe the Council should be using wording as follows:

"5. AIR QUALITY AND CLIMATE CHANGE - Every development must contribute to the target of reducing Ipswich's carbon emissions below 2004 levels.'

Legally compliant: No

Sound: No

Attachments: None

MM8 - Page 37, Paragraph 8.9**26749****Object****Respondent:** East Suffolk Council**Summary:**

Table 8.1, setting out the housing need across the Ipswich Housing Market Area is proposed to be updated to include the more recent figures as calculated under the standard methodology. Whilst these figures reflect the ISPA Statement of Common Ground published in June 2020 (document A21 in the Core Document Library), the figure of 542 dwellings per annum, that is proposed to be deleted, is the housing requirement that has been adopted in the Suffolk Coastal Local Plan and it may therefore be more appropriate to incorporate this figure into any calculations of proposed ISPA-wide housing growth.

Change suggested by respondent:

Change the figure in Table 8.1 for the Suffolk Coastal Local Plan to 542 dwelling per annum.

Legally Not specified
compliant:

Sound: Not specified

Attachments:

MM9 - Page 38, Table 8.1**26750****Object****Respondent:** East Suffolk Council**Summary:**

Table 8.1, setting out the housing need across the Ipswich Housing Market Area is proposed to be updated to include the more recent figures as calculated under the standard methodology. Whilst these figures reflect the ISPA Statement of Common Ground published in June 2020 (document A21 in the Core Document Library), the figure of 542 dwellings per annum, that is proposed to be deleted, is the housing requirement that has been adopted in the Suffolk Coastal Local Plan and it may therefore be more appropriate to incorporate this figure into any calculations of proposed ISPA-wide housing growth.

Change suggested by respondent:

Change the figure in Table 8.1 for the Suffolk Coastal Local Plan to 542 dwelling per annum.

Legally Not specified
compliant:

Sound: Not specified

Attachments:

MM12 - Page 39, Policy ISPA1

26729

Support

Respondent: National Highways (Formerly Highways England)

Summary:

We note the slight reduction in overall housing numbers proposed during the plan period, this is likely to have little impact on the transport implications of the local plan growth.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26751

Object

Respondent: East Suffolk Council

Summary:

Table 8.1, setting out the housing need across the Ipswich Housing Market Area is proposed to be updated to include the more recent figures as calculated under the standard methodology. Whilst these figures reflect the ISPA Statement of Common Ground published in June 2020 (document A21 in the Core Document Library), the figure of 542 dwellings per annum, that is proposed to be deleted, is the housing requirement that has been adopted in the Suffolk Coastal Local Plan and it may therefore be more appropriate to incorporate this figure into any calculations of proposed ISPA-wide housing growth.

Change suggested by respondent:

Change the figure in Table 8.1 for the Suffolk Coastal Local Plan to 542 dwelling per annum.

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM13 - Page 40, Paragraph 8.19

26734

Object

Respondent:**Summary:**

My Strong objection to this main modification is that by changing the wording so significantly it is trying to push through a policy to support the Council's development plans, for increased housing in the planned Ipswich Garden Suburb, rather than considering the realistic impacts that such a development will have on the road system in Ipswich.

Change suggested by respondent:

I don't believe that dismissing text relating to the Northern Bypass can be made so lightly, without a full impact assessment of what the impact of there no longer being a Northern Bypass has on the proposals for the Ipswich Garden Suburb. I don't believe the Ipswich Garden Suburb can realistically go ahead without the Bypass, without significant impact on roads and travel in Ipswich.

Legally compliant: No

Sound: No

Attachments: None

MM14 - Page 40, Policy ISPA2

26752

Support

Respondent: East Suffolk Council**Summary:**

The proposed changes which include the addition of new criteria g) and h) to Policy ISPA2 'Strategic Infrastructure Priorities' reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26775

Support

Respondent: Associated British Ports**Summary:**

ABPorts would like to see improvement of the junctions on the A14 around Ipswich in order to accommodate existing and future growth. ABPorts 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 (this is referred to in the final paragraph of the consultation comments form in response to Policy CS20 & paras 8.222 - 8.225).

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26730

Object

Respondent: National Highways (Formerly Highways England)**Summary:**

We welcome the policy ISPA 2 reference to improvements to the A12 and A14 however, these are not described or defined in any detail. We welcome policies which which promote walking, cycling and public transport.

Should the policies be reordered to reflect national policy ie put walking, cycling and public transport in front of physical highway improvements.

Change suggested by respondent:

Reorder the list of Policy ISPA2 to reflect national policy.

Legally compliant: Not specified

Sound: Not specified

Attachments:

26735

Object

Respondent:**Summary:**

My Objection to this main modification is the same as for MM13 above.

Again, the Northern Bypass is struck out of the wording and disregarded, without consideration of the impacts this has on other parts of the Local Plan, especially the Ipswich Garden Suburb (CS10)

Change suggested by respondent:

The local plan must consider the impacts of the proposed Ipswich Garden Suburb now that the Northern Bypass is not going ahead.

I believe this wording warrants a much deeper study and consultation on the impacts of the Ipswich Garden Suburb on the Ipswich road system, rather than a modification to some text in a policy.

Legally compliant: No

Sound: No

Attachments: None

MM15 - Page 40, Paragraph 8.21

26753

Support

Respondent: East Suffolk Council**Summary:**

The proposed changes set out under MM15 and MM16 to paragraph 8.21 and Policy ISPA3 'Cross-boundary mitigation of effects on Protected Habitats and Species' reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM16 - Page 41, Policy ISPA3

26754

Support

Respondent: East Suffolk Council

Summary:

The proposed changes set out under MM15 and MM16 to paragraph 8.21 and Policy ISPA3 'Cross-boundary mitigation of effects on Protected Habitats and Species' reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26813

Support

Respondent: Natural England

Summary:

Natural England has no comment to make in regard to the Core Strategy and Policies Development Plan Document Main Modifications.

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Attachments:

MM17 - Page 41, Policy ISPA4

26755

Object

Respondent: East Suffolk Council

Summary:

The SoCG between East Suffolk Council and Ipswich Borough Council (June 2020) (A25) set out agreement on some changes to the policy and it is noted that these changes are proposed to be incorporated. These changes bring the policy into closer alignment with Policy SCLP12.24. The Council also supports the proposed deletion of reference to Suitable Alternative Natural Greenspace being provided on both sides of the boundary, for the reasons set out in our response at Regulation 19.

For clarity a change to one part of the proposed modifications to this policy is suggested.

Change suggested by respondent:

Change one part of the proposed modifications to this policy to read as follows "23.28ha of land at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated under Policy SCLP12.24 in the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site."

Legally compliant: Not specified

Sound: Not specified

Attachments:

26769

Object

Respondent: Rushmere St Andrew Parish Council

Summary:

Rushmere St Andrew Parish Council would request reference to not only a protective buffer between settlements but also a protected buffer between the development and Tuddenham Lane and Severn Cottage Lane and that access is not provided from these lanes. The mentioned lanes are in the process of being designated as quiet lanes.

Reference should be included in the policy to the need for a footpath that links Humber Doucy Lane and Tuddenham Road.

Change suggested by respondent:

Rushmere St Andrew Parish Council would request reference to not only a protective buffer between settlements but also a protected buffer between the development and Tuddenham Lane and Severn Cottage Lane and that access is not provided from these lanes. The mentioned lanes are in the process of being designated as quiet lanes.

Reference should be included in the policy to the need for a footpath that links Humber Doucy Lane and Tuddenham Road.

Legally compliant: Yes

Sound: No

Attachments:

26783

Object

Respondent: Suffolk County Council**Summary:**

In general SCC supports this policy, however it requires an amendment. In the Statement of common ground between IBC and SCC, the authorities agreed to include information on archaeology and a requirement to assess this site. The information has been included in a new paragraph, which is welcome, however there is not requirement for archaeological evaluation within the policy itself. In order for this part of the plan to be sound and consistent with the policy for the East Suffolk part of the site in the Suffolk Coastal Local Plan, a requirement for archaeological assessment should be included in the policy.

Change suggested by respondent:

Include a requirement for archaeological evaluation in the policy.

Legally compliant: Not specified

Sound: Not specified

Attachments:

26714

Support

Respondent: Historic England**Summary:**

We're pleased to see inclusion of revised policy wording and supporting text (paragraph 8.26) for Humber Doucy Lane (Policy ISPA4.1). We particularly welcome the references to the Council's Heritage Impact Assessment (HIA) and that proposals will have to demonstrate how the effects on heritage assets are taken into account and mitigated. We further support the reduction in site capacity from 496 to 449 dwellings.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26710

Object

Respondent: Kesgrave Covenant Ltd

Summary:

Overall, we submit that:

- (a) There has never been any evidence before the Examination that would lead to a conclusion that either the 35 dph density or the 60% residential site coverage were unsound, and therefore there is no need for any Modification in this respect in the first place;
- (b) There has never been any objection from any party to either the 35 dph density or 60% residential site coverage;
- (c) The initial view of IBC to change the yield to 449 was never substantiated or explained, and in any event is superseded by the subsequent view of IBC, as set out in the agreed Modifications, to support the figure of 489 units.

For these reasons, MM17 (and MM18) are unsound for the unjustified amendments to the site yield.

Change suggested by respondent:

The capacity should be reverted to 489 dwellings (which is substantiated by being the sum of 60% site coverage multiplied by 35 dph).

Legally compliant: Yes

Sound: No

Attachments:

MM18 - Page 42, Paragraph 8.24

26711

Object

Respondent: Kesgrave Covenant Ltd

Summary:

Overall, we submit that:

- (a) There has never been any evidence before the Examination that would lead to a conclusion that either the 35 dph density or the 60% residential site coverage were unsound, and therefore there is no need for any Modification in this respect in the first place;
- (b) There has never been any objection from any party to either the 35 dph density or 60% residential site coverage;
- (c) The initial view of IBC to change the yield to 449 was never substantiated or explained, and in any event is superseded by the subsequent view of IBC, as set out in the agreed Modifications, to support the figure of 489 units.

For these reasons, MM17 (and MM18) are themselves unsound for the unjustified amendments to the site yield.

Change suggested by respondent:

The capacity should be reverted to 489 dwellings (which is substantiated by being the sum of 60% site coverage multiplied by 35 dph).

Legally compliant: Yes

Sound: No

Attachments:

MM19 - Page 42, Paragraph 8.26

26715

Support

Respondent: Historic England

Summary:

We're pleased to see inclusion of revised policy wording and supporting text (paragraph 8.26) for Humber Doucy Lane (Policy ISPA4.1). We particularly welcome the references to the Council's Heritage Impact Assessment (HIA) and that proposals will have to demonstrate how the effects on heritage assets are taken into account and mitigated. We further support the reduction in site capacity from 496 to 449 dwellings.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM23 - Page 44, Policy CS1

26736

Object

Respondent:

Summary:

My objection to this wording is similar in nature to my objection of MM3. The wording uses the term "should" when a more appropriate wording to ensure compliance with the policy, should be "must". It seems to me that anything related to tackling climate change is not worded strongly enough to enforce compliance with the policy. With tackling climate change, such a significant government objective must be more enforceable and correct wording of the Local Plan Policy can ensure this.

Change suggested by respondent:

The wording uses the term "should" when a more appropriate wording to ensure compliance with the policy, should be "must". It seems to me that anything related to tackling climate change is not worded strongly enough to enforce compliance with the policy. With tackling climate change, such a significant government objective must be more enforceable and correct wording of the Local Plan Policy can ensure this.

Legally compliant: No

Sound: No

Attachments: None

MM26 - Page 48-49, Policy CS2

26770

Object

Respondent: Associated British Ports

Summary:

The Island Site is situated within the Waterfront area to which this policy applies. As noted at para 5.21, parts of the operational port are also within it. In that context, in our representations we noted the desire of IBC to secure high-density development in the interests of maximising the use of previously developed land, subject to that not compromising heritage assets and the historic character of Ipswich. In our submission we requested the inclusion of additional wording in the final paragraph of Policy CS2

to be amended to "...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets."

We note that this has not been accounted for in the most recent Local Plan revision, and as noted in Policy IP037 above, the Island is still allocated for approximately 421 dwellings. ABP would like to note that this level of density on the Island will be difficult to achieve in viability terms, and instead a density of approximately 22 units per acre (circa. 200 units) will be more achievable to deliver a successful scheme. This density also does not match ABPorts vision for the Island Site which has been agreed with the Partners and the LEP.

Change suggested by respondent:

Given this, ABPorts request the inclusion of additional wording in the final paragraph of Policy CS2 which should be amended as follows "...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.

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM28 - Page 49, Paragraph 8.58

26744

Object

Respondent: Ipswich School**Agent:** Boyer Planning**Summary:**

Ipswich School maintain their view that land at Tuddenham Road, currently identified for "Sport Uses", is not the most appropriate use of land, given the limited housing land within the Borough. Had the Council undertaken a "thorough" review of all development opportunities as part of the SHELAA it would have identified the opportunity for development at Tuddenham Road. MM28 is not considered to be sound as it has not been positively prepared, it is not justified and will not be effective as this strategic matter has been deferred to a future plan review. To make the plan sound, requested that the allocation for "Sport Uses" at Tuddenham Road is amended to allow for residential development on the site which will further assist with the School's current facilities being relocated from Notcutts Field as part of a comprehensive programme of development over the plan period. The allocation of land at Tuddenham Road will also enable the Council to significantly boost housing supply across the Borough in accordance with the NPPF.

Change suggested by respondent:

Allocation for "Sport Uses" at Tuddenham Road be amended to allow for residential development on this site.

Legally Not specified**compliant:****Sound:** No**Attachments:**

MM29 - Page 52, Policy CS3

26771

Object

Respondent: Associated British Ports**Summary:**

The Port of Ipswich is situated both within and immediately adjoining the Waterfront area of IP-One. As well as maintaining its operational activities, ABPorts is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. The importance of the Port continuing to flourish as a major economic driver in the sub-region is recognised in the NALEP Strategic Economic Plan and in this Local Plan. ABPorts would 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. ABPorts requests that recognition is made in Policy CS3 and its accompanying text to the Port and to other important existing employment and other activities within and adjoining the IP-One area which the Council wishes to safeguard and support.

Change suggested by respondent:

Request the 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."

We note and support the inclusion of similar wording to this effect in Policy CS13.

Legally Not specified**compliant:****Sound:** Not specified**Attachments:**

MM31 - Page 55, Policy CS4

26673

Object

Respondent: Marine Management Organisation

Summary:

The Marine Management Organisation has identified a series of policies in the South East Marine Plan as recommendation for consideration against the emerging Ipswich Local Plan Review. These are:- SE-INF-1: Proposals for appropriate marine infrastructure which facilitates land based activities, or land-based infrastructure; - SE-INF-2: safeguarding landing facilities from alternative development; - SE-CO-1: Support for proposals that optimise space and opportunities for existing activities and for co-existence and co-operation with existing activities will be supported; - SE-HER-1: support for conserving and enhancing heritage; - SE-EMP-1: Support for proposals that increase marine activity and appropriate criteria; - SE-CC-1: Support for habitat conservation appropriate flood defence or carbon sequestration proposals; SE-CC-2: Proposals in the south east marine plan area- need to be resilient to climate change and coastal change; - SE-AIR-1: Proposals need to assess all impacts on air quality and greenhouse gasses appropriately; - SE-ML-1: local authorities to follow the waste hierarchy and aspire to reduce and prevent marine litter; - SE-ML-2: Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported; - SE-WQ-1: support for proposals that restore and enhance water quality; - SE-ACC-1 - Support for enhancing and inclusive public access to and within the marine area; tourism and recreation; - SE-TR-1: - promotion and facilitation of sustainable tourism is supported with appropriate criteria to be followed; - SE-MPA-1: - proposals that support the MMO objectives and ecological adherence are supported; - SE-MPA-2:- proposals that support the marine area adapt and become resilient to climate change are supported; - SE-MPA-3 - Need to ensure suitable boundaries where there is marine deterioration; - SE-MPA-4: Proposals with mineral impact must follow the mitigation hierarchy; - SE-BIO-1: - Supports proposals that enhance priority species; - SE-BIO-2 proposals that enrich native species, habitat adaptation or connectivity are supported; - SE-BIO-3:- support proposals that conserve, enhance or restore coastal habitats; and - SE-DIST-1: where proposals involve highly mobile species they need to adhere to the mitigation hierarchy.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Attachments:

MM32 - Page 57, Paragraph 8.78

26672

Object

Respondent: Marine Management Organisation

Summary:

You refer to the South East marine plan "The South East Marine Plan which covers an area from Landguard Point in Felixstowe to Samphire Hoe near Dover was published for public consultation in January 2020 and is therefore also a material consideration". The South East Marine Plan was adopted this year and is no longer material for consideration but has the full weight of an adopted plan.

The East Inshore and East Offshore Marine Plans were adopted in 2014, and the South Inshore and Offshore Marine Plan was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included.

Change suggested by respondent:

Change "also a material consideration" to "afforded the full weight of an adopted plan."

Legally Not specified
compliant:

Sound: Not specified

Attachments:

MM33 - Page 60, Policy CS5

26782

Object

Respondent: Suffolk County Council

Summary:

The aim of 15% modal shift in this policy is supported. It is noted that thresholds for transport statements and transport assessments has been updated to align with new use class order. It also appears that the thresholds match the guidance in SCCs travel plan guidance in order to align TAs, TSs and TP's which is supported. The TP Guidance has not yet been updated to reflect the new Use Class Order, however SCC would appreciate discussion with IBC before the policy is finalised to ensure that both organisations are aligned in the approach to using the thresholds.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Attachments:

MM36 - Page 65-66, Policy CS7**26745****Support****Respondent:** Ipswich School**Agent:** Boyer Planning**Summary:**

Ipswich School supports the revisions to the housing requirement as outlined in Policy CS7. Ensuring that the Council plan for the appropriate number of dwellings is paramount and following the Government's standard method to quantify local housing need is supported. Ipswich School welcome the increase of units to be planned for over the plan period.

MM36 is considered to be legally compliant and sound.

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Attachments:**MM41 - Page 69, Policy CS8****26772****Object****Respondent:** Associated British Ports**Summary:**

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 notes the desire of IBC to secure high density development on central sites (para 8.121) which will also assist viability. However, high density may not be appropriate in all instances.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM43 - Page 74-76, Policy CS10

26746

Support

Respondent: Ipswich School**Agent:** Boyer Planning**Summary:**

Ipswich School support the modification to the policy which requires development proposals to “have regard to the principles, objectives and vision of the adopted SPD.” Amending the policy wording provides greater flexibility for landowners as they bring forward land within the IGS over the plan period. As a member of the IGS Delivery Board and a significant landowner within this strategic site, the modification is welcomed. MM43 is considered to be legally compliant and sound.

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Attachments:

26697

Object

Respondent: Mersea Homes Limited**Summary:**

Policy CS10 Affordable Housing provisions - In relation to the affordable housing requirement of 31% in Policy CS10, the Council's further written statement as per K22 seeks to explain why it considers it can rely on the Aspinal Verdi Whole Plan Viability Assessment as evidence to support that provision. We explain why, with cross reference to our original submissions, the Aspinal Verdi appraisal is flawed, and therefore cannot be relied on, and in the absence of any other evidential base to support 31%, the Plan is unsound. Policy CS10 seeks 31% affordable housing, but the premise for that figure is a flawed viability assessment. This means that there is no credible evidence base to support that figure, regardless of whether it is mathematically possible or not.

There is however a credible evidence base to support an affordable housing target of 5%, because there are two site specific appraisals that show that outcome.

Change suggested by respondent:

As we have stated previously, there is no harm in having an aspirational policy so long as it is credible. Therefore, a policy that seeks a minimum of 5% affordable housing but a target higher than that of, say, circa 20% (as per our Hearing Statement), is credible, based on evidence, and yet still aspirational.

Legally compliant: Yes

Sound: No

Attachments:

26698

Object

Respondent: Mersea Homes Limited**Summary:**

Policy CS10 wording in respect of viability review provisions - We explain, again in response to K22, why in the absence of any Modification, the viability review mechanism text is unsound. Although IBC correctly point out that the wording used has not prevented the grant of the permissions for Fonnereau and Henley Gate, each with viability review mechanisms, we would say that has been achieved in spite of the wording of the text, not because of it, and the text remains unclear.

Change suggested by respondent:

The first relevant sentence, as currently drafted, states: "The re-testing of the viability will occur pre implementation of individual applications within each neighbourhood." At the very least, the wording in this sentence should be clarified to make clear that the word

"application" means the second and subsequent Reserved Matters applications (as there shouldn't be a review prior to the implementation of the first Reserved Matters), and the word "neighbourhood" should be changed to "phase" if IBC want to continue referring to individual application sites as phases.

The second relevant sentence states: "Each phase of development will be subject to a cap of 35% affordable housing." In that context, either the word "phase" should be clarified in this instance as referring to a phase of development within a multi-phased application site, or, if the Council do not accept that clarification, the sentence should be removed.

Legally Yes
compliant:

Sound: No

Attachments:

26699

Object

Respondent: Mersea Homes Limited**Summary:**

We understand that the Council has sought to update the Plan in relation to the new Use Classes order, but the revisions made are not in our view Justified as they unreasonably preclude certain uses that the submitted version of the Plan would have allowed. In the Submitted version of the Plan, the uses permissible within the Local Centres included a specified amount of retail use (convenience and comparison), and also any use within the old Use Classes A2-A5, and non-retail uses falling within Class A1. The new wording only allows for 5 specific uses in addition to retail – restaurants, cafes, offices, public houses and hot food takeaways. The purpose of the new Class E Use Class is to promote the vitality of Local Centres by allowing uses to freely change between different types, and therefore there would need to be a very clear rationale for excluding uses that would otherwise fall within the same use class. There is nothing in the Modifications that explains why a hairdressers (by way of an example) would be inappropriate within a Local Centre.

Change suggested by respondent:

A more appropriate update of the text to reflect the new Uses Classes would have been to ensure that the amendments allow for the same types of uses as the original text allowed i.e uses within Classes E(b) (for food and drink), E(c) (for financial and professional services), E(g)(i) (for offices) and then wine bars, public houses, and hot food takeaways as the additional sui generis uses that previously would have been permissible under Classes A4 and A5.

Legally Yes
compliant:

Sound: No

Attachments:

26700

Object

Respondent: Mersea Homes Limited**Summary:**

Policy CS10 the wording of the policy in relation to site specific matters and the role of the SPD - Elements of the detailed wording of the policy in relation to site specific matters and the role of the SPD, which relate to Effectiveness, are unsound. Our concern is the reference to the SPD identifying detailed locations for uses and infrastructure, which we do not consider is consistent with the stated purpose of the SPD as acting as guidance for development proposals (and arguably is also contrary to the relevant Local Plan Regulations in respect of the ability or otherwise for SPD to allocate land for development).

Change suggested by respondent:

The text that refers to the SPD making site allocations can easily be removed if this section of the Policy is simplified as follows:

“An Ipswich Garden Suburb supplementary planning document (SPD) has been adopted which provides guidance on how the allocations in the development plan will be delivered both in spatial terms and in terms of sequencing, along with more general supplementary planning and design advice”

[This text is essentially copied from paragraph 1.11 of the SPD].

The text of Policy CS10 goes on to state that development proposals will be required to demonstrate that they are in accordance with the SPD. This sentence appears to misstate the purpose of the SPD as guidance in the determination of planning applications, and essentially prescribes the SPD the weight of statutory policy. The SPD clearly has weight as a material consideration, but the wording of Policy CS10 should, we consider, properly reflect that status.

For example, the text might more appropriately state:

“Development proposals will be required to demonstrate how they have had regard to the principles and objectives of the adopted SPD.”

Legally Yes
compliant:

Sound: No

Attachments:

26701

Object

Respondent: Mersea Homes Limited**Summary:**

The Affordable Housing provisions, which relate to soundness issues in respect of the justification and the effectiveness of the Policy. The overall quantum to be achieved requires revaluation in the light of the decisions already made. It is unclear as to why the Whole Plan Viability Appraisal has been progressed on the basis of assessing the Ipswich Garden Suburb as if there were no existing permissions and as if the whole of the 3500 units were unconsented, but the result is that the Appraisal has produced an outcome that is both unreliable, unevidenced, and effectively impossible to achieve.

Change suggested by respondent:

N/A

Legally Yes
compliant:

Sound: No

Attachments:

26702

Object

Respondent: Mersea Homes Limited

Summary:

The wording of the Policy in respect of viability review provisions is unsound as it is impractical and imprecise. The wording states that viability will be re-tested prior to implementation of applications within each neighbourhood, but is not clear as to whether it is referring to outline applications or reserved matters applications. If the former, then the re-testing prior to implementation would serve no purpose, because in all likelihood the Outline permission will only have been granted relatively recently, and so the re-test would be likely to produce similar results. If the intention were to re-test before implementation of each Reserved Matters implementation, then re-testing might either be happening on an unrealistically frequent basis if a phase is made up of many Reserved Matters, or otherwise might not happen at all if a developer came forward with a single large Reserved Matters application for an entire site.

Change suggested by respondent:

Accordingly, the text of the Policy needs to exclude reference to re-testing on application, and instead say that triggers for re-testing of viability will be agreed as part of the s106 obligations at the planning permission stage.

Legally Yes

compliant:

Sound: No

Attachments:

MM49 - Page 80-81, Policy CS11

26756

Support

Respondent: East Suffolk Council

Summary:

The proposed amendments to Policy CS11 'Gypsy and Traveller Accommodation' in relation to the provision of short stay stopping sites are consistent with the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

Change suggested by respondent:

N/A

Legally Not specified

compliant:

Sound: Not specified

Attachments:

26743

Object

Respondent: Bramford Parish Council**Summary:**

Discussed at Bramford Parish Council meeting of the 20th September that because no information given to Bramford Parish Council, that the requirements stated makes the consultation void at this juncture.

The residents have approached Bramford Parish Council, telling us of their concerns, that frequent travellers onto the site with no formal checks and follow up would create policing impossible and the opportunity of crime would be increased within the area, which would include Bramford Village.

There is no secure perimeter fencing around the border of the site which has led to criminal activities outside the perimeter, both into Bramford Village and onto the A14, which has also caused damage and may cause human and animal injury.

Request the courtesy of representative from IBC to contact Bramford Parish Council and the residents of Bramford Village, to fully explain, through a presentation the plans and reasoning for this proposed extension.

Change suggested by respondent:

N/A

Legally Not specified
compliant:

Sound: Not specified

Attachments:

26781

Object

Respondent: Suffolk County Council**Summary:**

Expanding an already established site provides a simple solution to meet need to find appropriate land for this type of housing. It also could give an opportunity to integrating new families or families who would struggle to find a plot to live on by themselves.

However this is not in line with the previous experience of SCC. In our experience, the more successful Traveller communities are usually smaller with the same families on them or close friends. It is our understanding that this is their preferred way of life as many do not necessarily like living amongst other gypsy or travellers in large groups. In larger mixed groups there are usually the more dominant families who try to exert control over a site, which means distrust and conflict amongst the rest of the families or even fear.

SCCs view is that careful consideration should be given and mitigations put in place if the expansion is to include families who are not closely linked to the existing residents.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Attachments:

26696

Support

Respondent: Suffolk County Council**Summary:**

SCC is no longer the owner of the WM site, which was sold to a management company owned by the residents. It does however retain a roadside strip of land across the frontage (with which to protect future use).

It is our belief that the current rights of way over the roadside strip, as currently enjoyed by the residents, are adequate to support additional pitches (i.e. SCC can prevent change of use but not intensification).

Therefore no comments from SCC as landowner. Other directorates of SCC may wish to comment from a planning or community perspective though.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments: None

26704

Object

Respondent: Suffolk Constabulary**Summary:**

It is understood that Ipswich Borough Council has a duty under national government policy to identify suitable sites for Gypsy and Traveller Accommodation. However, it is noted that the Gypsy, Traveller, Travelling Show people and Boat Dwellers Accommodation Needs Assessment identified 'strong evidence' of the preference in the Gypsy and Traveller Community locally for smaller pitches for family groups. Previous correspondence from Suffolk Constabulary has expressed the view that new sites should not exceed 20 pitches. Whilst the revised plan only identifies the need for an additional 13 pitches, adding those to the current 42 pitches at West Meadows would take the total pitch number to over 50.

Change suggested by respondent:

Therefore, taking both matters into account, it is recommended that the policy is re-worded to reflect the priority of identifying, and evidencing that research, smaller sites, with expansion at West Meadows being an alternative option only if more suitable smaller sites cannot be found.

Legally compliant: Not specified

Sound: Not specified

Attachments:

26731

Object

Respondent: National Highways (Formerly Highways England)**Summary:**

The proposed expansion of the travellers site at Water Meadow, should be acceptable, however a transport assessment will be required by National Highways and this may identify an impact that may require mitigation. (Note to Inspectors, the site referred to should be West Meadows rather than Water Meadow)

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM55 - Page 83, Policy CS12

26773

Support

Respondent: Associated British Ports**Summary:**

ABPorts 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.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM57 - Page 86, Policy CS13

26774

Support

Respondent: Associated British Ports**Summary:**

ABPorts welcomes and supports the inclusion in Policy CS13 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 role of the port to Ipswich" in response to ABPorts' specific request for such reference in the previous Core Strategy and Policies Development Plan Document Review Preferred Options.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM66 - Page 97-98, Policy CS17

26757

Object

Respondent: East Suffolk Council**Summary:**

ESC is supportive of IBC's positive commitment to the delivery and funding of modal shift mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. The Council notes the proposed modifications to Policy CS17 under MM66, to Policy DM21 under MM99, and to Policy DM22, under MM102, that further the Ipswich Local Plan's positive commitment to meeting the objectives for modal shift as per the ISPA SoCG (A21). However, under the proposed modifications to Policy CS17 it is not clear why only off-site works or financial contributions are sought towards sustainable transport improvements, as there may be opportunities for on-site measures that would support modal shift.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26747

Support

Respondent: Ipswich School**Agent:** Boyer Planning**Summary:**

Ipswich School support the modification to the policy in respect of reference to modal shift objectives within Policy CS17. Land at Notcutts Field, which is part of the Ipswich Garden Suburb, is well placed to contribute towards modal shift and the variety of sustainable transport improvements required over the plan period. MM66 is considered to be legally compliant and sound.

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Attachments:

26706

Support

Respondent: East Suffolk and North Essex NHS Foundation Trust (ESNEFT)

Summary:

Of note, it is welcomed that Policy CS17 (Delivering Infrastructure) now makes reference to acute hospital facilities and ESNEFT is content with these amendments which allow for developer contributions for essential healthcare services. Furthermore, within Policy CS19 (Provision of Health Services) it is acknowledged that 'further inpatient and outpatient accommodation and facilities' are identified as acceptable related uses.

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Attachments:

MM68 - Page 101, Policy CS19

26707

Object

Respondent: East Suffolk and North Essex NHS Foundation Trust (ESNEFT)

Summary:

Policy CS19's wording, along with its supporting text, continues to refer to 'safeguarding' the site for healthcare purposes. This runs contrary to ESNEFT's planning requirements and is also unnecessary and unreasonable. This policy basis is essentially overly restrictive and would not provide sufficient flexibility and discretion to ESNEFT to enable it to realise its development requirements and does not reflect the most appropriate strategy for the site. Consequently, whilst Policy CS19 remains as currently proposed to be amended by the Local Planning Authority, the draft Local Plan remains 'unsound' when considered against the tests set out in paragraph 35 of the NPPF.

Change suggested by respondent:

It is requested that Policy CS19 reads as follows:

The Council supports the development of healthcare related facilities at the Heath Road Hospital Campus as identified on the policies map. Related uses may include:

- ☒ Further inpatient and outpatient accommodation and facilities;
- ☒ Staff accommodation;
- ☒ Residential care home;
- ☒ Intermediate facilities;
- ☒ Education and teaching centre;
- ☒ Therapies centre; and
- ☒ Other ancillary uses.

Proposals for new and improved healthcare, ancillary facilities and other compatible development at Heath Road Hospital Campus will be supported providing they form part of the Hospital Trust's Estate Strategy for the provision of healthcare facilities, consistent with an overall site wide masterplan prepared by the Trust and associated Transport Strategy including suitable travel plan measures and parking provision.

Legally compliant: Yes

Sound: No

Attachments:

MM69 - Page 101, Paragraph 8.229**26708****Object****Respondent:** East Suffolk and North Essex NHS Foundation Trust (ESNEFT)**Summary:**

Following our representations to the Final Draft consultation, ESNEFT are pleased the majority of our suggested wording has been incorporated within paragraph 8.229, as shown within Main Modification 69. However a sentence previously requested to be removed due to it covering healthcare matters beyond the scope of the Local Planning Authority's remit remains, while 'other compatible uses' within the second sentence has been replaced with 'ancillary uses'. This does not provide the Trust with sufficient flexibility or allow for the introduction of non-health care uses where appropriate and acceptable in planning terms, which could result in future planning policy tensions within any future planning application.

Change suggested by respondent:

It is requested that paragraph 8.229 is amended to read as follows:

The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. The policy allows for a range of healthcare and other compatible uses, including staff support services to assist with recruitment and retention.

Additional ancillary uses may also include shared facilities to deliver a mutual benefit to other public sector organisations aligned with the one public estate agenda.

Legally Yes
compliant:

Sound: No

Attachments:

MM70 - Page 101, Paragraph 8.230**26709****Object****Respondent:** East Suffolk and North Essex NHS Foundation Trust (ESNEFT)**Summary:**

Within MM70, the replacement of 'existing' with 'proposed' in relation to parking issues hasn't been incorporated. ESNEFT considers it unreasonable to insist proposed development should tackle existing parking issues, particularly when they may not be associated with the Hospital. Traffic, travel and parking impacts of hospital development should be considered on its individual merits, consistent with NPPF paragraphs 55-57.

In addition, the replacement of 'possible' with 'practicable' hasn't been incorporated as it could be misinterpreted as allowing for economic or other reasons for not pursuing sustainable travel modes. ESNEFT dispute this and consider 'practicable' more appropriate in the context of the travel opportunities and constraints of a working acute hospital.

Change suggested by respondent:

It is requested that paragraph 8.230 be amended to the following:

It is also essential that the travel implications of hospital related developments are fully considered and measures are put in place to encourage the use of sustainable modes where practicable by staff, out-patients, and visitors. In particular, measures should tackle parking issues in surrounding residential areas associated with proposed Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving to be effective.

Legally Yes
compliant:

Sound: No

Attachments:

MM77 - Page 111, Paragraph 9.3.1

26719

Object

Respondent: Northern Fringe Protection Group

Summary:

The proposed modification MM77 is insufficient and needs to include a compliance date to be effective and consistent with national policy. We advocate that this is set at end 2023. Without a target date Policy DM3 cannot possibly be effective. We note that paragraph a) repeated below references that Development proposals should not “delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits”. Consequently a date for compliance must be included in the Plan, otherwise how will compliance with this requirement be assessed?

Change suggested by respondent:

MM77 therefore should be amended to read

“... .. to contribute towards achieving compliance with air quality limit values for pollutants by end 2023.”

Legally No
compliant:

Sound: No

Attachments:

26765

Object

Respondent: Save Our Country Spaces

Summary:

The proposed modification MM77 is insufficient and needs to include a compliance date to be effective and consistent with national policy. We advocate that this is set at end 2023. Without a target date Policy DM3 cannot possibly be effective. We note that paragraph a) repeated below references that Development proposals should not “delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits”. Consequently a date for compliance must be included in the Plan, otherwise how will compliance with this requirement be assessed?

Additional information regarding public health and air quality included which should have been attached to Core Document Library document K13.

Change suggested by respondent:

MM77 therefore should be amended to read “... .. to contribute towards achieving compliance with air quality limit values for pollutants by end 2023.”

Legally No
compliant:

Sound: No

Attachments:

MM78 - Page 113, Policy DM4**26739****Support****Respondent:** Environment Agency**Summary:**

Thank you for the opportunity to comment on the Main Modification Document related to the Ipswich Local Plan. We have reviewed the proposed modifications to the plan and are satisfied with the changes that relate to our remit. Since we previously commented on the Local Plan climate change allowances have been updated, the new national guidance link can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:**MM84 - Page 123, Policy DM8****26760****Support****Respondent:** East Suffolk Council**Summary:**

The proposed changes set out under MM84 to Policy DM8 'The Natural Environment', through the addition of the three new paragraphs related to European sites and the Recreational Disturbance Avoidance and Mitigation Strategy, and the proposed changes to paragraph 9.8.2 under MM85 reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM85 - Page 124, Paragraph 9.8.2**26761****Support****Respondent:** East Suffolk Council**Summary:**

The proposed changes set out under MM84 to Policy DM8 'The Natural Environment', through the addition of the three new paragraphs related to European sites and the Recreational Disturbance Avoidance and Mitigation Strategy, and the proposed changes to paragraph 9.8.2 under MM85 reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:**MM90 - Page 133, Policy DM12****26776****Object****Respondent:** Associated British Ports**Summary:**

ABPorts is 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.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM93 - Page 137-138, Policy DM13

26777

Object

Respondent: Associated British Ports

Summary:

Objects to reference in the section titled 'Conservation Areas' to demolition of buildings and to the consideration by the Council 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" (last two bullet points). ABPorts benefits from 'permitted development' rights over land it owns which is classed as 'operational land' Part 17 is applicable to development by Statutory Undertakers. Reliance on its permitted development rights on its operational land within the Port estate (limited by environmental regulations and other considerations) is critical to the ability of ABPorts to fulfil its statutory duties. Therefore strongly resist any steps taken to seek to withdraw the permitted development rights it benefits from.

Change suggested by respondent:

If reference to withdrawal of permitted development rights in this Policy is not meant to encompass the permitted development rights enjoyed by ABPorts, we would request specific clarification of this point.

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM95 - Page 144, New Paragraph

26712

Support

Respondent: Historic England

Summary:

We welcome the inclusion of the changes agreed through our Statement of Common Ground, October 2020 (Document I30.1). In particular the additional supporting text for Policy DM14 (Archaeology) highlighting the presence of Scheduled Monuments within Opportunity Areas A and B.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM96 - Page 145, Policy DM15**26713****Support****Respondent:** Historic England**Summary:**

We welcome the inclusion of the changes agreed through our Statement of Common Ground, October 2020 (Document I30.1), including the addition of criterion 'I' in Policy DM15 (Tall Buildings) which now includes reference to scheduled monuments, and the importance of setting in considering impacts on the historic environment.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:**MM99 - Page 156, Policy DM21****26720****Object****Respondent:** Northern Fringe Protection Group**Summary:**

To be consistent with Policy DM3, MM99 also needs to make it clear that there should not be any "negative impact" on, and around, existing AQMAs from new development or the exceedances of legally binding limit values anywhere in Ipswich. We also note that there is no definition of "significant" and suggest that this needs to be deleted. To be effective and consistent with national policy MM99 needs to be revised (see suggested change).

Change suggested by respondent:

Suggest the following, which is more consistent with Policy DM3.

"shall: b. not result in:

1. any detrimental impact on air quality in and around the existing AQMAs,
2. the creation of any new AQMAs,
3. a detrimental impact on air quality elsewhere in Ipswich that is likely to result in a negative impact on health."

Legally compliant: No

Sound: No

Attachments:

26766

Object

Respondent: Save Our Country Spaces**Summary:**

To be consistent with Policy DM3, MM99 also needs to make it clear that there should not be any “negative impact” on, and around, existing AQMAs from new development or the exceedances of legally binding limit values anywhere in Ipswich. We also note that there is no definition of “significant” and suggest that this needs to be deleted. To be effective and consistent with national policy MM99 needs to be revised (see suggested change).

Additional information regarding public health and air quality included which should have been attached to Core Document Library document K13.

Change suggested by respondent:

Suggest the following, which is more consistent with Policy DM3. “shall: b. not result in: 1. any detrimental impact on air quality in and around the existing AQMAs, 2. the creation of any new AQMAs, 3. a detrimental impact on air quality elsewhere in Ipswich that is likely to result in a negative impact on health.”

Legally compliant: No

Sound: No

Attachments:

26758

Object

Respondent: East Suffolk Council**Summary:**

ESC is supportive of IBC's positive commitment to the delivery and funding of modal shift mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. The Council notes the proposed modifications to Policy CS17 under MM66, to Policy DM21 under MM99, and to Policy DM22, under MM102, that further the Ipswich Local Plan's positive commitment to meeting the objectives for modal shift as per the ISPA SoCG (A21). However, under the proposed modifications to Policy CS17 it is not clear why only off-site works or financial contributions are sought towards sustainable transport improvements, as there may be opportunities for on-site measures that would support modal shift.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM102 - Page 159, Policy DM22

26778

Support

Respondent: Associated British Ports

Summary:

ABPorts 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.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

26759

Object

Respondent: East Suffolk Council

Summary:

ESC is supportive of IBC's positive commitment to the delivery and funding of modal shift mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. The Council notes the proposed modifications to Policy CS17 under MM66, to Policy DM21 under MM99, and to Policy DM22, under MM102, that further the Ipswich Local Plan's positive commitment to meeting the objectives for modal shift as per the ISPA SoCG (A21). However, under the proposed modifications to Policy CS17 it is not clear why only off-site works or financial contributions are sought towards sustainable transport improvements, as there may be opportunities for on-site measures that would support modal shift.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM131 - Page 184, Policy DM33

26779

Support

Respondent: Associated British Ports

Summary:

ABPorts 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. We welcome the recognition at para 9.33.6 of the need for ABPort'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.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM140 - Page 207, Objective 1

26762

Object

Respondent: East Suffolk Council

Summary:

The proposed Main Modification to the targets related to strategic working set out that joint master planning with ESC of the land north of Humber Doucy Lane would be completed by 2026/27. Whilst Policy SCLP12.24 of the Suffolk Coastal Local Plan also envisages a master planned approach for the whole site, as the timescale for delivery of the site is dependent upon education infrastructure provision it may be more appropriate to refer to undertaking master planning at an appropriate point in time to facilitate development coming forward. Further, the master planning could be developed, and the approach should be flexible at this stage.

Change suggested by respondent:

Refer to undertaking master planning at an appropriate point in time to facilitate development coming forward.

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM143 - Page 208, Objective 5

26721

Object

Respondent: Northern Fringe Protection Group

Summary:

The reference to "the corporate Air Quality Action Plan Review (Council Target)" should be removed as a) this Review is not in the public domain and b) has not been agreed so it is therefore not yet a Council target. We strongly object to the proposed 2036 date as this will result in further un-necessary deaths and cases of respiratory illness in Ipswich. It is clearly not effective, justified, or consistent with national policy to continue to allow illegal air quality levels in Ipswich for another 25 years. It clearly illustrates that IBC is not taking its air quality duties seriously.

We note that since its first Air Quality Action Plan in 2008, IBC has failed to improve air quality in Ipswich and the number of AQMAs has been increased from the initial three AQMAs.

Also note that this target could be achieved by reducing just one of existing AQMAs by just 1m2. The Executive Summary of IBC's current Air Quality Action 2019-2024 states that "Ipswich Borough Council is committed to reducing the exposure of people in Ipswich to poor air quality in order to improve health." This target is therefore inconsistent with IBC's own AQAP as it illustrates no real commitment to reducing the exposure of people in Ipswich to poor air quality. It is clearly worthless and needs to be replaced with a target that will ensure compliance with UK air quality legislation and NPPF paragraph 186.

Change suggested by respondent:

MM143 should be revised to read

OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE

Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels and to contribute towards achieving compliance with air quality limit values for pollutants by 2024."

INDICATOR(S)

Local authority CO2 emissions. Local authority air pollution data.

Number and extent of designated AQMAs.

NOx and particulate concentrations measured through AQMA data and DEFRA returns.

TARGETS

To eradicate all AQMAs and comply with UK limit values for air pollutants by 2024.

Plan 7 and paragraphs 8.241 and 9.3.2 need to be updated in light of only four declared AQMAs being agreed at the IBC Executive Meeting on 10 August 2021.

**Legally No
compliant:**

Sound: No

Attachments:

26767

Object

Respondent: Save Our Country Spaces**Summary:**

The reference to “the corporate Air Quality Action Plan Review (Council Target)” should be removed as a) this Review is not in the public domain and b) has not been agreed so it is therefore not yet a Council target. We strongly object to the proposed 2036 date as this will result in further un-necessary deaths and cases of respiratory illness in Ipswich. It is clearly not effective, justified, or consistent with national policy to continue to allow illegal air quality levels in Ipswich for another 25 years. It clearly illustrates that IBC is not taking its air quality duties seriously.

We note that since its first Air Quality Action Plan in 2008, IBC has failed to improve air quality in Ipswich and the number of AQMAs has been increased from the initial three AQMAs.

Also note that this target could be achieved by reducing just one of existing AQMAs by just 1m2. The Executive Summary of IBC’s current Air Quality Action 2019-2024 states that “Ipswich Borough Council is committed to reducing the exposure of people in Ipswich to poor air quality in order to improve health.” This target is therefore inconsistent with IBC’s own AQAP as it illustrates no real commitment to reducing the exposure of people in Ipswich to poor air quality. It is clearly worthless and needs to be replaced with a target that will ensure compliance with UK air quality legislation and NPPF paragraph 186.

Additional information regarding public health and air quality included which should have been attached to Core Document Library document K13.

Change suggested by respondent:

MM143 should be revised to read OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels and to contribute towards achieving compliance with air quality limit values for pollutants by 2024.”. INDICATOR(S) Local authority CO2 emissions. Local authority air pollution data. Number and extent of designated AQMAs. NOx and particulate concentrations measured through AQMA data and DEFRA returns. TARGETS To eradicate all AQMAs and comply with UK limit values for air pollutants by 2024. Plan 7 and paragraphs 8.241 and 9.3.2 need to be updated in light of only four declared AQMAs being agreed at the IBC Executive Meeting on 10 August 2021.

Legally compliant: No

Sound: No

Attachments:

MM145 - Page 209, Objective 7

26670

Support

Respondent: Theatres Trust**Summary:**

The Trust is supportive of this modification to improve the plan's effectiveness and the policy's justification, setting ambition to grow visitors to the Corn Exchange and Regent by 10%.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments: None

MM149 - Page 211, Objective 11

26705

Object

Respondent: Suffolk Constabulary

Summary:

One of the targets to evidence compliance with this objective is that the impact of designing out crime on anti-social behaviour statistics to reduce by a minimum of 25% by 2036 (from 2020 baseline).

Suffolk Constabulary will continue to work closely with IBC to identify opportunities to design out crime at the planning stage. However, in order for this target to be realistic and achievable, clear definition of the parameters should be identified. For example: which statistics (including definitions of ASB) will be used to determine this target; how will the impact of the lockdowns during 2020 be reflected; how will population growth be factored into consideration and how will it be determined if 'designing out crime' has led to a decrease in anti-social behaviour?

Change suggested by respondent:

A more measurable and defined target may be to ensure that all planning applications for Major Projects are submitted to Suffolk Constabulary for comment and acting on concerns raised. This would then ensure that IBC are tackling all crime types in partnership, not simply those related to ASB, this would create a safer, more cohesive town.

Legally compliant: Not specified

Sound: Not specified

Attachments:

**Site Allocations and Policies (Incorporating IP-One Area
Action Plan) Development Plan Document (DPD) Main
Modifications**

Record count: 44

MM162 - Page 3, Paragraph 1.2

26738

Support

Respondent: Ministry of Defence

Summary:

There are two areas of interest for the MOD, these being RAF Wattisham and the East 2 WAM network (a new technical asset consisting of a network of linked sites, whereby statutory safeguarding zones have been designed to ensure development which might impact on the operation and capability of both the linked sites, and the links between them, will result in consultation).

The MOD have no concerns to the Site Allocations and Policies Development Plan Document Main Modifications.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26740

Support

Respondent: Environment Agency

Summary:

Thank you for the opportunity to comment on the Main Modification Document related to the Ipswich Local Plan. We have reviewed the proposed modifications to the plan and are satisfied with the changes that relate to our remit. Since we previously commented on the Local Plan climate change allowances have been updated, the new national guidance link can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26816

Support

Respondent: Natural England**Summary:**

In our previous consultation response (dated 24th September 2021, our ref: 361910), we advised that: 'policies for larger residential developments (50 units +, or equivalent, as a guide) and any smaller residential developments that are in very close proximity (200m or less) to designated sites, should be amended to reflect that further mitigation will be required beyond a contribution to the Suffolk Coast [Recreational Disturbance Avoidance and Mitigation Strategy] RAMS to ensure no adverse effect on the integrity of any European site as a result of recreational disturbance.'

The council has since provided further information and clarification on how this advice had already been captured by their core strategy policy DM8 and their active Suffolk Coast RAMS SPD. The council highlighted that the residential planning policies within the 'Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD' outline site constraints only and compliance with policy DM8 and RAMS SPD are sufficient to provide the necessary safeguards with respect to this issue.

On this basis, we agree with the council's reasoning and are now satisfied that the Plan will not result in adverse effects on the integrity of any of the European sites in question, providing that all mitigation measures are appropriately secured in any related planning permissions, consistent with the Plan policy. As such this advice supersedes our previous consultation letter (dated 24th September 2021, our ref: 361910).

We welcome and commend the various new policy statements which seek to ensure biodiversity net gain.

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Attachments:

MM168 - Page 17, Policy SP2

26728

Object

Respondent:**Summary:**

So the word unviable for the Council to progress means the site won't be developed? Is this what I'm reading.

It was just the note on the website saying the council thinks the knocking down of the old co-op along Prince of Wales isn't viable or cost effective. It was just to clarify this.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26671

Object

Respondent:**Summary:**

I followed the Planning Decisions on the Prince of Wales Drive – Co-op site and proposed future build. I felt sorry for the residents who had moved into the housing properties alongside the Co-op and also the residents of Chatsworth Crescent properties that would back onto the proposed building site. There was no public consultation concerning the proposed new buildings and the outline aim went against the original proposals for Stoke Park Estate which asked for open views of the surrounding countryside. A lady at the Council meeting stated that Stoke Park had sufficient shops. We had a delightful range of shops (about 20 in total) a garage and a public house which were all demolished and replaced by a third rate superstore which was in the middle of the estate. The Co-op bought the land for a low price. The Council decision to allow the building of ASDA meant the Co-op could not compete. The two shops adjacent to the Co-op were given notice even though they were both flourishing and were put up for sale. There were offers made to the Co-op by other businesses but these were turned down. The Co-op applied for change of use of land and stand to make a lot of money because of that. When ASDA was built a big area alongside the supermarket was left and has become derelict and would have made a good site for the development now scheduled for the empty Co-op property. This area needs more shops. Maidenhall estate only has two shops for the entire estate. The proposals are situated at a bottle knock on Prince of Wales Drive opposite a very busy Primary School and an Old People's Home. Removing the parking facilities which are used by all will just add to the frustrations already felt by parents and neighbours alike. I wish to state that I do not want to be involved in any way with the Ipswich Local Plan Review. I was brought up in Ipswich when it was a pleasant market town and not the awful dump it has become.

Change suggested by respondent:

Representation makes no reference plan change, legal compliance, duty to co-operate or soundness.

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM175 - Page 30, Policy SP3

26732

Object

Respondent:**Summary:**

The plan for IP131 - Milton Street is not consistent with the current HM Land Registry document, title number SK205843. The land registry shows the parking space behind 49 and 51 Milton Street as part of the title for 51 Milton Street, but the proposed plan omits this fact, and includes the parking space as part of the development site, which it is not. Also, I have not received the paper copy of the proposed development, I am working from the notice attached to the lamppost only.

Change suggested by respondent:

Plan should not include the parking space behind 51 and 49 Milton Street.
Plan should be changed to agree with the current HM Land Registry in this respect.
Notification of affected residents was not complete.
I would also like to see evidence that drainage impact has also been considered by the plan.

Legally No
compliant:

Sound: No

Attachments:

26748

Object

Respondent:**Summary:**

Owner of a freehold property part of which appears to be included in the allocated area (IP131).

The concreted area beyond the garden is my parking area with vehicular access from Milton Street. Plans to apply to construct a double garage here. Surprised to find it included in a plan for possible alternative development.

The commercial area begins beyond the second (security) fence, not the wooden garden fence at the end of my property (as shown on the plan). No objection to the re-development of the commercial land for domestic dwellings.

Object to inclusion of part of my property for possible re- development, especially as it would deprive me of a valuable parking facility. I expect that if informed the owner of the neighbouring property will also object.

Assume that an oversight has occurred in the drawing up of the plan. Please ensure it is corrected to exclude the domestic property described.

Have not had time to consult widely upon this matter.

Change suggested by respondent:

Amend drawing to remove residential freehold property.

Legally Not specified
compliant:

Sound: Not specified

Attachments: None

MM196 - Page N/A, New Policy

26802

Object

Respondent: Suffolk County Council

Summary:

SCC supports this policy, but suggests there could be some improvements. Reference to adopted cycling and walking infrastructure strategies of both the councils could be mentioned in the policy, not just the explanatory text, and projects contributing to the Transport Mitigation Strategy for ISPA. The second paragraph could also make reference to improving the quality of PRoW themselves, as well as linkages to them (see suggested change).

Change suggested by respondent:

Amend the second paragraph of this policy to read as follows: "The Council will seek opportunities to deliver specific sustainable travel infrastructure improvements outside the IP-One Area through safeguarding sites/routes where necessary, new developments and/or seeking funding opportunities. In particular opportunities will be sought to deliver routes that implement the Ipswich Cycling Strategy, Suffolk County Council Walking and Cycling Infrastructure Plan and The Transport Mitigation Strategy for the Ipswich Strategic Planning Area.

Throughout the Borough, development should improve linkages to and quality of the public rights of way network, including cross boundary links, where opportunities exist to do so."

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM199 - Page N/A, New Policy

26722

Object

Respondent: Ravenswood Environmental Group**Summary:**

Concerns raised regarding amount and significance of re-drafting at Main Modifications stage. In effect a new Local Plan has been prepared. The amount of change for the Ravenswood sites is confusing. The suggested necessary changes required to the Local Plan to make it "sound" are so significant that the plan requires proper re-assessment through the formal Local Plan process. The consultation web page seeks to influence consultees through introductory remarks. Concerns regarding consultation process at earlier stages in terms of multiple site notices. This new policy has not been subject to proper SA or HRA. Fails to establish an access regime. Type and tenure of housing needs to be balanced. The type and tenure of housing is also a key concern here given that the Borough Council is committed to proposing a development consisting solely of Social Housing at sites UVW to the north in breach of a previously dismissed appeal. It is vital that any new residential development reflects the existing mix within Ravenswood to ensure that a balanced community is created to integrate within the locality. The S106 list at paragraph xv needs to be open. Our primary concerns remain. This is not a collection of small sites; it is a large mixed use allocation which will have serious environmental and social impacts. Further hearing sessions are necessary as per the March 2021 procedure guide for local plan examinations. The new plan is so different to the submission plan that it can't be considered a "modification" and is therefore not sound or legally compliant.

Change suggested by respondent:

At sub paragraph iii the New Policy should be clear that the mix of housing should be balanced with market housing and that a 15% quota (or other specified %) should be applied to the proportion of Affordable Housing proposed. Additionally, the affordable housing should include First Homes. At sub paragraph xv the S106 list is closed and needs to be open to mitigating the impact of the development. The list should be an open list stating that S106 Planning Obligations will be required to help to mitigate the environmental and infrastructure impacts of development. Financial contributions should include funding for a Recreation Avoidance Mitigation Strategy in the event that the New Plan is found sound. This would assist with mitigating the impact of industrial development and population growth upon the Orwell Estuary SPA, SSSI, RAMSAR site, Bridge Wood Local Wildlife Site and County Wildlife Site.

Legally No
compliant:

Sound: No

Attachments:

26784

Object

Respondent: Suffolk County Council**Summary:**

SCC supports this policy, but suggests a change for clarity. The policy explains that parts of the Ravenswood allocations are in the Minerals Consultation Area, however does not explain the significance of this. The purpose of safeguarding mineral resources (in this instance sand and gravel) is to prevent them from becoming permanently unusable. Therefore, developments sites over a certain size (5ha) where there may be usable mineral resources should assess the quality and quantity of the mineral to determine whether some of that mineral can be used in the construction of the development. Suggest amendment.

Change suggested by respondent:

The following amendment is proposed to clarify the policy.

"xiv. Sites IP150b and IP152 are over 5ha and fall within the Minerals Consultation Area and applications should be accompanied with an assessment of the quality and quantity of sand and gravel resources on site to determine if some of this mineral can be used in the construction of the development;"

It would also be helpful if relevant policies in the Suffolk Minerals and Waste Local Plan were identified in explanatory text to the policy: Policy MP10 Minerals Consultation and Safeguarding Areas.

Legally Not specified

compliant:

Sound: Not specified

Attachments:

26832

Object

Respondent: Natural England**Summary:**

Allocation IP150b is directly adjacent to the Brazier's Wood, Pond Alder Carr and Meadows County Wildlife Site (CWS) which could be affected by urbanisation and recreational disturbance as a result of the new Ravenswood policy sites. The CWS supports many breeding skylark territories. Breeding skylarks are susceptible to recreational disturbance, primarily from dogs-off-leads. You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 174, 175, 179 and 180 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

We welcome and commend the various new policy statements which seek to ensure biodiversity net gain.

Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Attachments:

MM200 - Page N/A, New Paragraphs**26723****Object****Respondent:** Ravenswood Environmental Group**Summary:**

Concerns raised regarding amount and significance of re-drafting at Main Modifications stage. In effect a new Local Plan has been prepared. The amount of change for the Ravenswood sites is confusing. The suggested necessary changes required to the Local Plan to make it "sound" are so significant that the plan requires proper re-assessment through the formal Local Plan process. The consultation web page seeks to influence consultees through introductory remarks. Concerns regarding consultation process at earlier stages in terms of multiple site notices. This new policy has not been subject to proper SA or HRA. Fails to establish an access regime. Type and tenure of housing needs to be balanced. The type and tenure of housing is also a key concern here given that the Borough Council is committed to proposing a development consisting solely of Social Housing at sites UVW to the north in breach of a previously dismissed appeal. It is vital that any new residential development reflects the existing mix within Ravenswood to ensure that a balanced community is created to integrate within the locality. The S106 list at paragraph xv needs to be open. Our primary concerns remain. This is not a collection of small sites; it is a large mixed use allocation which will have serious environmental and social impacts. Further hearing sessions are necessary as per the March 2021 procedure guide for local plan examinations. The new plan is so different to the submission plan that it can't be considered a "modification" and is therefore not sound or legally compliant.

Change suggested by respondent:

At sub paragraph iii the New Policy should be clear that the mix of housing should be balanced with market housing and that a 15% quota (or other specified %) should be applied to the proportion of Affordable Housing proposed. Additionally, the affordable housing should include First Homes. At sub paragraph xv the S106 list is closed and needs to be open to mitigating the impact of the development. The list should be an open list stating that S106 Planning Obligations will be required to help to mitigate the environmental and infrastructure impacts of development. Financial contributions should include funding for a Recreation Avoidance Mitigation Strategy in the event that the New Plan is found sound. This would assist with mitigating the impact of industrial development and population growth upon the Orwell Estuary SPA, SSSI, RAMSAR site, Bridge Wood Local Wildlife Site and County Wildlife Site.

Legally compliant: No

Sound: No

Attachments:

26833

Object

Respondent: Natural England**Summary:**

Allocation IP150b is directly adjacent to the Brazier's Wood, Pond Alder Carr and Meadows County Wildlife Site (CWS) which could be affected by urbanisation and recreational disturbance as a result of the new Ravenswood policy sites. The CWS supports many breeding skylark territories. Breeding skylarks are susceptible to recreational disturbance, primarily from dogs-off-leads. You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 174, 175, 179 and 180 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM201 - Page N/A, New Policy

26805

Object

Respondent: East of England Co-Operative Society**Agent:** Mr Matt Clarke**Summary:**

The East of England Co-operative Society objects to MM201, MM202 and PMC3 in connection with New Policy - Felixstowe Road, IP010 as follows:

- Object to treatment of the site as a single allocation;
- Object to implied reduced residential coverage for western site;
- Object to increased school site requirement;
- Object to inclusion of detail previously within site sheet as detailed criteria;
- Object to lack of explicit reference to viability considerations; and
- Object to bridge requirement.

New Policy - Felixstowe Road (IP010) as proposed through the Main Modifications is now a criteria based policy which, as a consequence of merging requirements for both sites as set out in the allocations tables under Policy SP2 (and SP7) from the Submission document (such as percentage residential on mixed use sites; indicative capacity, density and delivery timescales) in a more generalized manner. It is felt that this results in a loss of clarity, amongst other practical considerations.

Change suggested by respondent:

In the event that the single policy approach remains, for the avoidance of doubt, it is considered essential that any combined policy should explicitly refer to potential for each site to be delivered as a separate phase accordingly. Requested that the site area required to be safeguarded for education be returned to the previously stated 0.5ha.

Legally compliant: Yes

Sound: No

Attachments:

26741

Object

Respondent:**Summary:**

The development should include a new pedestrian route from Hines Road to Derby Road near Rose Hill School for the benefit of people from the Felixstowe Road area walking to the school or to Derby Road Station.

The provision of the new pedestrian route would make it a pleasanter journey and there would be less chance of an accident. Derby Road is often busy and the pavement is narrow. The new route would also reduce exposure to traffic pollution, and encourage more people to walk to school and to use Derby Road Station rather than travel by car.

Change suggested by respondent:

Require development to include a new pedestrian route from Hines Road to Derby Road.

Legally compliant: Not specified

Sound: Not specified

Attachments: None

MM202 - Page N/A, New Paragraphs

26806

Object

Respondent: East of England Co-Operative Society**Agent:** Mr Matt Clarke**Summary:**

The East of England Co-operative Society objects to MM201, MM202 and PMC3 in connection with New Policy - Felixstowe Road, IP010 as follows:

- Object to treatment of the site as a single allocation;
- Object to implied reduced residential coverage for western site;
- Object to increased school site requirement;
- Object to inclusion of detail previously within site sheet as detailed criteria;
- Object to lack of explicit reference to viability considerations; and
- Object to bridge requirement.

New Policy - Felixstowe Road (IP010) as proposed through the Main Modifications is now a criteria based policy which, as a consequence of merging requirements for both sites as set out in the allocations tables under Policy SP2 (and SP7) from the Submission document (such as percentage residential on mixed use sites; indicative capacity, density and delivery timescales) in a more generalized manner. It is felt that this results in a loss of clarity, amongst other practical considerations.

Change suggested by respondent:

In the event that the single policy approach remains, for the avoidance of doubt, it is considered essential that any combined policy should explicitly refer to potential for each site to be delivered as a separate phase accordingly.

Requested that the site area required to be safeguarded for education be returned to the previously stated 0.5ha.

Legally compliant: Yes

Sound: No

Attachments:

MM225 - Page, New Heading and New Paragraphs**26785****Object****Respondent:** Suffolk County Council**Summary:**

Policies which detail how development should approach the opportunity areas are supported with some amendments proposed. In particular the opportunity areas should also include the possibility for the development of community facilities to meet the needs of residential development. Specifically, SCC is mindful of the deficit of early years education places in the town centre and waterfront areas, recognised in the Statement of Common Ground between the County and Borough Councils.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:**26717****Support****Respondent:** Historic England**Summary:**

Welcome the inclusion of the changes agreed through our SoCG (I30.1). We particularly welcome the various revised policy wording and supporting text set out in Chapter 5 (Site Allocations and Policies) in relation to the historic environment within the IP-One Action Area. These modifications stipulate the approach to be followed with reference to both designated and non-designated heritage assets, making explicit where archaeological investigations and/or Heritage Impact Assessments will be required as part of the supporting evidence at the masterplanning/planning application stage. They also determine that the types and extent of archaeological remains will be a significant factor in informing the design, layout and construction methods of proposals. Historic England is satisfied that this additional work required can be undertaken prior to the determination of any planning application for these sites and will provide further feedback at the masterplanning and planning application stages of the development process. Also pleased to see the various references throughout the documents to the Council's substantial historic environment evidence-base, and SPDs. Overall Historic England is content that the modifications will ensure that adequate protection is given to the historic environment in and around the IP-One Area and are consistent with national policy.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Attachments:

MM230 - Page N/A, New Policy**26780****Object****Respondent:** Associated British Ports**Summary:**

Note that within Policy IP037 the site is allocated for 15% Public Open Space provision. This is based on the delivery of a 421-unit scheme (46 units per acre), defined as 'High Density' (35 units per acre and above). ABP however considers a lower density proposal of approximately 200 units (22 units per acre) is likely to be more viable on the site, which is defined in Policy DM29 as 'Medium' Density thus requiring 10% Public Open Space. Note that proposed level of density on the Island will be difficult to achieve in viability terms and alternative density (22 units per acre) should be used. Would welcome a flexible approach to access requirements as 200 dwellings on this site not significant enough to require a bridge and should not be a minimum requirement. Until the completion of the master plan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for a new road bridge. Support for access improvements subject to no adverse operational impacts on the port.

Change suggested by respondent:

Amend the capacity to a lower density proposal of approximately 200 units (22 units per acre). Remove requirement for bridge access at a minimum.

Legally Not specified
compliant:

Sound: Not specified

Attachments:

26786**Object****Respondent:** Suffolk County Council**Summary:**

The first section of the policy should include community facilities as part of the acceptable mix of uses to meet the needs of the residential population. This would make the policy consistent with the allocation for site IP037, which includes a requirement for early years facilities, as well as help to address the deficit in early years provision in the area. Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement "Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy."

Change suggested by respondent:

Include community facilities as an acceptable use. Include the requirement "Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy."

Legally Not specified
compliant:

Sound: Not specified

Attachments:

MM234 - Page N/A, New Policy

26787

Object

Respondent: Suffolk County Council

Summary:

Similar to opportunity area A, it would be helpful to include community uses to meet the needs of residents, such as early years facilities.

Change suggested by respondent:

Include community facilities as an acceptable use.

Legally Not specified

compliant:

Sound: Not specified

Attachments:

MM238 - Page N/A, New Policy

26788

Object

Respondent: Suffolk County Council

Summary:

Part f of this policy should be amended to "school and early years education" to help meet the deficit of early years places in the area.

Change suggested by respondent:

Amend Part f of this policy to "school and early years education".

Legally Not specified

compliant:

Sound: Not specified

Attachments:

MM246 - Page N/A, New Policy

26789

Object

Respondent: Suffolk County Council

Summary:

Similar to opportunity area A, it would be helpful to include community uses to meet the needs of residents, such as early years facilities.

Change suggested by respondent:

Include community facilities as an acceptable use.

Legally Not specified

compliant:

Sound: Not specified

Attachments:

MM250 - Page N/A, New Policy

26790

Object

Respondent: Suffolk County Council

Summary:

Part d of this policy should be amended to: Residential and community uses where appropriate within mixed use developments adjacent to the river.

Change suggested by respondent:

Amend part d of this policy to "Residential and community uses where appropriate within mixed use developments adjacent to the river."

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM254 - Page N/A, New Policy

26791

Object

Respondent: Suffolk County Council

Summary:

Part a of this policy should be amended to: Residential and community uses where appropriate within mixed use developments adjacent to the river. Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement "Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy."

Change suggested by respondent:

Amend Part a of this policy to "Residential and community uses where appropriate within mixed use developments adjacent to the river." Amend the second section to include the requirement "Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy."

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM258 - Page N/A, New Policy

26792

Object

Respondent: Suffolk County Council

Summary:

Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement "Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy."

Change suggested by respondent:

Amend the second section to include the requirement "Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy."

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM261 - Page 58, Policy SP15

26811

Support

Respondent: Seven Group

Agent: Mr Matt Clarke

Summary:

It is noted that reference is made within this proposed modification to the support that will be given to improving the pedestrian environment on key walking routes from the Waterfront to the Central Shopping Area, including along Turret Lane. We have no objection to this strengthening of the north-south axis in this manner and consider that developments that will increase activity levels in the area whilst improving the visual appearance of the streetscene and safeguarding the existing alignment of routes through Turret Lane should support this objective.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM262 - Page 61, Policy SP16

26800

Support

Respondent: Suffolk County Council

Summary:

Modifications to this policy are supported.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM263 - Page 63, Policy SP17

26801

Support

Respondent: Suffolk County Council

Summary:

Modifications to this policy are in line with what is agreed in statements of common ground between the Borough and County Councils and is and is supported.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM268 - Page N/A, New Policy

26797

Object

Respondent: Suffolk County Council**Summary:**

IP080: The policy acknowledges there is a relationship with a safeguarded minerals site. However, while this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it. For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used for IP080 (see suggested change).

IP120b & IP279: These site allocation policies do not recognise two safeguarded minerals and waste sites within 250 meters. These policies should contain the new text accordingly (see suggested change). While the safeguarded sites near to these allocated sites are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

Change suggested by respondent:

IP080: Amend existing policy wording regarding SMWLP to state: "The site allocation is within 250m of a safeguarded railhead and wharves in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the mineral and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facilities."

IP120b & IP279: Insert the following text into each policy: "The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities."

Legally Not specified

compliant:

Sound: Not specified

Attachments:

26803

Object

Respondent:**Summary:**

IP309: Concerns are; Access should not be via Seymour Road. It is already difficult and not safe to get in and out of the road as you cannot see traffic coming from the left of Rectory Road. With all the extra vehicles this will be made worse. These roads are only just able to cope with current traffic volume and are not wide enough to cope with any more. Refer to comments made to the planning application on this site in 2019. Police also sent a letter of objection to this planning application in 2019 due to high crime rate from Austin Street. Difficult to park in road some evenings and this would be worsened. Construction/ plant vehicles could damage vehicles. A notice should have been placed on Rectory Road.

Change suggested by respondent:

IP309: Alternative access should be used rather than Seymour Road.

Legally No

compliant:

Sound: No

Attachments:

26804**Object****Respondent:****Summary:**

IP309: Clarity is needed on what is being planned as new access from Seymour Road affects the road and property/ property prices. Parking on Seymour Road is already difficult due to Council painting double yellow lines to allow for safer access to bin lorries and permitting HMOs on this road reducing available parking for residents by 6 spaces. Nuisance parking makes it difficult for pedestrians. Noise and fumes from cars from 15 dwellings as proposed is a concern. Junction with Rectory Road already a safety concern. The boundary plan for the Old Close Boundary is incorrect. Refer to 2019 application and objections from SCC Highways.

Change suggested by respondent:

IP309: Alternative access should be used rather than Seymour Road. The boundary for IP309 is incorrect.

Legally Not specified
compliant:

Sound: Not specified

Attachments:

MM270 - Page N/A, New Policy**26799****Object****Respondent:** Suffolk County Council**Summary:**

IP279: This site allocation policy does not recognise two safeguarded minerals and waste sites within 250 meters. The policies should contain additional text (see suggested change). While the safeguarded sites near to this allocated site are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

Change suggested by respondent:

IP279: include the following additional text: "The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities."

Legally Not specified
compliant:

Sound: Not specified

Attachments:

26763

Object

Respondent: Her Majesty's Courts and Tribunals Service (HMCTS)

Summary:

IP245: The initial key observations / concerns are:

- As with any development/construction activity it will be produce noise, dust, vibration and other disturbances. This will have a vital impact on the courts as there can be no disruptions whilst hearings are ongoing.
- Construction deliveries, including plant etc, should not disrupt the court or access to it.
- During the construction phase there will need to be a pre-agreed time frames for noisy works to avoid disruption to court sittings.
- Please can you confirm if you intend to install windows on the side which overlooks the courts? If so, concerns it will overlook these hearing rooms.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments: None

MM279 - Page N/A, New Policy

26795

Object

Respondent: Suffolk County Council

Summary:

IP003: In part 'b' of this policy, it is recommended that the word "retention" is replaced with the word "safeguarding". This would make the language of the policy more in line with chapter 17 of the NPPF and the Suffolk Minerals and Waste Local Plan.

Change suggested by respondent:

Replace "retention" with "safeguarding" in part b.

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM281 - Page N/A, New Policy**26796****Object****Respondent:** Suffolk County Council**Summary:**

IP004: While the current wording does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it. For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used (see suggested change). While the safeguarded sites near to IP004 are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

Change suggested by respondent:

For consistency and clarity it is recommended that part i of this policy is replaced by: "The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities."

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM285 - Page N/A, New Policy**26742****Object****Respondent:****Summary:**

IP035: Objection to the proposed local plan site allocation. Here are my reasons in brief:

- This area is the only community green space in the area.
- Air pollution is already high in the area, more people = more cars = more pollution.
- The roads in the area are frequently congested already.
- A multi-storey development would block light to various dwellings in the area.
- There is no shortage of housing in this area already due to existing waterfront developments.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments: None

26812

Object

Respondent: Random Camel Housing Co-Operative

Agent:

Summary:

IP035: The area already suffers from heavy air pollution (as Stoke Bridge suffers from heavy air pollution due to being one of few transits over the River Orwell) and is some of the highest in Europe. Building 86 dwellings and commercial properties here would only increase traffic congestion and air pollution compounded by the existing bus depot to the north-east of the site. Also concern regarding the impact of construction.

This is the only green space on the entirety of that map. No other multiflora green space in the vicinity of this area before Alexandra, Christchurch or Gippeswick Park. Existing buddleia bushes are a haven for insect life, flora should be intensified and diversified.

There have been a number of developments nearby in the vicinity of the Waterfront and asks if it is at capacity for housing. There is not a housing shortage in Ipswich, much less a collection of properties owned by portfolio enterprises.

The open space allows sunlight down Foundation Street and Lower Brook St and other adjoining streets. Development would cause overshadowing.

Change suggested by respondent:

We hope this plan site allocation should not go through.

Legally Not specified

compliant:

Sound: Not specified

Attachments: None

MM297 - Page N/A, New Policy

26809

Object

Respondent: Seven Group**Agent:** Mr Matt Clarke**Summary:**

IP054b: Object to the intended residential element being referred to as the primary use. Given the bulk and scale of some of the existing buildings present on the allocation site as a whole, it is felt that achievement of the indicative target capacity of 40 dwellings could be secured on a relatively small portion of the site, meaning that this would not necessarily represent the primary use. Also object to inclusion of detail previously within site sheet as detailed criteria at this late stage in the Local Plan process. It is of concern, as a matter of principle, that information previously contained as guidance or information within the Site Sheets is now proposed to be included as "Policy" through this Main Modifications process. This is on the basis that this would now have increased status in the decision making process relative to its previous presentation within an Appendix. An example of this is the requirement under criteria a. for flood risk assessment for any development proposals, or under criteria d. for archaeological assessment. A preferred approach would be to note that in all instances a degree of discretion will be applied, in accordance with the acknowledgement under criteria c. for instance, that Heritage Impact Assessment will be required on a proportionate basis.

In respect of criteria n. it should be clarified that S106 contributions will apply to residential development proposals, as distinct from uses within the other commercial use class allowed for, unless this is considered to be adequately covered by reference to the term "as appropriate."

The apparent change from a residential-led allocation to a more balanced mixed use approach is supported by Seven Group. A mixed use approach is more appropriate.

Change suggested by respondent:

IP054b: Request that reference to 60% residential coverage and to residential being the primary use be deleted. Clarify in criteria n that S106 contributions only apply to residential development.

Legally Yes**compliant:****Sound:** No**Attachments:**

MM298 - Page N/A, New Paragraphs**26810****Support****Respondent:** Seven Group**Agent:** Mr Matt Clarke**Summary:**

Noted that much of the text included in the proposed supporting text to this new policy has been drawn from the relevant Site Sheet previously contained within Appendix 3 of the Submission Plan. On this basis we have no objection to this, and consider that this provides generally provides helpful commentary. Within the fourth new paragraph of supporting text it is noted that reference is made to the need for introduction of a landmark building at the corner of Star Lane and Turret Lane, highlighting the adjacent cylindrical building at the junction of Star Lane and St Peter's Street as an example of best practice in this regard. As this forms part of Seven Group's existing premises they are naturally pleased that it has been referred to in this context, and hopefully provides comfort and reassurance of their track record and willingness to work with IBC.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM299 - Page N/A, New Policy**26798****Object****Respondent:** Suffolk County Council**Summary:**

IP119: This site allocation policy does not recognise two safeguarded minerals and waste sites within 250 metres. It should contain new text (see suggested change). While the safeguarded sites near to the allocated site are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

Change suggested by respondent:

Insert new text into policy IP119: "The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities."

Legally compliant: Not specified

Sound: Not specified

Attachments:

MM305 - Page N/A, New Policy

26768

Object

Respondent: Associated British Ports**Summary:**

IP037: Associated British Ports support the principle of the allocation. Note that within Policy IP037 the site is allocated for 15% Public Open Space provision. As well as maintaining its operational activities, ABPorts is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. ABP reserve the right to continue the Island Site as operational port area and to restrict access in the interests of public safety and port security until a satisfactory scheme is agreed with IBC. The allocation is based on the delivery of a 421-unit scheme (46 units per acre), defined as 'High Density' (35 units per acre and above). ABP however considers a lower density proposal of approximately 200 units (22 units per acre) is likely to be more viable on the site, which is defined in Policy DM29 as 'Medium' Density thus requiring 10% Public Open Space. Note that proposed level of density on the Island will be difficult to achieve in viability terms and alternative density (22 units per acre) should be used. Would welcome a flexible approach to access requirements as 200 dwellings on this site not significant enough to require a bridge and should not be a minimum requirement. Until the completion of the master plan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for a new road bridge. Support for access improvements subject to no adverse operational impacts on the port.

Change suggested by respondent:

Amend the capacity to a lower density proposal of approximately 200 units (22 units per acre). Remove requirement for bridge access at a minimum.

Legally compliant: Not specified

Sound: Not specified

Attachments:

26793

Object

Respondent: Suffolk County Council**Summary:**

IP037: The inclusion of the early years setting in policy IP037 is welcome, however in order to be clear about the requirements of the site it is recommended that the policy specify the land area for the early years requirement. Table 80 identifies that 90 places should be provided on this site. SCC would request, 1292.7m² or 0.13ha (rounded up).

The policy acknowledges there is a relationship with safeguarded waste sites. However, while this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it. For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used (see suggested change).

Change suggested by respondent:

Specify that 0.13ha is required for early years on the site. Amend the policy to state: "The site allocation is within 250m of a safeguarded waste use site, a railhead and wharves in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the mineral and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facilities."

Legally Not specified**compliant:****Sound:** Not specified**Attachments:****MM307 - Page N/A, New Policy**

26794

Object

Respondent: Suffolk County Council**Summary:**

IP048a-d: The New Policy for the Mint Quarter includes does not include the early years setting associated with the primary school, which is recognised in Table 8a, is not included in the policy. For completeness the policy should be amended to state: "Mint Quarter/Cox Lane East Regeneration Area facing Carr Street (IP048d): 0.43ha for a primary school and early years provision".

Change suggested by respondent:

Amend the policy to state: "Mint Quarter/Cox Lane East Regeneration Area facing Carr Street (IP048d): 0.43ha for a primary school and early years provision."

Legally Not specified**compliant:****Sound:** Not specified**Attachments:**

Supporting Documents

Policies Map and IP-One Area Inset Map Schedule of Proposed Changes

Ipswich Local Plan 2018 – 2036 Sustainability Appraisal Report

Habitats Regulation Assessment – Ipswich Local Plan Core Strategy and Policies DPD Review (Addendum relating to the Proposed Main Modifications)

Habitats Regulations Assessment - Ipswich Borough Local Plan Site Allocations and Policies (Incorporating IP-One Area Action Plan DPD Review (Addendum relating to the Proposed Main Modifications))

K Documents – Additional evidence submitted during and after the Hearing

Record count: 11

Supporting Documents, Policies Map and IP-One Area Inset Map - Schedule of Proposed Changes (July 2021)

26716

Support

Respondent: Historic England**Summary:**

We're particularly pleased to see the amendment to the Tall Building Arc (reference PCM39) to pull back the arc boundary in the immediate vicinity of the Grade I listed Willis Building and the churchyards of St Peter's Church, St Mary at the Quay, and St Nicholas Churches.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

26807

Object

Respondent: East of England Co-Operative Society**Agent:** Mr Matt Clarke**Summary:**

The East of England Co-operative Society objects to MM201, MM202 and PMC3 in connection with New Policy - Felixstowe Road, IP010 as follows:

- Object to treatment of the site as a single allocation;
- Object to implied reduced residential coverage for western site;
- Object to increased school site requirement;
- Object to inclusion of detail previously within site sheet as detailed criteria;
- Object to lack of explicit reference to viability considerations; and
- Object to bridge requirement.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Attachments:

26808

Support

Respondent: Seven Group

Agent: Mr Matt Clarke

Summary:

IP054b: PMC29: Consistent with the comments set out in our representations we support the more balanced mixed use approach to the site allocation contained within this modification to the proposals map, including reference to employment uses.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

Supporting Documents, Sustainability Appraisal of Main Modifications (July 2021)

26724

Object

Respondent: Ravenswood Environmental Group

Summary:

The New Policy for "Sites off Nacton Road, South Ravenswood" has not been subject to proper Sustainability Assessment or Habitats Regulations Assessment because the updated versions of those documents add nothing to the previous assessments which failed to look at cumulative impacts of a 22.7 Hectare site.

Change suggested by respondent:

N/A

Legally compliant: No

Sound: No

Attachments:

26834

Support

Respondent: Natural England

Summary:

We are satisfied that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. Furthermore the SA of the main modifications contains a robust assessment of the environmental effects of plan policies and allocations on statutorily (and non-statutorily) designated sites and landscapes including the Orwell Estuary SPA, SSSIs and the Suffolk Coast and Heaths AONB and has taken into account both our advice and the findings of the HRA.

We also wish to state that we support the recommendation for a coherent GI network, which would improve have multiple beneficial effects including improving access to nature, mitigation for recreational impacts on designates sites and improvements to local biodiversity.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Not specified

Attachments:

Supporting Documents, Habitats Regulations Assessment - Ipswich Borough Local Plan Core Strategy and Policies DPD Review (Addendum relating to the Proposed Main Modifications) (July 2021)

26835

Support

Respondent: Natural England

Summary:

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any related planning permissions given.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Not specified

Attachments:

Supporting Documents, Habitats Regulations Assessment - Ipswich Borough Local Plan Site Allocations and Policies (Incorporating IP-One Area Action Plan DPD Review (Addendum relating to the Proposed Main Modifications) (July 2021)

26725

Object

Respondent: Ravenswood Environmental Group

Summary:

The New Policy for "Sites off Nacton Road, South Ravenswood" has not been subject to proper Sustainability Assessment or Habitats Regulations Assessment because the updated versions of those documents add nothing to the previous assessments which failed to look at cumulative impacts of a 22.7 Hectare site.

Change suggested by respondent:

N/A

Legally compliant: No

Sound: No

Attachments:

26836

Support

Respondent: Natural England

Summary:

In our previous consultation response on the above (dated 24th September 2021, our ref: 361910), we advised that:

- 'having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that it is not possible to ascertain that the plan will not result in adverse effects on the integrity of the sites in question.'
- 'the assessment does not currently provide enough information and/or certainty to justify the assessment conclusion and that your authority should not adopt the plan at this stage.'

The council has since provided further information and clarification on how this advice had already been captured by their core strategy policy DM8 and their active Suffolk Coast RAMS SPD. The council highlighted that the residential planning policies within the 'Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD' outline site constraints only and compliance with the core strategy policy DM8 and RAMS SPD are sufficient to provides the necessary safeguards with respect to this issue.

On this basis, we agree with the councils reasoning and are now satisfied that the Plan will not result in adverse effects on the integrity of any of the European sites in question, providing that all mitigation measures are appropriately secured in any related planning permissions, consistent with the Plan policy. As such this advice supersedes our previous consultation letter (dated 24th September 2021, our ref: 361910).

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Attachments:

Additional evidence submitted during and after the Hearing, K11 - Ravenswood Capacity Management Options Dec 2020

26727

Object

Respondent: Ravenswood Environmental Group

Summary:

The New Policy fails to establish an access regime for the site when it is clear that this was a primary concern of the now defunct appendix 3 alongside the Submission Local Plan. The Borough Council had previously "floated" the idea that it would be relocating the Ravenswood bus-gate at Core Document K11. That suggestion served to emphasise that no new primary all vehicle access would be proposed for the development yet the Transport Assessment work and Local Plan drafting to date is vague. The ideas of K11 are absent from the New Policy.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

Additional evidence submitted during and after the Hearing, K12 - IBC Note on compliance with SCI in response to SOCS and REG comments Dec 2020

26726

Object

Respondent: Ravenswood Environmental Group

Summary:

The Local Plan Main Modifications has been advertised with site notices which now show each of the IP150 sites on the same plan. This consultation therefore exposes the Borough Council's previous protestations in core document K12 that a plan-based site notice which doesn't show adjacent sites is not misleading. In the 15th January 2020 Consultation, residents were looking at a site notice in front of a 1.8 hectare site but on 23rd July 2021 residents were being presented with a site notice, on the same lamppost, alerting them to a 22.7 Hectare site proposed in various individual but related parts.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Attachments:

Additional evidence submitted during and after the Hearing, K22 - IBC Ipswich Garden Suburb Responses Jan 2021

26703

Object

Respondent: Mersea Homes Limited

Summary:

The Council and/or Aspinal Verdi are unable to explain why the infrastructure costs assumed by Aspinal Verdi for the Ipswich Garden Suburb (£79,000 per acre) bore no relationship whatsoever to the actual infrastructure costs that were agreed as part of the two site specific viability appraisals for Henley Gate and Fonnereau (£420,000 per acre). Where there are detailed appraisals that have been prepared for the actual development site in question, that have been through a due process of peer review and testing, and which are agreed between the developers and the Council, these have to be afforded greater weight than a generic Whole Plan assessment that has not. It is obvious that the four items of infrastructure listed in the Whole Plan Viability Assessment are just generic items applicable to essentially any development, and do not take in to account the full infrastructure costs.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: No

Attachments: