

Ipswich Local Plan

Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options January - March 2019

How we have taken into
account comments from
the Preferred Options (Reg 18) consultation



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1. Introduction

This Consultation Statement has been prepared by Ipswich Borough Council as part of the Council's Local Plan documentation. In accordance with the requirements set out in Regulation 18 (1) (2) (3) and Regulation 22(1) (i-iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's adopted Statement of Community Involvement, this report sets out how the Council has involved the local community, stakeholders, and statutory bodies in the formulation of the Local Plan 2018 -2036. It covers the second stage of consultation to present the preferred options for the Local Plan Review.

The Statement of Community Involvement Review 2019 ([SCI https://www.ipswich.gov.uk/content/statement-community-involvement-review](https://www.ipswich.gov.uk/content/statement-community-involvement-review)) outlines that the Council is committed to effective community engagement, and seeks to use a wide range of methods for involving the community in the plan making process.

The report outlines the following details;

- Title of the consultation and the consultation period,
- Who was invited to make representations and how they were invited to do so
- The number of representations made and a summary of the main issues raised by the representations made; and
- How any representations made have been taken into account in the plan preparation process

Copies of the Ipswich Local Plan Review Preferred Options representations made in accordance with Regulation 18 are available to view on the [Council's web site https://www.ipswich.gov.uk/](https://www.ipswich.gov.uk/). A schedule of the representations and the Council's responses will be published for information alongside the consultation comments.

The production of the Local Plan is informed by, and subject to, the following assessments, in accordance with the relevant regulations.

- Sustainability Assessment and Strategic Environmental Assessment
- Habitat Regulation Assessment
- Equality Impact Assessment

Relevant documentation is published for public consultation alongside the Preferred Options Draft Plan.

The Council has established a clear mechanism to engage constructively with relevant landowners, developers, infrastructure providers and other stakeholders through the process of preparing and implementing and delivering the Local Plan, as required by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and as set out in the Council's Statement of Community Involvement.

An eight-week public consultation took place between 16th January and 13th March 2019 in which 600 individuals, organisations and local authorities responded to the consultation. In total 413 comments were made on the Core Strategy and Policies DPD, 160 on Site Allocations and Policies (incorporating IP-One Area Action Plan) and a further 27 submissions distributed between the Sustainability Appraisal, Habitats Regulation Assessment, Flood Risk and Archaeological Importance plans and Draft Strategic Housing & Economic Availability Assessment (SHELAA) documents.

Who did we consult?

Consultee by contact preference	Total
Postal (Private individuals)	24
Postal (Companies and Organisations)	28
Postal and Email (Statutory and Non-Statutory)	
Email (Private individuals)	
Email (Companies and Organisations)	

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

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

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

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

Whitehouse Community Primary School
Whitton Community Primary School
Wild Anglia Local Nature Partnership/New Anglia Local Enterprise Partnership
Willow Park Montessori Day Nursery
Wood Plc on behalf of National Grid
Individuals and organisations
Includes individuals, planning and estate agents, developers, land owners, schools, local businesses and others on the Ipswich Local Plan mail list.

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3.How did we consult

Drop-in exhibitions and Area Committees

Planning officers were on hand to discuss the local plan at various drop-in events and area committees in Ipswich throughout January and February 2019.

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

Consultation documents and materials online and at exhibitions

Documents	Details
Core Strategy and Policies DPD Review Preferred Options (November 2018) + Tracked Change version	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Plan 1 (District and Local Centres), Plan 2 (Flood Risk), Plan 3 (Conservation Areas), Plan 4 (Area of Archaeological Importance including Scheduled Ancient Monuments), Plan 5 (Ipswich Ecological Network) and Plan 6 (Green Corridors) (November 2018)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Sheets (IP003 – IP348)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review Preferred Options (November 2018) + Tracked Change version	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Local Plan Policies Map (November 2018) Local Plan Policies Map IP-One Area Inset (November 2018)	PDFs online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House

Strategic Environment Assessment and Sustainability Appraisal (includes Non-Technical Summary) and Appendices A -E (January 2019)	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Habitats Regulations Assessment of the Ipswich Borough Local Plan at Preferred Options Stage (January 2019)	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Site Notices	Notices placed on the vicinity of every proposed site allocation
Draft Statement of Common Ground with the Ipswich Strategic Planning Area Authorities (November 2018) Issues and Options Consultation Statement (November 2018) Equality Impact Assessment Statement of Compliance with the Duty to Co-Operate	Evidence-based documents available for download online
Ipswich Garden Suburb (IGS) Housing Retail & Town Centre Air Quality, Transport & Green Infrastructure Economy	Topic Papers available for download online
Draft Strategic Housing & Economic Land Availability Assessment (SHELAA) and Site Map	PDF online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
GIS Online Service	Interactive mapping service available
Consultation Module Site	Interactive consultation system that enables those to register and comment online
Comments Form	PDF and word versions online and hard copies available at Area forums, exhibitions, Ipswich Town Hall, County Library and Council Offices, Grafton House
Letters/emails	Sent to contacts on the local plan mail list (including private individuals and statutory consultees) informing of consultation dates of exhibitions
Presentations at the Area Committees	Planning officers gave a talk outlining (on A1 boards) the main issues and facts in the Core Strategy and Site Allocations documents of the Local Plan
A4 Preferred Options "What is a Local Plan" leaflet	Available to take away at exhibitions
Ipswich Borough Council Social Media feeds	Regular notifications and opportunity to interact on Facebook and Twitter

Informing the public

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

Media and publicity

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

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4. Overview of Public Consultation Undertaken

Following preparation of the evidence base and early stakeholder consultation during early 2017, the council prepared an Ipswich Local Plan Preferred Options Consultation (January – March 2019) to commence its public consultation for the Ipswich Local Plan 2018-2036.

The remaining stages of consultation will follow from Jan 2019; the current timetable is as follows;

- Local Plan Preferred Options public consultation (Regs 18) January – March 2019
- Publish Draft Proposed Submission Local Plan for inspection and invite representations (Regs 19-20) October - November 2019
- Submission of Local Plan to Secretary of State early (Regs 22) March 2020
- Independent Examination Hearing in Public by an independent Planning Inspector (Regs 24) June 2020
- Receive and publish Inspector's Report and recommendations on the Local Plan (Regs 25) September 2020
- Consider the recommendations included in the Inspector's Report and adopt the Local Plan (Regs 26) December 2020.

5. Preparation of the evidence base and early stakeholder engagement

The Council has undertaken a significant amount of work in compiling an evidence base to support the plan review. This has involved the completion of a number of studies as well as working with key stakeholders across the district. Details of the evidence base and supporting studies used to prepare the Local Plan can be found on the Council's website.

Meetings were held between April 2017 and August 2017, with stakeholders (e.g. infrastructure providers, housebuilders, planning agents and registered providers) as part of the evidence gathering phase. The purpose of these preliminary meetings was to explain how the Local Plan would be reviewed to encourage involvement from an early stage and to identify issues and concerns of those various interests ahead of preparing the Issues and Options consultation document. These meetings explored the issues facing the borough and discussed the use of land in the borough and neighbouring districts over the next twenty years. The resulting evidence may be found here (published studies indicate workshops or other engagement which took place).

6. The Ipswich Local Plan Review 2018 - 2036: Preferred Options Consultation

The consultation was carried out for eight weeks between Wednesday 16th January and Wednesday 13th March 2019. During this time people were able to comment on the Draft Review Preferred Options, Habitat Regulations Assessment and the Sustainability Appraisal (including Strategic Environmental Assessment) Scoping Report.

In accordance with the Council's [Statement of Community Involvement \(SCI\)](#), consultation arrangements included:

- Consultation over eight weeks from 16th January to 11:45pm on 13th March 2019;
- Emails and letters sent to all on the Ipswich Local Plan mail list informing consultees of consultation dates and how to view and respond to the consultation material (see Who did we Consult? for list of consultees);
- A public notice was placed in the Ipswich Star and East Anglian Daily Times, providing details of the consultation including where documents could be viewed and dates and times of the exhibitions (see Appendix C);
- Consultation packs with paper copies of the Ipswich Local Plan Review Preferred Options documents were placed at the County Library, Ipswich Town Hall and Grafton House reception area to publicise the consultation and exhibition dates and advise how to view the document and make comments;
- The Notice of consultation and all documents were made available on the Council's website under 'current consultations' and on the [planning policy](#) web page;

- The Council's electronic planning [consultation module site](#) was available for submitting representations online (see Appendix B) to encourage people to submit comments electronically (a more efficient way to make representations). People were also welcome to contribute via email, letter and with comment forms;
- A number of exhibitions on the Review Preferred Options took place at various venues in Ipswich throughout January and February, including the Town Hall and Council offices
- The consultation and exhibitions were also promoted via the IBC Twitter and Facebook pages (details in Appendix D).

This section explains how the Council took into account comments raised during the Ipswich Local Plan Preferred Options Review based on the responses received through consultation.

It also highlights where changes to the Ipswich Local Plan Preferred Options Review have been undertaken that were not made directly in response to objections. These non-consultation related changes have been shown in this Consultation Statement for clarity. It should be noted however that new sites have only been included in the Statement where they have been included in response to a specific objection.

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How did people respond?

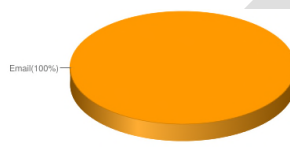
Formal representations submitted for Ipswich Local Plan Preferred Options

	Respondent	Web	Email	Paper	Total Comments
Core Strategy and Policies DPD Review	56	18	320	75	413
Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review	42	5	129	26	160
Documents for Download	12	0	27	0	27
Total		23 (3.8%)	476 (79.3%)	101 (16.8%)	

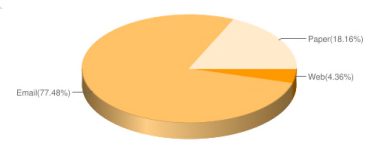
Consultation Module (JDi)



Site Allocations and Policies



Documents for Download

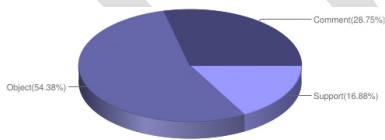


Core Strategy and Policies

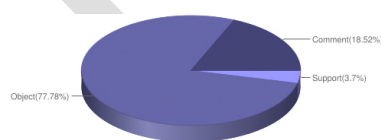
Support/ Object/ Comment - What people thought

	Comment	Object	Support	Total
Core Strategy and Policies DPD Review	95	251	67	413
Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review	46	87	27	160
Documents for Download	5	21	1	27
Total	146	359	95	600

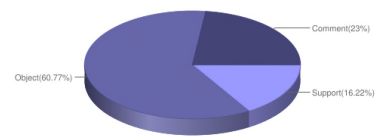
Consultation Module (JDi)



Sites Allocations and Policies



Documents for Download



Core Strategy and Policies

Core Strategy and Policies DPD Review

Representations (overall)	Comment	Object	Support
413	95	251	67

1. Chapter 1 – Introduction

Representations	Comment	Object	Support
4		3	1

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

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

		Serious adverse effects, as required under NPPF 6 - 17, have not been properly identified. NPPF-11 has not been adequately taken into account.
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Developers and Landowners

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

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

The Adopted Local Plan was found sound in 2017 and the Local Plan Review process has not led to a root and branch change, but the opportunity has been taken to update content in the vision and objectives, the policies and supporting text and site allocations, in the light of: The National Planning Policy Framework July 2018; Joint work with neighbouring local planning authorities on joint or aligned local plan reviews, including the Statement of Common Ground (March 2019); The policies and proposals of organisations and partners, such as the Marine Management Organisation, the New Anglia Local Enterprise Partnership and the Ipswich Vision Board; New evidence, for example from monitoring or research; Emerging case law; Issues arising from the experience of the Council's Development Management Team interpreting and implementing policies; Submissions at the Issues and Options

consultation stage; and The Council's priorities responding to new challenges facing Ipswich. The Council considers that the Local Plan delivers on the stated objectives and is compliant with The National Planning Policy Framework, July 2018. The NPPF has since been updated on 19 February 2019 following a technical consultation to redefine deliverable housing. The February 2019 NPPF amendments have not been reflected in the Ipswich Local Plan Review Preferred Options, as the February 2019 NPPF update was published when the Preferred Options Local Plan was out for consultation but will be reflected in the Regulation 19 Local Plan.

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

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

2. Chapter 2 – The Planning System

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

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

3. Chapter 3 – The Local Enterprise Partnership

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations
Developers and Landowners
Members of the public

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

No change recommended

4. Chapter 4 – The Duty to Co-operate

Representations	Comments	Object	Support
5	0	3	2

Parish and Town Councils

The following comments were made in response to this issue:

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

Statutory Consultees

The following comments were made in response to this issue:

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

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25841	Ravenswood Environmental Group	The Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters is weak. Given that Ipswich cannot meet its own development needs it is of some concern

		that a closer working arrangement has not been created. Ipswich is an important sub regional centre. The other two similar centres in the region are Norwich and Cambridge. Norwich City is planned as part of the Greater Norwich Local Plan. Cambridge is planned with South Cambridgeshire as Greater Cambridgeshire but Ipswich is not coordinating its growth on the same statutory basis. Consideration must be given to a joint Local Plan.
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Developers and Landowners

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Members of the public

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

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

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

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

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

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

The Council has identified sufficient land to meet its objectively assessed need. It has also identified a 5.07-year supply. However, a number of sites have difficulties such as complicated ownership or severe constraints such as archaeology which may mean they will take longer to come forward. These have been identified as 'opportunity sites', however they have not been counted as sites helping to meet the Ipswich objectively assessed need. The Council has undertaken a number of steps to address housing supply issues eg it undertook a complete review of site density that identified an additional circa 600 dwellings, but this was counteracted by sites which have had to be removed from the Plan for example, to meet educational requirements. It also has taken a relatively radical approach to the Housing Delivery Plan to try to ensure sites come forward.

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

5. Chapter 5 – Ipswich – The Place

Representations	Comments	Object	Support
1	0	0	1

Other Organisations

The following comments were made in response to this issue

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

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

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

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

6. Chapter 6 – Vision and Objectives

Representations	Comments	Object	Support
15	0	15	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26043	Historic England	Note reference to higher density homes but are concerned that it's treated as a synonym for flats. High density doesn't need to take the form of flats (see Increasing Residential Density publication 2018). Request is made clear that high density does not equal flats.

		<p>Welcome references to parks and open spaces, built and natural heritage. However, we recommend that the phrase 'built and natural heritage' is amended to 'built, natural and historic environments'. We would like to see a flavour of the town's heritage reflected in the Vision similar to the descriptions for the town's parks and tree canopy.</p>
25701	Suffolk Chamber of Commerce	<p>Fully supports 'The Vision and Objectives'. Although we appreciate the need for more homes, we also hope the Council recognises the importance of further, high-quality business space in the town, including The Princes Street Corridor. We hope the Council will look to include further office space around the town which would also ease traffic and parking issues around The Princes Street Corridor. Mixed-use developments could help support this aim by providing homes, offices, shopping and leisure facilities near to one another. We strongly recommend that sites currently allocated for employment are sustained and if possible, further space is provided.</p>
25702	Suffolk Chamber of Commerce	<p>To support business growth and visitor numbers to Ipswich will require improvements to the transport network. Therefore, Suffolk Chamber of Commerce welcomes all improvements to the transport network including proposals for a Northern Bypass, improvements to the Orwell Bridge and an enhanced public transport system. Furthermore, with aims to reduce emissions, Suffolk Chamber feels strongly that cycling in Ipswich needs to be improved as the current infrastructure is lacking, and dangerous where it does exist. Similarly, much more needs to be done to deliver a viable network of electric vehicle charging points.</p>
25987	Suffolk County Council	<p>The most robust way this Plan could fulfil its potential in respect of health outcomes would be to undertake a formal Health Impact Assessment, separately, if this is not possible, through enhanced analysis of health issues through the Sustainability Appraisal. Design plays a significant role in promoting healthy built environments. It is hoped that the forthcoming countywide design guidance will provide a strong framework for detailed consideration of health as a design issue. The</p>

		Borough Council should consider whether the Plan provides a strong policy hook for requiring the implementation of the health recommendations of the Design Guidance.
25993	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 4: People in Suffolk have the opportunity to improve their mental health and wellbeing:</p> <p>The planning system can support better mental health by enabling and encouraging exercise and access to green space. Design can also contribute by discouraging feelings of being enclosed, creating places which feel safe and by creating environments which encourage social interaction. This could be covered in forthcoming countywide guidance on design, but the Plan could provide a policy hook.</p> <p>The Plan considers suitable community facilities, and the County Council will work with IBC in respect of library facilities.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25656	Northern Fringe Protection Group	<p>The Core Strategy removes the commitment to improve air quality despite the number of AQMAs in Ipswich continuing to increase.</p> <p>Objective 6 - Given the distinct lack of progress an additional indicator is required to measure improvements in cycling infrastructure.</p> <p>IBC needs to start taking more positive actions to improve accessibility as it is currently non-compliant with CS5.</p> <p>Objective 12 - This indicator is vague and gives no measure of beneficial outcomes from working together. Needs to include strategic infrastructure.</p> <p>The latest AMR for 2017/18 has not been published and we need the opportunity to review this.</p>
25865	Save our Country Spaces	<p>The following issues need to be addressed for the core strategy to be 'sound':</p> <ol style="list-style-type: none"> 1. Drainage/ surface water drainage 2. Likelihood of flooding increase. 3. Sewage proposals inadequate and likely to add to existing problems

		<p>4. Traffic proposals and adverse impacts on existing residents.</p> <p>5. Air pollution and impact on our children's health inadequate.</p> <p>6. Adverse pressures on Hospitals, schools and access to GPs and social care.</p> <p>7. Adverse effects of road widening and removal of trees/ verges.</p> <p>8. Loss of high grade land;</p> <p>9. Removal of trees, hedgerows and habitats</p> <p>10. Country Park delivery</p> <p>11. Where is the need?</p>
25867	Save our Country Spaces	The Plan goes against all the aims and ambitions of this local charity. It would have a detrimental effect on the charity and its aims and objectives. It will irretrievably damage the small spaces which the charity has been working on for 8 years.
25874	Save our Country Spaces	<p>The following issues need to be addressed for the core strategy to be 'sound':</p> <ol style="list-style-type: none"> 1. Drainage/ surface water drainage 2. Likelihood of flooding increase. 3. Sewage proposals inadequate and likely to add to existing problems 4. Traffic proposals and adverse impacts on existing residents. 5. Air pollution and impact on our children's health inadequate. 6. Adverse pressures on Hospitals, schools and access to GPs and social care. 7. Adverse effects of road widening and removal of trees/ verges. 8. Loss of high grade land; 9. Removal of trees, hedgerows and habitats 10. Country Park delivery 11. Where is the need?
26130	Ipswich and East Suffolk Clinical Commissioning Group	<p>The CCG is glad to see the importance given to strategic planning for the provision of health care.</p> <p>NHS England and the CCG welcome the importance given to health and wellbeing and recognises the impact health and wellbeing has on reducing impact on healthcare facilities.</p> <p>NHS England and the CCG are pleased to see so many policies in the LP with the objectives supporting healthy and active communities through improving health, wellbeing and education opportunities for all.</p>

		The CCG would like to highlight the work being done at community level by the NHS in the area at preventing ill health.
26131	Ipswich and East Suffolk Clinical Commissioning Group	We would suggest that one of the key priorities of this document should be ensuring sustainable primary care provision for communities both existing and proposed.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25641	Turnberry Consulting on behalf of Grainger PLC	The document is unsound and not legally compliant for reasons summarised: 1. Ineffective as it does not allocate an adequate number of deliverable sites over the plan period to maintain the housing need of the Borough; 2. Fails to allocate sufficient land within its early phases to ensure the Borough's five-year housing land supply is met alongside a buffer to compensate for significant under-delivery of housing; 3. It heavily relies on a single strategic allocation; and 4. Fails in its Duty to Cooperate in terms of achieving a series of deliverable sites within the early stages of the Plan
25817	Cardinal Lofts (Mill) Ltd	The Company supports the general vision as is set out at paragraph 6.7. It is also in general agreement with the Objectives (paragraph 6.8), but considers that there should be explicit recognition that, unless development is financially viable (or subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved.
25926	Ashfield Land Limited	We support the recognition in the vision that by 2036 a range of new homes should be provided across the Borough and, importantly, within the Housing Market Area, to meet needs. The amount of new homes needed cannot be provided within the administrative boundary of Ipswich alone. It is therefore important to recognise the role of the wider Housing Market Area in the Vision. The Vision also rightly refers to growth in the Ipswich economy. To deliver this vision, it is

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

The following made no comments in response to this issue.

Parish and Town Councils
Members of the public

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

See 'Vision' and 'Objectives' responses below.

7. The Vision

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue.

Rep. ID. No.	Respondent	Summary
25746	Historic England	Support the Plan's vision to protect and enhance the natural environment The plan should take a strategic approach to the protection and enhancement of the natural environment, in accordance with paragraphs 170 and 174 of the NPPF and the Defra 25 Year Environment Plan (YEP), including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action

		Plan, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies, Nature Recovery Network (amend as appropriate to the local area).
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Members of the public

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

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

Support Noted.

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

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

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

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

8. The Objectives

Representations	Comments	Object	Support
24	0	17	7

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25734	Environment Agency	Paragraph 6.13 states that sites alongside the river in much of central Ipswich reside within Flood Zones 2 and 3. We are pleased that the paragraph outlines the process involved when siting development within these flood zones.
25735	Environment Agency	This paragraph (Para 6.13) should also include reference to safe refuge. Safe refuge should be provided to any development within these zones (Flood Zones 2 and 3) to ensure they remain safe in times of flood from residual flood risk (i.e. from overtopping or breach).
25737	Environment Agency	In addition, the paragraph (6.13) also makes brief reference to SuDS. The paragraph should make clear that the use of infiltration SuDS may not be suitable at sites where contamination is present. Alternative SuDS features should be used in these circumstances.
25739	Environment Agency	The Ipswich Flood Defence Strategy (IFDMS) is referred to in Paragraph 6.15 and Paragraph 6.16. This section also outlines the work that began in 2008 to replace and raise the height of the floodgates in the Wet Dock lock. The Ipswich Tidal Defence Barrier is now operational and as such this should be specifically referenced.
25740	Environment Agency	The Ipswich Flood Defence Strategy (IFDMS) is referred to in Paragraph 6.15 and Paragraph 6.16. This section also outlines the work that began in 2008 to replace and raise the height of the floodgates in the Wet Dock lock. The Ipswich Tidal Defence Barrier is now operational and as such this should be specifically referenced.
25741	Environment Agency	We have also updated our coastal and estuary modelling in Ipswich. This includes the new barrier and it supersedes the modelling used in the SFRA and SPD. The

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

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

Other Organisations

The following comments were made in response to this issue:

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

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

Developers and Landowners

The following comments were made in response to this issue:

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

Parish and Town Councils

Members of the public

The following comments were made in response to this issue:

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

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

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

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

9. Chapter 7 – The Key Diagram

Representations	Comments	Object	Support
2	0	2	0

Other Organisations

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

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

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

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

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

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

10. Chapter 8 – The Spatial Strategy

The Ipswich Strategy Planning Area

Representations	Comments	Object	Support
4		3	1

Parish and Town Councils

The following comments were made in response to this issue:

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

Statutory Consultees

The following comments were made in response to this issue:

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

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

The following made no comments in response to this issue.

Other Organisations

Developers and Landowners

Members of the public

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

The land in Sproughton is outside the administrative boundary of Ipswich Borough Council and therefore cannot be managed through this Local Plan. The Council is

working with the other ISPA authorities, including transport modelling and mitigation, which will factor in the cumulative impact of developments inside and outside the Borough boundary on the local transport network.

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

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

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

11. ISPA1 - Scale and location of growth

Representations	Comments	Object	Support
5	0	4	1

Parish and Town Councils

The following comments were made in response to this issue:

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

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue.

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

		planned approach can deliver an extension to the built up area of Ipswich.
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The following made no comments in response to this issue.

Other Organisations

Members of the public

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

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

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

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

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

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

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

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

12. ISPA2 - Infrastructure

Representations	Comments	Object	Support
6	0	5	1

Statutory Consultees

The following comments were made in response to this issue:

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

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

Other Organisations

The following comments were made in response to this issue:

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

Members of the public

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils Developers and Landowners

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

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

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

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

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

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

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

13.ISPA 3 - Protection of the environment

Representations	Comments	Object	Support
9		5	4

Parish and Town Councils

The following comments were made in response to this issue:

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

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

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

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

Developers and Landowners

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Members of the public

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

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

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

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

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

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

14.ISPA4 - Delivering Development at the Borough Boundary

Representations	Comments	Object	Support
24		23	1

Statutory Consultees

The following made no comments in response to this issue.

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

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

Parish and Town Councils

The following comments were made in response to this issue:

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

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

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

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

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

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

The following comments were made in response to this issue:

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

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

Members of the public

The following comments were made in response to this issue:

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

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

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

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

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

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

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

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

The allocation in East Suffolk is in part designed to provide a green buffer to protect the villages in East Suffolk near this allocation as well as to provide 150 dwellings

indicatively. The Council recognises the need for a green trail (formerly the 'green rim') and the Government requirement to enhance biodiversity by 10% and this will be built into the master planning process.

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

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

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

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

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

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

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

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

15. CS1 – Sustainable Development

Representations	Comments	Object	Support
13	0	13	

Statutory Consultees

The following comments were made in response to this issue:

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

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

Other Organisations

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue:

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

Members of the public

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

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

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

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

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

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

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

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

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

In November 2018, the Met Office published updated climate change projections (the previous projections being UKCP09). The Met Office web site states that, 'The headline results in the latest set of climate projections are broadly consistent with UKCP09, although there are some differences (e.g. temperature and rainfall) that may be important for climate risk assessments.' The Local Plan should refer to the most up to date projections, for accuracy.

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

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

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

16. CS2 – The Location and Nature of Development

Representations	Comments	Object	Support
21	0	18	3

Parish and Town Councils

The following comments were made in response to this issue:

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

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25903	Environment Agency	We are pleased to see the inclusion of policy CS2 - The Location and Nature of Development. Point (g) of the policy should be strengthened include reference to blue corridors to state "dispersing open space based (non-commercial) leisure uses throughout the town with preferred linkages to ecological networks and/or green and blue corridors and protecting the countryside from inappropriate development".
26046	Historic England	The section on densities needs to be clarified. As stated above, high density does not necessarily mean high rise. What does high density mean for the town centre, Portman Quarter and Waterfront? The sentence could also with being broken down into smaller sentences because, as currently constructed, it could be read that the low density elsewhere is so that it does not compromise the heritage assets and the historic character of Ipswich but that this caveat does not apply in the town centre, Portman Quarter, Waterfront and IP-One area.
25703	Suffolk Chamber of Commerce	Suffolk Chamber supports the continued development of the Waterfront as a significant cultural and leisure hub and economic driver in the town. We support the Council's wish to regenerate and provide sustainable growth in this area alongside the Portman Quarter. Likewise, we support the development of the town's retail offer but welcome the focus on new office, hotel, culture and leisure developments in and around the town. As a caveat however, we would like to see further research on hotel use to ensure any new hotels will be occupied and not sat surplus to demand.
25971	Babergh Mid Suffolk District Council	Full opportunity and capacity to meet identified housing land needs should be explored. An amendment should be made to policy CS2 to acknowledge that local planning authorities within the Ipswich housing market area will plan to meet the needs of their own areas. The Babergh and Mid Suffolk Joint Local Plan housing numbers will be identified upon the publication of the national housing price affordability data schedule for March 2019.

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

Other Organisations

The following comments were made in response to this issue:

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

		centre are located within easy access of the town centre and a number of other communities regularly meet in or around the town centre at colleges & the university. To strengthen links/and understanding between different community groups, town centre infrastructure must take into account community cohesion.
26100	Suffolk Constabulary	To highlight the importance of designing out crime would be beneficial in this policy to ensure that careful consideration is made prior to locating new housing too close to other land uses such as retail or recreational facilities

Developers and Landowners

The following comments were made in response to this issue:

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

	England Co-Operative Society	
25914	Turley on behalf of Pigeon Investment Management Ltd	<p>The policy sets out that the central urban focus to the location of development also reflects the sequential approach to site selection required by the NPPF. However, Pigeon seriously dispute the Council's ability to deliver housing on many of the brownfield sites.</p> <p>Housing opportunities are limited and need to consider sites beyond the boundary. No further evidence as to how housing will be delivered later in the plan period.</p> <p>IBC should look to sustainable locations which have good infrastructure, high accessibility to settlements with employment opportunities and connectivity to Ipswich. E.G. neighbouring satellite villages and Felixstowe and A12 growth corridors.</p>
26054	Barton Willmore on behalf of Telereal Trillium Ltd	<p>Support part of policy which focuses residential development within walking distance of the town centre.</p> <p>Question the term 'medium' densities with respect to development in the rest of IP-One to maximise previously developed land. The Bibb Way Site (IP279) has been allocated for 104 dwellings across the entire site which only represents 40% of the site area. This is not maximise the use of previously developed land contrary to NPPF paragraph 123. A higher density with a mixture of houses and flats should be sought.</p>
25818	Cardinal Lofts (Mill) Ltd	<p>The Company offers its general support for the spatial strategy, as set out at paragraphs 6.10 to 6.22 and, in particular, the objective of focusing development in central Ipswich to tackle issues of deprivation and social exclusion.</p>
25819	Cardinal Lofts (Mill) Ltd	<p>Policy's main principles are supported. In particular, the Company again notes the focus that is being placed upon the IP-One Area, where high density development will be the norm.</p> <p>There is a potential conflict between criterion h of the policy and the 'objectives' (as set out at paragraph 6.8) and Policy DM12. The former (criterion h) requires that new development demonstrates 'very high quality architectural and urban design', whilst the latter (the 'objectives' and Policy DM12) both require a</p>

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

Members of the public

The following comments were made in response to this issue:

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

		<ul style="list-style-type: none"> - Loss of agricultural land; - No capacity for schools, libraries and health centre; and - Under provision of green space, parks and recreation
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How these comments have been taken into account in the Final Draft Local Plan:

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

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

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

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

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

The aim of the mixed-use requirement is to create sustainable, multi-functional neighbourhoods to enhance vitality and viability. Part of this is about creating ‘active frontages’ at street level, which car parking would not achieve. The development also needs to be safe for people within a flood risk area, which affects the types of development which may be suitable at ground level. The policy itself is not prescriptive about the type or proportion of mixed uses and therefore represents a flexible approach. An additional element of flexibility is proposed regarding mixed uses where neighbouring buildings already deliver diverse uses.

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

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

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

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

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

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

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

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

17. CS3 – IP-One Area Action Plan

Representations	Comments	Object	Support
4	0	4	0

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

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

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

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

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

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

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

18. CS4 – Protecting Our Assets

Representations	Comments	Object	Support
20		20	0

Statutory Consultees

The following comments were made in response to this issue:

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

25909	Environment Agency	Policy CS4 - Protecting our Assets outlines how the council will conserve and promote the enjoyment of the historic environment. point (d) should be further strengthened by amending the wording to "Supporting and securely funding the Greenways Project".
25911	Environment Agency	It is welcoming to see reference to the Water Framework Directive (WFD) in paragraph 8.71 however, detail is sparse. To improve the wording of this paragraph the Local Plan should identify the two key objectives of WFD: no deterioration of waterbodies and ultimately improving all waterbodies to good status by 2027. These objectives are key requirements of WFD. This could be further enhanced if the Local Plan included WFD baseline information on the local River Basin Management Plan (RBMP), specifically relating to the status of WFD waterbodies surrounding Ipswich Borough.
25913	Environment Agency	Water Framework Directive (WFD) in paragraph 8.71, it would be useful to highlight the number of waterbodies within the borough failing WFD 'ecological status or potential' and 'chemical status'. It is important to note that no development, either individually or cumulatively can cause deterioration in WFD status. All development should seek to enhance water quality reaching waterbodies in Ipswich by use of appropriate SuDS techniques that include pollution prevention and control measures.
26048	Historic England	In para 8.62 we would expect to see the term 'built, historic and natural assets' to be consistent. We welcome the commitment to a local list in the policy but would suggest that it is turned round '...the maintenance of a list of heritage assets of local importance, such as buildings or parks,....' to make it clear that it is not just buildings that can be included on the list. This should also be supported through the supporting text. agree that there the area between the Central and Wet Dock Conservation Areas should be reappraised and new boundaries considered.
25574	Marine Management Organisation	References to the "East Marine Plan" should be re-focused towards the "South East Marine Plan" or the UK Marine Policy Statement. The East Marine Plan should only be used in the

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

26008	Suffolk County Council	<p>Paragraph 8.71 refers to Anglian River Basin Management Plan and the WFD. To implement these, shallow open landscaped SuDS will be needed. These will impact on the design and masterplanning of sites as they often take up more space than envisaged. Requirements will need to be considered early in application preparation.</p> <p>Foxhall HWRC is within Suffolk Coastal. It is at capacity and development will add pressure. Plan to redevelop.</p> <p>Portman's Walk HWRC not capable of expansion/ remodelling. County project commenced to identify a new site.</p> <p>Support waste minimisation in this and other related policies. Could include "bring sites" as requirement.</p>
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Other Organisations

The following comments were made in response to this issue:

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

26101	Suffolk Constabulary	To highlight the importance of designing out crime it would be beneficial to clarify the need to consider security when conserving and enhancing heritage assets and ensuring that they are not left unoccupied and at risk of crime.
25617	Suffolk Wildlife Trust	We support the intention of this policy to protect the Borough's biodiversity, trees and soils. We recommend that paragraph 8.65 should include reference to the Conservation of Habitats and Species Regulations (2017). Also policy CS4 states that there are 20 County Wildlife Sites in the Borough, however paragraph 9.8.3 states that there are 19. This should be checked for consistency.

Developers and Landowners

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

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

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

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

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

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

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

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

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

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

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

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

There are 20 County Wildlife Sites in Ipswich not 19.

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

The RSBP have asked the Council to require provision of 'integrated nest boxes', rather than 'nest boxes'. Integrated nest boxes requires no ongoing maintenance and

repair and are preferable to other nest boxes. The Council are keen to protect the natural environment and the change reflects this commitment.

Natural beauty and special qualities' affords greater protection to the AONB in accordance with legislation.

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

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

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

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

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

19. CS5 – Improving Accessibility

Representations	Comments	Object	Support
8	0	7	1

Statutory Consultees

The following comments were made in response to this issue:

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

		We hope the Council continues to back our A14 campaign.
25990	Suffolk County Council	Joint Suffolk Health and Wellbeing Strategy - Outcome 2: Improving independent life for people with physical and learning disabilities: The Plan could set out a stronger framework for consideration of the accessibility of the built environment. Policy CS5 refers to accessibility in respect of transport but does not directly refer to the varying needs of the population as a whole apart from in supporting text (Paragraph 8.88). The Borough Council should consider moving this requirement into policy - to complement what is in DM12.

Other Organisations

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue:

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

Members of the public

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

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

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

The Council has an aspiration to make Ipswich a dementia-friendly town. Evidence has shown that good quality housing and well-planned, enabling local environments can have a substantial impact on the quality of life of someone living with dementia, helping them to live well for longer.’ Therefore, it is important that the Local Plan provides the framework to create inclusive and dementia-friendly environments.

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

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

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

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

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

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

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

20. CS6 – The Ipswich Policy Area

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

This is a deleted policy.

21. CS7 – The Amount of Housing Required

Representations	Comments	Object	Support
15	0	13	2

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25662	Northern Fringe Protection Group	The CS should comply with Government advice to use the Standard method annual 2014 (445) figures (Government October 2018 consultation) for housing targets. The evidence base ignores latest population

		<p>and employment figures. It fails to consider potential impacts for the Core Strategy of the drop of employed people from 67,300 to 66,500 in the latest NOMIS figures.</p> <p>The CS gives misleading impressions of continued population growth, when it is currently stagnant. The evidence base needs to consider the impacts of the latest population figure of 138,500 (2017) is the same as 2016, as the fall-off in population growth has implications.</p>
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Developers and Landowners

The following comments were made in response to this issue:

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

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

	behalf of Grainger PLC	<p>three years, ranging between 55-64% (based on the 2017 AMR) (refer to table 3 of this representation). Consequently, the Plan should be allowing a 20% buffer of land for housing to compensate for previous years of under delivery in line with paragraph 73 of the NPPF.</p> <p>The Borough's draft housing trajectory demonstrates that Ipswich cannot meet its current five-year housing land supply, let along the additional 20% buffer required to compensate for its failure to meet the Housing Delivery Test.</p>
25647	Turnberry Consulting on behalf of Grainger PLC	<p>This policy follows a stepped approach. Whilst a stepped approach to the annual housing requirement is an acceptable approach outlined in the NPPF, we believe in the case of Ipswich this approach is not justified and does not meet the outcomes specified within the guidance (see representation for guidance extract). The Borough's housing requirement has not significantly changed between emerging and previous policies, in fact it has decreased by 10 dwellings per annum. Given the Borough's significant under-delivery of housing over previous years alongside its decrease in housing need, the proposal to step the annual housing requirement is not justified.</p>
25648	Turnberry Consulting on behalf of Grainger PLC	<p>In order to be considered sound and compliant with National Policy, the emerging Plan should consider allocating more deliverable sites that will contribute to meeting the Borough's five year housing land supply plus an additional 20% buffer as outlined in Paragraph 73 of the NPPF. In short, the Borough must find more deliver sites to boost delivery in the early years of the Plan. If none can be found in the Town's boundaries, then it must work with adjoining authorities to find such sites within the greater urban area.</p>
25917	Turley on behalf of Pigeon Investment Management Limited	<p>There is no evidence of identifying housing needs across the IHMA and how IBCs neighbours are responding to the housing requirements of the Borough.</p> <p>No evidence as to how IBC will deal with the 1,090 home shortfall.</p> <p>The level of housing growth does not match the creation of new jobs proposed in CS13.</p>

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

The following made no comments in response to this issue.

Parish and Town Councils
Members of the public

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

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

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

The Planning Practice Guidance advises that in some circumstances it may be appropriate to consider whether actual housing need is higher than the standard method indicates. These circumstances may include where there are growth strategies for the area, for example where Housing Deals are in place, where strategic infrastructure improvements may increase demand for homes, or where unmet need is being taken from an adjoining local planning authority. These circumstances do not apply in Ipswich and consequently the housing need figure of 445 dwellings per annum (dpa) is incorporated into policy CS7.

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

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

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

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

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

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

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

22. CS8 – Housing Type and Tenure

Representations	Comments	Object	Support
9		8	1

Other Organisations

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue:

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

		was completed (May 2017), and updated (September 2017), prior to the formal introduction of the Annex 2 definition of affordable housing in 2018 and can therefore already be deemed 'out of date'."
26059	Barton Willmore on behalf of Telereal Trillium Ltd	Telereal considers that an increase in the density of the Site will help IBC to realise this policy. Telereal has considered IBC's Strategic Housing Market Assessment in proposals to develop Areas 2 and 3 of the Site. Paragraph 61 of the NPPF states that the size, type and tenure of housing should be assessed and provided for in planning policies. The increase in the density of the Site will allow Telereal to provide IBC with a mix of house types and sizes, including a percentage of affordable housing.

Members of the public

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils Statutory Consultees

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

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

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

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

The requirement for all housing schemes of 50 or more dwellings to provide 10% of plots for self or custom build has been deleted. Replacement wording stating the Council will consider the Self Build Register and whether provision of self-build plots should be included within major developments has been inserted. This is to ensure that the policy requirement to provide self-build plots is reasonable and justified.

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

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

23. CS9 – Previously Developed Land

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This is a deleted policy.

24. CS10 – Ipswich Garden Suburb

Representations	Comments	Object	Support
17	0	13	4

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25610	Westerfield Parish Council	Westerfield Parish Council has noted the contents of Core Strategy 10 and continue to be concerned over the amount housing being proposed and its effect on the village of Westerfield.

25717	Westerfield Parish Council	The parish Council are pleased that Core Strategy 10 continues to include a commitment to the Ipswich Garden Suburb Supplementary Planning Document and also the appropriate separation of the "built areas" of the Ipswich Garden Suburb from the village of Westerfield.
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Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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26135	Ipswich and East Suffolk Clinical Commissioning Group	NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Mitigation for the increase in patients from the proposed Ipswich Garden Suburb will be spread between Two Rivers Medical Practice and the new healthcare facility at Tooks. NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. The impact of the development and increase in patients will be mitigated by options currently being explored.
25652	Northern Fringe Protection Group	Some form of northern relief road is clearly required and along with improvements to over-capacity junctions such as Henley Road/ Valley Road and needs to be included in the Infrastructure Tables and delivered for full development of the Ipswich Garden Suburb to be allowed.
25654	Northern Fringe Protection Group	The traffic modelling and air quality assessments for the first phases of the IGS assumed that the Upper Orwell Crossings (TUOC) would proceed and needs to be reviewed to reflect the cancellation of this project. The Planning Inspector was incorrectly advised that full funding was in place for the Crossings and they would proceed.
25657	Northern Fringe Protection Group	The potential impacts of Sizewell C on the IGS and the CS have still not properly been assessed. Concerns regarding the impact of increased rail freight for Sizewell C on the Ipswich-Westerfield line in terms of air pollution, noise, operation of the level crossing and proposed pedestrian bridge.
25660	Northern Fringe Protection Group	There are still no firm proposals for new sewage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. There remains a lack of understanding and detail on what new additional sewage infrastructure will be required or evidence that sewage infrastructure required for the IGS can be delivered.

		The figure of 13,550 dwellings between 2011 and 2031 is an error that should be corrected.
25728	Sports England	Sport England are broadly supportive of this policy but have concerns regarding the reference to 'dual use playing fields'. It is considered that the policy requirement for outdoor sport should not include school playing fields, as these are not always made available for public use, and over use can affect their quality. The requirement for replacement playing fields for Ipswich School must be in addition to the policy requirements for community outdoor sport provision.

Developers and Landowners

The following comments were made in response to this issue:

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

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

Members of the public

The following comments were made in response to this issue:

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

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

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

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

inclusion of local facilities and services within the site to serve the day-to-day needs of the residents.

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

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

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

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

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

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

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

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

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

25. CS11 – Gypsy and Traveller Accommodation

Representations	Comments	Object	Support
4	0	3	1

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners
Members of the public

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

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

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

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

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

26. CS12- Affordable Housing

Representations	Comments	Object	Support
8	0	6	2

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

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

		<p>where a Council is proposing 15% affordable housing then the 10% falls entirely within that. Policy CS12 is contrary to paragraph 64 and footnote 29 of the NPPF.</p> <p>The Council is asking that "at least 15%" affordable housing should be provided on major development sites. No justification as to why "at least" is used. This is a huge "developer cost" so why is there no mandatory level of affordable housing in the Local Plan as per other Local Plans?</p>
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Developers and Landowners

The following comments were made in response to this issue:

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

		affordable housing that can be provided (on viability grounds).
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Members of the public

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

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

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

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

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

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

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

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

27. CS13 – Planning for Jobs Growth

Representations	Comments	Object	Support
6	0	5	1

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25663	Northern Fringe Protection Group	The evidence base ignores latest population and employment figures. It fails to consider the potential impacts of the drop of employment people from 67,300 to 66,500 in the latest NOMIS figures. Evidence clearly demonstrates that Ipswich employment is considerably exposed to macro-economic events and that it is far too simplistic and incorrect to assume steady

		<p>straight-line jobs growth, which is more removed from reality. Refinement of the employment modelling is required. The jobs creation numbers are not realistic. “Jobs” needs to be defined and “encourage” changed to “aims to deliver”.</p> <p>Paragraph 41 of the Topic Paper is incorrect.</p>
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Developers and Landowners

The following comments were made in response to this issue:

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

		Evidence Base. If not, the Local Plan cannot be found sound. In order to achieve soundness, we recommend the proposed allocations are reviewed to reduce the amount of land that is allocated. We recommend that the amount of land identified for allocation in the Plan is reduced under Policy CS13 and the supporting paragraphs.
25690	Boyer on behalf of East of England Co-Operative Society	Boss Hall Business Park is safeguarded for employment and ancillary uses (Policy DM33). The safeguarding of this site is supported, provided it is not restricted to B-Class employment uses (see further comments on Policy DM33). It is noted that Policy CS13, criterion c, recognises other employment-generating uses to include, inter alia, leisure and retail, and this is supported.

The following made no comments in response to this issue.

Parish and Town Councils
Members of the public

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

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

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

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

The employment forecasts and employment land supply have been refined. The 2017 East of England Forecasting Model (EEFM) shows that the jobs delivery for Ipswich equates to approximately 9,500 jobs. As this represents approximately a 40% decrease compared to the 2016 EEFM data it was considered appropriate to elect for the updated evidence base. The differences between the 2016 EEFM and 2017 EEFM and the selection of a dataset will be explored as part of a separate strand of work to support the Local Plan. In terms of employment land supply, this has been lowered from approximately 32ha to just over 28ha. The majority of this reduction was arrived at due to the commencement of the permission at IP147 which represented just under 5ha of employment land and the addition of 1ha through the

change of IP029 from residential to employment. The reduced figure of 28ha is still approximately 5ha greater than the baseline minimum set out in the Economic Sector Needs Assessment (2018) of roughly 23ha. This higher figure of 28ha is necessary to ensure there is a range and choice of sites across the Borough and the plan period. For example, the land at IP141a(1) is the highest, undeveloped, employment site in the Borough and it's important that sites such as this are available to potential occupants for development.

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

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

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

28. CS14 – Retail Development and Main Town Centre Uses

Representations	Comments	Object	Support
5	0	4	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25704	Suffolk Chamber of Commerce	Suffolk Chamber supports the continued development of the Waterfront as a significant cultural and leisure hub and economic driver in the town. We support the Council's wish to regenerate and provide sustainable growth in this area alongside the Portman Quarter. Likewise, we support the development of the town's retail offer but welcome the focus on new office, hotel, culture and leisure developments in and around the town. As a caveat however, we would like to see further research on hotel use to ensure any new

		hotels will be occupied and not sat surplus to demand.
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Other Organisations

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

An additional sentence explaining the need to consider CCTV has been included in the reasoned justification. This is in response to feedback from Suffolk Constabulary and has been included to ensure that environmental enhancements and urban greening projects are mindful of CCTV, in the interests of public safety.

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

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

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

29. CS15 – Education Provision

Representations	Comments	Object	Support
5	0	4	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25593	Department for Education (DfE)	The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure, not least schools, in policy CS15, including references to ensuring infrastructure provision meets needs, timely delivery of infrastructure alongside development and requirements for developer contributions.
25595	Department for Education (DfE)	Key national policies should be explicitly referenced or signposted within the document.

		<p>In particular: Paragraph 94 of the NPPF. The DfE supports the principle of Ipswich Borough Council safeguarding land for new schools. Where new schools are developed, land for any future expansion of new schools should be safeguarded. The Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011).</p>
25597	Department for Education (DfE)	<p>A good example is an approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD, 2016). The DPD provides policy direction, establishes the Council's approach to providing primary and secondary school places and helps identify suitable sites. The DPD may provide useful guidance with respect to an evidence-based approach to planning or new schools in the emerging Ipswich Local Plan, securing site allocations for schools and providing example policies to aid delivery through development management policies.</p>
25598	Department for Education (DfE)	<p>Ensuring there is an adequate supply of sites for schools is essential and will ensure that Ipswich borough council can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.</p>
26003	Suffolk County Council	<p>See appendix 5 for detailed comments. In summary it's estimated:</p> <ul style="list-style-type: none"> - Three new primary schools required at Ipswich Garden Suburb, and a secondary school. - A new primary school on Carr Street (IP048a) - The County needs to consider whether to expand existing schools or deliver a new primary school in the south-west. - Land required to enable the expansion of Rose Hill Primary School (IP10a). <p>Envisaged that school place capacity could be provided to serve growth but would need to be reassessed based on actual quantum of growth. The County working to consider longer term needs for post-16 education.</p>

The following made no comments in response to this issue.

Other Organisations

Developers and Landowners

Members of the public

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

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

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

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

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

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

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

The reference to Travel Ipswich has been deleted as this is no longer active. In its place, a general comment regarding the mitigation of traffic impacts on congestion and

air quality in relation to sustainable travel to educational establishments has been included.

30. CS16 – Green Infrastructure, Sport and Recreation

Representations	Comments	Object	Support
17	0	10	7

Parish and Town Councils

The following comments were made in response to this issue:

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

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25921	Environment Agency	Policy CS16 - Green Infrastructure, Sport and Recreation. Paragraph 8.189 refers to Natural Flood Management. The wording of this paragraph could be further enhanced by incorporating reference to reducing flooding by working with natural process, reconnecting watercourses with flood plains to enhance flood storage in times of need and taking opportunities to restore watercourses to a naturalised state. This should be considered and incorporated into developments whenever opportunities arise. Such measures can provide benefits in terms of biodiversity, amenity, health and wellbeing and should be incorporated into the scheme design from the outset.

25922	Environment Agency	We are pleased to see the inclusion of Policy CS16 - Green Infrastructure, Sport and Recreation. We welcome that paragraph 8.189 also suggests low lying areas are identified for flood storage. It could be good to include this within the SFRA.
25928	Environment Agency	EA suggests inclusion of a section of text on "blue corridors". Blue corridors involve setting back urban development from watercourses, overland flow paths and ponding areas creating a mosaic of urban corridors designed to facilitate natural hydrological processes whilst minimising urban flooding, enhancing biodiversity and improving recreation. The recreation activities normally relate to walk or cycle routes alongside the River. IBC have tried to establish public access along the urban river Gipping to allow canoe and kayak access as part of voluntary agreements. The policy/plan could be enhanced by including reference to maintaining public access to the water itself.
25934	Environment Agency	<p>The following site allocations have been identified as potentially important to the feasibility of establishing public access along the urban river Gipping to allow canoe and kayak access to the river Gipping:</p> <ul style="list-style-type: none"> * IP003 * IP015 * IP031 * IP037 * IP047 * IP083 * IP105 * IP119 * IP120b * IP132 * IP136 * IP147 * IP149 * IP188 * IP346 <p>Consideration should be made when developing these sites to ensure that this promotes public access to the River Gipping.</p>
26070	Suffolk Coastal and Waveney District Councils	The Council supports and welcomes the approach of working with partners in respect of the Recreational Avoidance and Mitigation Strategy and a new country park within the Ipswich Garden Suburb. Both of the aforementioned aspects of this policy are reflective of the joint work being undertaken between the Council and IBC. The Council also supports joint working with IBC and other neighbouring authorities to deliver strategic green infrastructure. In particular the establishment of a green rim around Ipswich is reflected in Policy SCLP12.24 'Land at

		Humber Doucy Lane' in the Suffolk Coastal Final Draft Local Plan.
25988	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 1: Every Child in Suffolk has the best start in life</p> <p>As set out in this letter, our authorities will work together to ensure that sufficient choice of school and pre-school places are provided to meet demands arising from development. The Plan also promotes safe and sustainable travel, and access to green space. Policies CS16 and DM6 are key in this regard, with the Public Open Space SPD setting standards in respect of formal and informal recreation and play - which are key in a child's development.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25572	Ipswich Canoe Club	<p>This part of the Plan is focused on land-based recreational/ sports facilities (nothing water/ river based). Recommended to include more statement of vision based around ongoing engagement with relevant local people and groups to achieve better recreational, leisure and economic use of the Rivers.</p> <p>River portages, facilities and parking could be better to encourage more use.</p> <p>Better flow of the river Gipping would reduce weed on the river, requiring co-ordination with Environment Agency.</p> <p>Better access between the Orwell and Gipping.</p> <p>Support local community projects.</p> <p>Vision could be more imaginative (e.g. Norwich, Cambridge or Upper Thames?).</p>
25672	Northern Fringe Protection Group	The proposed allocation of land for housing at the northern end of Humber Doucy Lane is in breach of this policy.
25775	RSPB	Support the intention to enhance biodiversity, the commitment to partnership working and extending the ecological network. Consistent with national policy.
25875	Save our Country Spaces	The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of policy CS16.

25729	Sports England	Sport England supports this policy, in particular the reference to the need to protect, enhance or extend existing open spaces and sport and recreation facilities. We also support the reference to improving access to existing facilities where appropriate.
26105	Suffolk Constabulary	To highlight the importance of designing out crime the following clause should be added: 'k. working with local police and community partners to ensure that all opportunities to design out crime have been taken prior to the commencement of any project and as part of the on-going management of any open spaces, sport or recreational facilities.'
25618	Suffolk Wildlife Trust	We support the intentions of this policy to enhance and extend the ecological networks and green corridors in the Borough, including through requiring new open space to include enhancements for biodiversity.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26073	CBRE	Policy CS16 includes proposed amendments recognising the relationship of green infrastructure and RAMS. The Policy should further recognise the role of the IGS Country Park as an element of an overall mitigation strategy, and the cross-boundary relationships which exist under ISPA3. A comprehensive, rather than compartmentalised approach to mitigation is required and should be reflected in Policy.
26081	Mersea Homes Limited	Policy CS16 includes proposed amendments recognising the relationship of green infrastructure and RAMS. The Policy should further recognise the role of the IGS Country Park as an element of an overall mitigation strategy, and the cross-boundary relationships which exist under ISPA3. A comprehensive, rather than compartmentalised approach to mitigation is required and should be reflected in Policy.
25822	Cardinal Lofts (Mill) Ltd	Whilst the Company generally support the objectives of this policy, it considers that there should be explicit recognition that, on high

		density sites within the IP-One Area, and particularly along the Waterfront, it will not be possible to make full provision for private, and public, open space, in accordance with the Council's standards. Open space is a very 'land hungry' use and, if developments have to meet full standards, densities will be greatly reduced. This could threaten the achievement of the Council's spatial strategy and result in new development not making the best, and most effective, use of previously-developed sites.
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The following made no comments in response to this issue.

Members of the public

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

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

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

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

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

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

The proposed allocation of Humber Doucy Lane for future development is not considered to breach Policy CS16. The land was designated as Countryside and therefore the provisions of Policy DM11 will apply. The need to include the green rim

is acknowledged in Policy ISPA4. The master planning will need to factor in the inclusion of Green Corridor (D) in accordance with the requirements of Policy DM10, as well as accord with the biodiversity needs of Policy DM8. Consequently, the proposed allocation of this land for potential development is acceptable in principle but will need to comply with the relevant Development Management Policies.

An additional clause (k) regarding designing out crime has been included in the policy following the request from Suffolk Constabulary. This has been inserted as a means of highlighting the importance of designing out crime which is critical to the effective delivery of green infrastructure and public safety but needs to be appropriate to the context.

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

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

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

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

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

31. CS17 – Delivering Infrastructure

Representations	Comments	Object	Support
13	0	10	3

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25707	Anglian Water	Policy CS17 should refer to both the use of conditions where appropriate as well as

		planning obligations in relation to the provision of infrastructure.
25594	Department for Education (DfE)	The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure, not least schools, in policy CS17, including references to ensuring infrastructure provision meets needs, timely delivery of infrastructure alongside development and requirements for developer contributions.
25608	Department for Education (DfE)	<p>One of the tests of soundness is if the Local Plan is 'effective'. In this context there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school place required to meet increase in demand. The DfE supports the approach to ensuring developer contributions address the impacts from growth.</p> <p>The council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement. The statement should identify the anticipated S106 funding towards infrastructure arising from the need for school places. It should be reviewed annually.</p>
25936	Environment Agency	Policy CS17 - Delivering Infrastructure. The policy refers to the Community Infrastructure Levy (CIL) and outlines the types of infrastructure that can be secured or financed from new developments. This includes, but is not limited to, Environment and Conservation as well as Sport and Recreation. Norwich Railway line sluice on the River Gipping had its gates removed a number of years ago. The concrete structure remains and requires removal. This policy could be used to help fund the structures removal to ensure public access to the river and provide environmental improvements as outlined in our response to policy CS16.
25939	Environment Agency	Paragraph 8.198 refers to appendix 4 which lists the types of infrastructure referred to within Policy CS17. We would expect to see wastewater/sewerage infrastructure listed in the utilities section because it is likely that some improvements will be required in order to enable or facilitate growth. The bullet point

		names "water" could be further expanded to say "water - potable and wastewater supply".
25940	Environment Agency	Paragraph 8.199 highlights the pressure that growth and development put on existing infrastructure and correctly identifies that there will be a need to upgrade existing infrastructure within the borough. This paragraph could be strengthened to reflect the need to ensure growth and development is phased in line with these upgrades to infrastructure, particularly water utilities infrastructure.
25709	Suffolk Chamber of Commerce	Approve of the aim of this policy. Support the introduction of innovative transport and parking solutions to tackle congestion, as well as a simpler and cost-effective park and ride scheme, better bus services, more electric vehicle charging points and cycle route improvements. Support proposals that create better links between the retail centre and both the railway station and the waterfront. There is an urgent need for the provision of a taxi-rank on the Waterfront. We would like to see the case for this made in the Local Plan. We hope the Council continues to back our A14 campaign.
25973	Babergh Mid Suffolk District Council	The Councils would express support for the approach to the Recreational Avoidance and Mitigation Strategy referred to in policy CS17 and paragraphs 8.21 and 8.202.
25977	Suffolk County Council	CIL is complex, but it's clear that a significant amount of the infrastructure is to mitigate cumulative impacts. Government indicated that it may abolish restrictions on pooling of planning obligations. If not, then challenging without CIL. Council should consider CIL. Site-specific transport measures best delivered through S106 and S278 agreements. An approach to delivering sustainable transport measures must be agreed. Additional demands on local libraries which are community hubs. Developer contributions needed to mitigate impacts of growth but requiring obligations will be challenging in context of proposed relaxation of obligations. County will prepare list of library improvements. Include in IDP.

Other Organisations

The following comments were made in response to this issue:

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

25619	Suffolk Wildlife Trust	We support the inclusion of strategic green infrastructure and the Recreational Disturbance Mitigation Strategy in this policy.
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The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

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

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

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

The Council is not currently progressing Community Infrastructure Levy.

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

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

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

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

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

32. CS18 – Strategic Flood Defence

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

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

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

33. CS19 – Provision of Health Services

Representations	Comments	Object	Support
4	0	4	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25798	East Suffolk and North Essex NHS Foundation	The policy wording requires ESNEFT, the statutory health authority and provider to demonstrate to the Council that development

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

		those schemes for new bespoke medical facilities where such facilities are agreed to in writing by the commissioner. New facilities will only be appropriate where they accord with the latest up to-date NHS England and CCG strategy documents and are subject to The CCGs prioritisation and approval process. It is vital that our infrastructure is serviced by adequate public transport systems and communication infrastructure.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

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

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

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

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

34. CS20 – Key Transport Proposals

Representations	Comments	Object	Support
7	0	6	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25710	Suffolk Chamber of Commerce	Approve of the aim of this policy. Support the introduction of innovative transport and parking solutions to tackle congestion, as well as a simpler and cost-effective park and ride

		<p>scheme, better bus services, more electric vehicle charging points and cycle route improvements.</p> <p>Support proposals that create better links between the retail centre and both the railway station and the waterfront. There is an urgent need for the provision of a taxi-rank on the Waterfront. We would like to see the case for this made in the Local Plan.</p> <p>We hope the Council continues to back our A14 campaign.</p>
26017	Suffolk County Council	<p>The objectives set out in this Policy are broadly appropriate, but our authorities need to carry out further work on the deliverability of these measures in order to incorporate them into an Infrastructure Delivery Plan.</p> <p>The supporting text requires further consideration. Delivery of additional east-west capacity, in order to consider the sort of measures referred to in the 2007 Buchanan report (referred to in 8.221), is not currently programmed. Paragraph 8.223 should be updated to reflect the cancellation of the Upper Orwell Crossings project. Accordingly, the Borough Council should consider the re-wording of Objective 6 of the Plan, accordingly.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25883	Associated British Ports	<p>ABP will continue to assist the Council in developing a feasible solution for east-west transport capacity and for all modes access to the Island site. Also supports the efforts to progress the Ipswich Northern Route Study.</p> <p>ABP's support for access improvements in and around the Waterfront and onto the Island Site is conditional upon there being no operational impact on the Port. Must secure a development solution which addresses all port safety, security and operational issues, avoids any adverse impact on port and marine operations, and accommodates the existing businesses.</p> <p>Support efforts to lobby for improvements to A14 and A12(s).</p>

26132	Ipswich and East Suffolk Clinical Commissioning Group	We support the policy relating to sustainable transport infrastructure linking new and existing communities. We would support development planning that promotes the use of public transport, walking and cycling.
25653	Northern Fringe Protection Group	The Transport modelling fails to identify when these Ipswich junctions will reach capacity and consequently the Core Strategy fails to plan for this.
25655	Northern Fringe Protection Group	Northgate Street / Old Foundry Road junction has a V/C of 115% in the PM peak, which will mean that traffic will be backed up to the Upper Brook Street/ Tacket Street junction therefore blocking buses out of the Old Cattle Market bus station and buses heading into Tower Ramparts bus station. This will make the counter-flow cycle lanes unusable. IBC needs to identify when capacity will be reached and plan for new infrastructure to ensure the required levels of sustainable bus travel are delivered to ensure a reliable service, otherwise modal shift assumptions need to be revised downwards.
25674	Northern Fringe Protection Group	This chapter and the wider CS need to be updated to take account of the decision to cancel TUOC. It is not clear whether the traffic modelling assesses the impact of the potential construction of Sizewell C. Some form of northern relief road is required in order to implement the CS in a sound and effective manner as evidenced in the WSP reports. Model runs 2 and 6 should be provided as part of the consultation process to assess the revised CS. Some Ipswich junctions that are over-capacity have been omitted from the main report. 8.220 needs amending to "will".

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners
Members of the public

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

The preferred options version of policy CS20 overlapped with policy ISPA2 and therefore it could create confusion. The proposed amendments clarify that policy CS20 is the Ipswich-specific transport infrastructure needed to deliver the Local Plan growth. It links to Suffolk County Council's Transport Mitigation Strategy which identifies measures for the whole ISPA area that are essential to delivering growth in Ipswich and in neighbouring authorities. These will be worked up into a more detailed action plan and costed through the Ipswich Strategic Planning Area Board. In the meantime, very broad estimates have been incorporated into the list of infrastructure requirements at Table 8A in chapter 10 of the Core Strategy Review.

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

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

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

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

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

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

35. Chapter 9 – Development Management Policies

Representations	Comments	Object	Support
4	0		1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25715	Suffolk Chamber of Commerce	Suffolk Chamber of Commerce believes planning processes and decisions should be supportive of private sector investment and job creation and where possible, new developments should be sustainable, in keeping with the local character and environmentally friendly for future generations.

		Suffolk Chamber of Commerce and more importantly, our Greater Ipswich board will continue to work closely with Ipswich Borough Council, to ensure that the business voice is heard in planning and development discussions surrounding the towns future. We look forward to seeing how the above comments and recommendations fit in the with the Local Plan moving forward.
25986	Suffolk County Council	Suffolk Fire & Rescue Service (SFRS) has considered the draft Plan and considers that, given the level of growth proposed, it is not envisaged that additional service provision will need to be made in order to mitigate any additional demand from growth. However, this will be reconsidered if service conditions change during the plan period. Many elements of fire safety are considered through the Building Regulations. As such, SFRS does not expect the Plan to implement specific policies for promotion of fire safety but would appreciate any steps that the Borough Council can take. E.g. sprinkler systems in new developments.

Other Organisations

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Developers and Landowners

Members of the public

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

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

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

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

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

36. DM1 – Sustainable Construction

Representations	Comments	Object	Support
8	0	6	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25688	Anglian Water	Anglian Water supports the inclusion of the optional higher water efficiency standard in the Local Plan Review. We also support the cross reference to the requirements of Policy DM4 relating to the provision of SuDS and water efficiency measures.
25941	Environment Agency	We welcome the inclusion of policy DM1 - Sustainable Construction. We fully support paragraph 9.1.5 which states the East Anglian area is identified as an area of severe water stress and that lowering water demand is identified as one of a range of measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. We are pleased to see inclusion of requiring residential development being required to meet water efficiency standards of 110 litres of water per person per day.
25942	Environment Agency	DM1 - Sustainable Construction. The policy should further make clear that the use of infiltration SuDS, may not be suitable at some sites where contamination is present. Alternative SuDS features should be used in those circumstances.

26049	Historic England	Should clarify whether new development includes extensions to historic buildings. Helpful if supporting text states that when considering sustainable construction and heritage assets that care should be taken to consider both the planning and building regulation implications of proposed interventions in a building. Note that some heritage assets are exempted from compliance requirement with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance and that there are special considerations for others such as those of a traditional construction method which will perform differently. However, many heritage assets draw on locally sourced building materials.
26009	Suffolk County Council	DM1 should be amended for clarity, as follows. "Surface water should be managed as close to its source as possible. This will mean the use of Sustainable Urban Drainage systems, including measures such as soakaways, permeable paving and green roofs. green or blue roofs, soakaways and permeable paving."

Developers and Landowners

The following comments were made in response to this issue:

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

		<p>deliverable in a viability sense. The expectation of green and/or blue roofs is not justified and does not appear to have been subject to viability testing.</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

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

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

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

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

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

37.DM2 – Decentralised Renewable or Low Carbon Energy

Representations	Comments	Object	Support
3	0	3	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26075	CBRE	Policy DM1 remains onerous and fails to adhere to the requirements of paragraph 16(b) of the NPPF (2019) and is made less so by the amendments proposed which establishes a compound test rather than an either/or test. The Council's justification and evidence to support the change is awaited.
26083	Mersea Homes	Policy DM1 remains onerous and fails to adhere to the requirements of paragraph 16(b) of the NPPF (2019) and is made less so by the amendments proposed which establishes a compound test rather than an either/or test. The Council's justification and evidence to support the change is awaited.
25897	Montagu Evans on behalf of SSE Generation Development Ltd	SSE requests that a clearer policy relating to the wind energy development - including re-powering and extension - is established in the Local Plan and requests that changes are made to better support future investment in renewable wind energy developments. This can be achieved by: <ul style="list-style-type: none"> - Specific reference to support for re-powering existing windfarm locations; - Identifying existing windfarm locations in the Core Strategy; - Including reference to the acceptance of windfarm developments; and - The provision for and policy support for offshore grid connection, including grid cabling, associated substations and ancillary equipment.

The following made no comments in response to this issue.

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

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

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

The council acknowledge that onshore wind turbines form an essential part of the UK's renewable energy mix. However, Ipswich is a tightly bounded urban authority, with large areas of below ground archaeology and sensitive wildlife populations and habitats and is not an obvious location for wind energy development. The Council are however supportive of zero and low carbon energy systems where they do not have an adverse impact which cannot be mitigated. The supporting text of DM2 has been amended to reflect this.

38.DM3 – Air Quality

Representations	Comments	Object	Support
11	0	10	1

Parish and Town Councils

The following comments were made in response to this issue.

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

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25758	Natural England	<p>Natural England expects the plan to address the impacts of air quality on the natural environment. It should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs.</p> <p>One of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.</p>
25759	Natural England	<p>The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites, and the impacts on vulnerable sites from air quality effects on the wider road network should be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. The designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.</p>
26018	Suffolk County Council	<p>The County recognises that it has a role to play in managing poor air quality in Ipswich. In order to more effectively consider the relationship between vehicular movements arising from development and air quality, it may be appropriate to align the thresholds for Air Quality Assessment with the thresholds for Transport Assessment; i.e. 80 dwellings; or provide the rationale for the figure.</p> <p>Maximising opportunities for healthy and sustainable travel will be fundamental for managing air quality issues in Ipswich. The Council could helpfully refer to specialist housing, e.g. care homes, as being a sensitive receptor (as noted in the policy).</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25658	Northern Fringe Protection Group	There is no Air Quality Assessment provided as part of this consultation. This needs to be completed urgently and needs to include

		assessments for the early years of planned developments, all construction-related traffic (including sewage infrastructure projects) and rail traffic.
25681	Northern Fringe Protection Group	<p>IBC is not doing enough to tackle the issue of air quality and must do more. Objective 11 of the current Local Plan should not be removed. The additional congestion from traffic modelling will worsen air quality and this is illegal and therefore would render the CS unsound.</p> <p>The CS needs to comply with paragraph 181 of the NPPF and make a clear commitment to improving air quality in Ipswich and the compliance with legally binding air pollution targets.</p> <p>Concerns and questions raised in relation to the Air Quality Topic Paper, AQMA and rail assessment.</p>
26142	Northern Fringe Protection Group	IBC is already in breach of guidelines and requirements when assessing the impacts of development on air quality and needs to alter its practices to comply with the Core Strategy.
25857	Ravenswood Environmental Group	<p>The air quality policy would prevent development at Ravenswood because existing peak hour traffic is so great that this would be an Air Quality Management Area had the Borough Council conducted appropriate monitoring at the Nacton Road roundabout.</p> <p>The development at Ravenswood on all of the 6 development sites adds intolerably to air quality concerns without a solution in the Local Plan.</p>
25864	Save our Country Spaces	<p>This plan fails both soundness and legal compliance specifically on environmental health impacts from likely congestion and attendant air quality impacts and pollution. Air pollution deaths are double previous estimates finds research. Ipswich is failing to address air pollution and it's AQAP is inadequate. The SCDC proposals will exacerbate this critical problem. Dust and noise impacts are inadequately assessed and not subject to robust health impact assessments required by NICE etc.</p> <p>IBC are playing "fast and loose" on public consultation on their draft AQAP. The AQAP is not fit for purpose and is unlawful. Concerned over lack of monitoring.</p>

25873	Save our Country Spaces	This plan fails both soundness and legal compliance specifically on environmental health impacts from likely congestion and attendant air quality impacts and pollution. Air pollution deaths are double previous estimates finds research. Ipswich is failing to address air pollution and it's AQAP is inadequate. The SCDC proposals will exacerbate this critical problem. Dust and noise impacts are inadequately assessed and not subject to robust health impact assessments required by NICE etc. IBC are playing "fast and loose" on public consultation on their draft AQAP. The AQAP is not fit for purpose and is unlawful. Concerned over lack of monitoring.
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Members of the public

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Developers and Landowners

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

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

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

The current modelling outputs have been used for an Air Quality screening exercise to inform the extents of the required air quality modelling. The air quality modelling

will be undertaken once the output from the updated transport model is completed for inclusion in the local plan submission by the end of March 2020.

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

39.DM4 – Development and Flood Risk

Representations	Comments	Object	Support
7	0	7	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25693	Anglian Water	Generally supportive of policy although we suggest that the policy be amended to include a positive reference to the provision of SuDS, with connections to public sewer being last resort and specific reference to the risk of sewer flooding.
25943	Environment Agency	Policy DM4 - Development and Flood Risk. The SFRA is again mentioned here and needs to be updated to remain useful. Paragraph 9.43 refers to the suitability of different types of developments within the various flood zone classifications. It should be noted that the Flood Zones will have changed and the outline of Flood Zone 3b may need to be updated. Plan 2 - Flood Risk, dated November 2018 maps the flood zone. This is different to our current flood maps. Our flood map for planning was updated on 31 January 2019.
25944	Environment Agency	Paragraph 9.44 refers to the Ipswich Level 2 SFRA providing the necessary information to help facilitate the sequential approach as outlined in the NPPF demonstrating the application of the sequential test is essential. We are currently reviewing the Sequential and Exception Test statement and will advise of any further work required.
25945	Environment Agency	We are pleased to see that paragraph 9.4.9 requires the production of site specific FRAs to

		include detailed flood modelling to ascertain flood risk. However, the paragraph also refers to the SFRA. As previously stated, you may wish to update your SFRA because there is new ENS (Essex Norfolk and Suffolk) Coastal Modelling 2018, to which site specific Flood Risk Assessments would have to refer to in line with paragraph 160 of the NPPF.
25946	Environment Agency	Paragraph 9.4.10 states that “FRAs for proposals in Zones 2 and 3 need to clearly state the frequency of flooding in and around the site and, until the EA’s flood defence barrier is implemented, will need to assume existing defences are in place”. This sentence is now no longer fully applicable as the tidal barrier is now complete and operational and should be updated accordingly. The paragraph should also consider residual risk.
25763	Natural England	We recommend that Policy DM4 includes a requirement for proposals to demonstrate that the method of surface water disposal will not have any adverse effect on European and nationally designated sites.
26010	Suffolk County Council	Clarify that part b) means the countywide flood risk guidance as source of 'adopted standards'. Also clarify that 'wherever practicable' point refers to the application of SuDS standards, rather than the requirement to ensure adequate protection from flood risk. Support intent of clause (d) and keen to support measures which encourage water efficiency, but unclear how this criteria is intended to operate alongside the requirement in DM1. A discussion on the best policy mechanism for encouraging re-use of land drainage water recommended. Amend paragraph 9.4.8 to explain linkage between Plan, SPD and countywide guidance rather than paragraph 8.41.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

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

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

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

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

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

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

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

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

It is acknowledged that Suffolk County Council have asked how criterion d regarding water efficiency operates alongside the requirement in Policy DM1 for dwellings to

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

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

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

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

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

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

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

		the mitigation hierarchy to avoid, mitigate or compensate the impact.
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Other Organisations

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

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

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

accepted that the relevance of addressing the mitigation hierarchy in relation to all development is not clear in policy DM8 and, therefore, it is proposed to move the relevant text to the introductory paragraph of DM8.

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

Representations	Comments	Object	Support
7	0	5	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25762	Natural England	Support this policy. Recommends that large developments include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site. The Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards. Recommend six features for provision.
25989	Suffolk County Council	Joint Suffolk Health and Wellbeing Strategy - Outcome 1: Every Child in Suffolk has the best start in life. As set out in this letter, our authorities will work together to ensure that sufficient choice of school and pre-school places are provided to meet demands arising from development. The Plan also promotes safe and sustainable travel, and access to green space. Policies CS16 and DM6 are key in this regard, with the Public Open Space SPD setting standards in respect of formal and informal recreation and play – which are key in a child's development.
26011	Suffolk County Council	Supporting text on open space proportions (paragraph 9.6.2) suggests specific proportions of sites for green space and notes that this space can contribute to part of a site's SuDS provision. This is helpful but it should be noted that, on some sites, 10% or more of the site area may be required for SuDS provision

		<p>alone.</p> <p>County would appreciate a discussion regarding the relationship between open space and highway design. Need to consider how planting relates to highway design and maintenance requirements, and opportunities for future widening. May be a matter for forthcoming design guidance, rather than local plan directly.</p>
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25731	Sport England	Sport England supports this policy which seeks to secure new opportunities for sport and recreation. We also support the flexible approach to on-site or off-site provision.
26107	Suffolk Constabulary	The provision of new open space must comply with the relevant SBD guidance, in particular reference to having clear boundaries between public and private spaces, not to immediately abut residential areas, to avoid locating such facilities at the rear of dwellings, to ensure that small children's play areas can be made secure at night and to ensure that the provision of any informal spaces aimed at young people is only done following formal consultation with the DOCO;
25621	Suffolk Wildlife Trust	Whilst paragraph 9.6.7 recognises that green spaces should provide wildlife habitats as part of the wider ecological network, this does not appear to be included as part of policy DM6. The policy should include the requirement for new open spaces, sport and recreation facilities to provide ecological enhancements as part of their design and implementation, in order to create multi-functional spaces which are of value to people and wildlife.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25823	Cardinal Lofts (Mill) Ltd	The Company's comments, in respect of this policy, follow on from those set out above in relation to Policy CS16. The Company again

		<p>offers its general support to the objectives of the policy but considers that it needs to be more explicit in recognising that, on higher density, previously developed, sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council's standards.</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

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

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

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

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

A distinction between the 10% public open space requirement and the provision of SuDS specifically has not been included. Where SuDS occupies 10% or more of a development and is part of the public green space then the circumstances of whether it is feasible to compensate this at the expense of another typology can be applied on its merits. This is set out in the fourth paragraph of the policy.

Consequently, the need to include SuDS which may occupy 10% or more of the site area will not automatically override the provision of alternative typologies.

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

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

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

Representations	Comments	Object	Support
3	0	3	0

Other Organisations

The following comments were made in response to this issue:

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

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25793	Home Builders Federation	We could not find any evidence to support the level of private outdoor space being proposed in this policy. The size of any private outdoor space should be left to the discretion of the developer who are aware of the demands of their customers. The approach taken by the Council could potentially reduce the amount of land available for housing in what is a very constrained borough. Therefore, we would

		suggest that whilst we accept that some private outdoor amenity space will be required the Council should not set out minimum specifications for such space.
25824	Cardinal Lofts (Mill) Ltd	As with the comments relating to Policies CS16 and DM6, there should be explicit recognition that, in respect of high density, previously developed, sites, it may not always be possible to make full provision for private amenity space to accord with the Council's standards.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

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

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

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

43.DM8 – The Natural Environment

Representations	Comments	Object	Support
11	0	11	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25947	Environment Agency	DM8 - The Natural Environment- should be refined to say that "Sites of Special Scientific Interest (SSSI) will be protected from development". Similarly, the policy wording for the planning permission section should be strengthened to state that "planning permission will not be granted for development that would result in damage or loss in extent or otherwise have significant adverse effect on Local Nature Reserves or Local Sites".
25948	Environment Agency	Policy DM8 - The Natural Environment - the sixth paragraph should be strengthened to say "Enhancements for protected sites and protected and priority species will be expected from new development". The wording of the final paragraph in the policy should be strengthened to say "Within the buffer zones around core areas and corridors, development will be required to enhance the ecological networks through measures such as wildlife beneficial landscaping".
25949	Environment Agency	DM8 - The Natural Environment. The wording of the final paragraph in the policy should be strengthened to say "Within the buffer zones around core areas and corridors, development will be required to enhance the ecological networks through measures such as wildlife beneficial landscaping".
25950	Environment Agency	The policy should include reference to Biodiversity Net Gain. The Defra 25 Year Plan (2018), available here https://www.gov.uk/government/publications/25-year-environment-plan , includes a policy to embed the 'environmental net gain' principle for development. This will enable development without increasing overall burdens on developers. The planning system should provide biodiversity net gains where possible as required in NPPF paragraph 170.
25951	Environment Agency	Paragraph 9.8.7 could be enhanced by making reference to the river corridor, preferably in a standalone paragraph, describing how new development along the river corridor will be required to enhance the biodiversity value of the riparian zone and ensure water quality is protected and enhanced.
25764	Natural England	Support this policy. We highlight the importance of measurable net gain in the creation of habitat and improvements to biodiversity and refer you

		to the Defra 25 YEP and paragraph 174 of the National Planning Policy Framework We advise that Policy ISPA3 is referenced in Policy DM8 as it affords the protection of designated sites by providing a mechanism to offset recreational disturbance impacts.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25858	Ravenswood Environmental Group	The policy causes a conflict with the allocations policies because the allocations will have an adverse impact on European Protected sites. The huge housing and industrial development at Ravenswood could be located on an alternative site that would cause less harm to the SPA so Policy DM8 mandates that the Ravenswood development should be refused. The plan therefore unreasonably allocates land for development whilst including policies which would see that development rejected.
25776	RSPB	We support the measures to enhance conditions for biodiversity. The text relating to European (Natura 2000) sites under Sites of international and national importance does not correctly capture the step-wise process of the Habitats Regulations. The reference to 'in-combination effects' should remain (not marked as deleted); it is silent on the 'absence of alternative solutions' and should refer to compensatory measures that would be required should IROPI be concluded. Paragraph 9.82 - line 2: Add Birds and Habitats Directive line 10: Amend to 2017 (from 2010)
25622	Suffolk Wildlife Trust	We support the intentions of this policy. However, the text in relation to SSSIs does not appear to be compliant with NPPF paragraph 175(b). The Priority Habitats and Species sections must also include reference to development delivering ecological enhancements as part of their design and implementation. Enhancements for species such as swifts and

		hedgehogs should be secured as part of new residential developments. The intention in the final sentence to encourage development to enhance the ecological network where possible is not supranational enough. All new development should deliver ecological enhancements as per the NPPF (paragraph 170(d)).
25630	Suffolk Wildlife Trust	Paragraph 9.8.3 states that there are 19 County Wildlife Sites in the Borough, however policy CS4 states that there are 20. This should be checked for consistency.
26139	Suffolk Wildlife Trust	Paragraph 9.8.2 makes reference to the Conservation of Habitats and Species Regulations, it should be noted that these regulations were updated in 2017 and references to them should be amended accordingly.

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners
Members of the public

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

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

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

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

The policy wording relating to SSSIs has not been amended. The Council considers the policy as worded originally affords greater protection as it allows the indirect

impact of development to be considered. The Environment Agency's proposed wording could be interpreted narrowly in terms of direct impacts only.

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

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

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

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

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

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

RSPB (See DM15) and Suffolk Wildlife Trust also advocated a requirement to this effect.

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

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

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

The policy is not considered to cause a conflict with the allocations policies in respect of Ravenswood and an adverse impact on European Protected Sites. The allocation of land at Ravenswood for development establishes the principle of development and uses that may come forward on these sites. It cannot be assumed that development in principle would have an adverse impact on the nearby European Protected Sites. Ultimately, it will be the role of the applicant of any future planning applications on these sites to demonstrate that there is no adverse impact on European protected sites, and, if there is, that it cannot be located on an alternative site as per the requirements of the Habitats Regulations (2017).

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

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

44. DM9 – Protection of Trees and Hedgerows

Representations	Comments	Object	Support
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3		2	1
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Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

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

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

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

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

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

45. DM10 – Green Corridors

Representations	Comments	Object	Support
6		4	2

Parish and Town Councils

The following comments were made in response to this issue:

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

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25766	Natural England	Natural England fully supports policy requirements to protect and enhance the natural environment, including green infrastructure and ecological networks and to ensure development design contributes towards local biodiversity. We would support a requirement for all development to contribute biodiversity net gain, in accordance with the NPPF and Defra YEP, wherever possible.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25799	AONB	The AONB team fully support the aspiration to create a green rim round the periphery of Ipswich borough. As well as providing an ecological link for wildlife, such an asset can provide opportunities for commuting, recreation and help encourage active live styles.

		Such a network can also alleviate pressure on more sensitive coastal European sites. A similar project exists in Colchester; the Colchester Orbital - which may be useful for the emerging Green Rim project in Ipswich
25632	Suffolk Wildlife Trust	Policy DM10 and Plan 6 set out the green corridors through the town, linking out to the surrounding areas. We note that the policy and plan also include a blue corridor along the River Gipping from the Wet Dock to the edge of the Borough. We query why this corridor is not shown extending east and then south along the Gipping and in to the River Orwell? This whole stretch is designated for its nature conservation value (including Special Protection Area, Ramsar site, SSSI and Country Wildlife Site) and forms an important corridor within and out of the town.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25937	Ashfield Land Limited	The wording of DM10 must be carefully considered. For example, reference to Plan 6 shows that land to the north of Whitton Lane is included as part of the green rim. This land is also allocated for employment use. This demonstrates that, if applied too literally, DM10 could conflict with other key allocations. It is clear in certain cases (Whitton Lane) that there will be limited opportunities for the site to contribute to the creation of a green rim. The policy should recognise that the application of the green rim policy must take account of other proposed and permitted uses.

The following made no comments in response to this issue.

Members of the public

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

The policy wording and reasoned justification in relation to development close to river banks has been amended. This is in response to the request from the Environment Agency. The new policy wording for development to consider

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

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

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

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

46. DM11 - Countryside

Representations	Comments	Object	Support
3	0	2	1

Statutory Consultees

The following comments were made in response to this issue:

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

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25801	AONB	Amend paragraph 3 of this policy as follows: In the case of the AONB, major development will

		only be permitted in exceptional circumstances in accordance with NPPF paragraph 172. The Natural Beauty landscape and Special Qualities of the AONB should be conserved and enhanced.
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Members of the public

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

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

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

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

47.DM12 – Design and Character

Representations	Comments	Object	Support
13	0	13	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26050	Historic England	We welcome the policy commitment to the special character and distinctiveness

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

		space and highway design. Need to consider how planting relates to highway design and maintenance requirements, and opportunities for future widening. May be a matter for forthcoming design guidance.
25991	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 2: Improving independent life for people with physical and learning disabilities: Policy CS5 refers to accessibility in respect of transport but does not directly refer to the varying needs of the population as a whole apart from in supporting text. Should consider moving this requirement into policy - to complement DM12.</p> <p>The requirement that 25% of new dwellings meet the M4(2) requirement (Policy DM12) is supported.</p> <p>Could also set a policy requirement that some sites include specialist housing for those with physical or learning disabilities as part of their overall housing mix.</p>
25992	Suffolk County Council	<p>Joint Suffolk Health and Wellbeing Strategy - Outcome 3: Older people in Suffolk have a good quality of life:</p> <p>Support the 25% of new homes meet the M4(2) requirement. Would support a higher percentage.</p> <p>Should consider a policy which guides new development to consider ageing as a design issue. E.G. Dementia Friendly Design as a requirement for new development as it would benefit not just those suffering from cognitive impairments but would also respond to the ageing population.</p> <p>Should also consider the allocation of specialist housing for older people, perhaps as part of the overall housing mix on larger sites.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25803	AONB	Should this policy reference the emerging Suffolk Design Guide?
25884	Associated British Ports	Supportive of IBC's desire for all new development to be well designed and sustainable, for 25% of new dwellings to be

		built to Building Regulations standard M4(2), and for proposals to respect the special character and distinctiveness of Ipswich including ensuring good public realm design. However, this should not be at the expense of development viability and the policy should be applied flexibly in the context of the objective to achieve sustainable regeneration.
26134	Ipswich and East Suffolk Clinical Commissioning Group	We would support a design policy that promotes social inclusion, particularly for the ageing population and provides easy access to local services, without the use of a private vehicle. We would also request that consideration is given to design of access within new developments for blue light services.
26778	RSPB	Suggested alternative wording, consistent with other points raised: Provision to support biodiversity should include measures such as nestboxes for birds (swifts, house sparrows, starlings) and bat boxes integrated in to the fabric of the building.
25732	Sports England	Sport England supports this policy which seeks to establish attractive and safe areas of public realm that encourage people to use them for formal and informal activity. Sport England have published 'Active Design' which gives advice on how to make environments attractive and encourage physical activity. We would welcome reference to this document in the supporting text to this policy.
26109	Suffolk Constabulary	The Council has committed to creating safe and secure communities and this should be reinforced by requiring that all new and refurbished developments must comply with the relevant SBD guide (as opposed to the current statement that consideration be given to it). Section a should be amended thus 'help create safe and secure communities by complying with the relevant Secured By Design guide.' This policy should also highlight the broader elements of designing out crime, beyond lighting and CCTV. See full text for suggested wording as a replacement to paragraph 9.12.

The following made no comments in response to this issue.

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

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

Data from Sport England's Active Design report shows that only 14.29-17.94% of adults in Ipswich participate in 30 minutes of sport and active recreation on three or more days a week. In light of which the Council is keen to adopt Sport England's Active Design Guidance. The guidance outlines the issues that need to be considered in the master planning of new developments to encourage communities to be naturally active as part of their daily life by promoting physical activity, walking and cycling. Paragraph 9.12.11 now focuses on sustainable travel and active design and makes specific reference to the Active Design Guidance published by Sport England. Reference to the need for provision for the recycling of waste materials has been removed from paragraph 9.12.11 but remains in 9.12.17.

Changes have been made to policy DM13 to provide a more local context. A link has also been made to DM13 and DM14 in policy DM12.

The policy has been amended to include reference to biodiversity net gain. However, it is considered that the explicit requirement for biodiversity net gain is best served in Policy DM8 The Natural Environment.

Policy DM12 has been amended to require development to promote local heritage and distinctiveness, however it is considered that the requirement is best served through policy DM13 Built Heritage and Conservation. The Council agree that tree planting and maintenance along the highway should be a matter for the Suffolk Design Guide.

The percentage of new homes complying with the Building Regulations Standard M4(2) is considered sufficient to meet the needs of the local population based on data from the Suffolk Housing Survey.

Ipswich is committed to becoming a dementia friendly community. The Office for National Statistics predicts the population for the over 65 age group is set to increase by 59.7% between 2014 and 2039 across Suffolk. The RTPI's recent Dementia and Town Planning Document and the Alzheimer's Society state that nationally there are currently 850,000 people living with dementia in the UK. This is set to increase to 1 million by 2021 and to 2million by 2051. It is therefore important that the design of the built environment caters for people throughout their lifetime and is suitable and accessible for people regardless of age, mobility or disability. The policy establishes the considerations against which residential developments will be considered, to provide for the needs of the most vulnerable in our society.

Integrated nest boxes require no ongoing maintenance and repair and are supported by the RSPB.

The Council is committed to reducing anti-social behaviour and crime and acknowledge that the planning system can play an important role in ensuring appropriate measures are in place in relation to crime prevention and security. The policy has therefore been amended to take account of comments from Suffolk Constabulary. However, in some cases design solutions are not complaint with designing out crime guidance but meet the objective of the guidance. Hence the Council has added 'where appropriate to do so' to the changes suggested.

The Council consider it premature to refer to the emerging Suffolk Design Guide, given that the document has not been through public consultation.

48.DM13 – Built Heritage and Conservation

Representations	Comments	Object	Support
3	0	3	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26051	Historic England	Recommend that Local List is expanded to cover other types of undesignated heritage assets or where documented in conservation area appraisals it's highlighted in policy terms. The repetition of the NPPF tests in the second and third paragraphs should be reviewed as they refer to all heritage assets. Wording must be consistent with paragraphs 194, 195, 196, and 197. Alternative is to refer in policy that the tests on harm in the NPPF will be followed. Grammar error. Consideration to incorporating requirements in supporting text into policy such as what the requirements are for a heritage statement etc.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26110	Suffolk Constabulary	In order to ensure that listed buildings are not allowed to suffer repeated damage or unauthorised access, it is recommended that

		paragraph 9.13.17 is amended to include the following 'In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency and security of those buildings....';
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25826	Cardinal Lofts (Mill) Ltd	The Company supports the general objectives set out in this policy, but considers that it should be re-worded, particularly in respect of the tests relating to harm caused to heritage assets, to better accord with the wording set out in the NPPF. In particular, the three criteria relating to listed buildings do not include a balancing exercise, whereby harm caused is weighed against any public benefits arising from a scheme.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

The changes to this policy have been included because of the non-compliance of the existing DM13 in the preferred options version of the emerging Local Plan with the 2019 NPPF. In addition, reference is made to relevant SPD to provide a more local context as well which has been a criticism made by Historic England regarding the older policy. A link has also been made to DM13 as archaeology is also considered as heritage assets and reference is made to this in the policy. This is because the treatment of archaeology (an important aspect of the local character and distinctiveness of Ipswich), merits a separate policy.

New text has been added on the requirement for a Heritage Statement, to ensure that developers are clear on the level of information expected in a submitted Heritage Statement and to reinforce that Heritage Statements need to be relevant proportionate and appropriate to the proposal being submitted.

The changes proposed have been prepared positively in line with the National Planning Policy

49. DM14 – Archaeology

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26052	Historic England	We would expect to see clear provision in policy for non-designated heritage assets of archaeological interest which are demonstrably of significance to scheduled monuments.
25979	Suffolk County Council	DM14 is the main policy for managing the process of consideration of archaeology and the County Council would welcome the opportunity to discuss the policy wording further. The supporting text could also usefully make reference to the Scheduled Ancient Monuments.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The policy has been amended significantly in light of discussions with the Suffolk County Council Archaeological Unit.

Ipswich Borough Council wish to protect and enhance the distinctive heritage assets of the area. The Council recognises that Heritage assets are non-renewable resources, intrinsic to the character and 'sense of place'. The Local Plan should offer recognition and additional protection to non-designated heritage assets, the new policy text does this.

It is proposed to update the supporting text to clarify the importance of the archaeological deposits which underlie Ipswich. Ipswich has a rich archaeological

heritage and is of international importance because of its status as one of only four Middle Saxon 'emporium' or 'wic' sites in England. For continuity, the new text is taken from the introductory chapter of the Ipswich Archaeology Supplementary Planning Document (SPD) published in February 2019.

50.DM15 – Tall Buildings

Representations	Comments	Object	Support
4	0	4	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26053	Historic England	The policy and supporting text as currently drafted includes a definition by which The Winerack could be taken as a baseline for defining a tall building in Ipswich. This is counter to the historic building heights within Ipswich. We also are concerned that the tall building arc identified on the IP-One Policies Map includes a significant area within the setting of grade I Willis Building. We would be happy to discuss this further with you prior to the next iteration of the Plans.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25885	Associated British Ports	ABP welcomes IBC's policy on tall buildings consistent with its desire to secure high density development in the town centre and Waterfront (para 6.20 and Policy DM23). As presently drafted, the policy and supporting text do not make it sufficiently clear whether the Island Site is considered appropriate for tall buildings, or whether tall buildings in this location would be appropriate where they meet the criteria of Policy DM15 and where development viability justifies it. ABP requests clarification on this point.
25779	RSPB	At the Issues and Options stage, we made a representation (24740) to include a further line:

		<p>k) to incorporate integrated swift-bricks. We respectfully ask that this is included. Swift-bricks are inexpensive (c£20) and their inclusion will benefit a species that has undergone rapid decline within urban environments in the last 25 years. Such wording is not without precedent. The Hackney proposed submission local plan (Policy LP47d) asks that "all development proposals with an eaves height of 7 metres and above are required to provide nesting boxes for swifts..."</p> <p>We consider that this additional simple measure will provide further enhancement.</p>
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25825	Cardinal Lofts (Mill) Ltd	<p>Whilst the Company generally supports the policy, it is noted that Site IP035 is excluded from the 'arc of land', where tall buildings may be appropriate.</p> <p>This may not be significant/ material, as a 'tall' building is defined as one which is substantially taller than its neighbours or which significantly changes the skyline. In, this respect, there are buildings of between 7 and 15 storeys adjacent to the southern boundary of the site.</p> <p>If the development of IP035 would be subject to this policy however, then an objection is raised to the exclusion of the site from the arc.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

Criterion 'a' has been amended to include reference to heritage assets for clarity. The reasoned justification does confirm that the impact on heritage assets will be taken having regard to the National Planning Policy Framework (NPPF) and the Planning (Listed Buildings and Conservation Areas) Act 1990. However, it was felt

appropriate to set out this expectation within the policy wording to provide greater clarity.

Paragraph 9.15.2 has been amended to delete 'and /' in defining tall buildings. This is in response to concerns raised by Historic England as they have argued the current definition could be argued to use the Winerack as the baseline for defining a tall building. Although the use of and/ or for the two scenarios (taller than their neighbour and/ or which significantly change the skyline) does technically allow the decision-maker to apply this policy in circumstances where only one of the scenarios has been triggered, removing the 'and /' does provide greater certainty about the mechanism for defining tall buildings. The reference to the updated Historic England Tall Buildings Advice Note (4) (2015) has also been included.

In making the above changes, the concern regarding the tall building arc and the setting of the Grade I Listed Willis Building is considered to be addressed. This was a concern raised by Historic England. Through the application of this policy, policy DM13 (Built Heritage and Conservation) and the provision of the NPPF, the impact on the setting of Listed Buildings such as the Willis Building will be appropriately assessed. The retention of the Tall Building Arc does not outweigh the setting of any nearby heritage assets which will need to be appropriately assessed as part of any development proposals that come forward in the Arc.

The policy has been amended to include fire safety specifically in terms of building users as part of criterion C. This is to make clear that fire safety is a relevant consideration in the planning policy.

The additional criterion recommended by the RSPB for integrated swift bird boxes in the policy has not been included. This is because integrated swift boxes are capable of being integrated into developments of 4 metres or higher and subsequently limiting integrated swift boxes to tall buildings would be counter-productive. Following follow up discussions with the RSPB, it was agreed that this should instead be inserted into policy DM8 (The Natural Environment) to ensure that opportunities for this measure are not missed. Consequently, it is not considered necessary to add a criterion to policy DM15.

The Tall Building Arc has not been amended to include site IP035 (College Street) within the arc of land. This is because site IP035 contains and is immediately adjacent to a series of sensitive heritage assets and therefore it is unlikely that a building taller than those on the neighbouring arc of land to the south will be encouraged. The site is within Opportunity Area B (The Merchant Quarter) where buildings outside the tall building arc should be limited to generally low rise (3 storeys) with increased scale at focal points up to a maximum of 5 storeys, to reflect historic grain and scale. Overall, as this site is not considered appropriate for a tall building, it is not necessary to amend the tall building arc zone.

Similar to the above response, the tall building arc has not been amended to include site IP037 (The Island Site). The site is within Opportunity Area A (Island Site) where generally low to medium rise development (3, 4 and 5 storeys) is advised to maintain the essential character of the Wet Dock Conservation Area and protect significant views across from the outer edges of the Waterfront. Therefore, as this site is not considered appropriate for a tall building, it is not necessary to amend the tall building arc zone.

51.DM16 – Extensions to Dwellings and the Provision of Ancillary Buildings

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26111	Suffolk Constabulary	Section d should be amended as follows ' would not adversely affect the residential amenity of occupants of nearby properties, particularly in terms of privacy, light, security or overbearing impact. A further section should also be added — i) it is built in accordance with SBD Homes guidance. Paragraph 9.16.2 refers to extensions being set back from the building line by four metres. There is a danger that this will create blind spots not subject to natural surveillance and this must be taken into consideration

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

Ipswich has the highest number of criminal offences committed across the Ipswich Housing Market Area. The Council is committed to reducing anti-social behaviour and crime and acknowledge that the planning system can play an important role in ensuring appropriate measures are in place in relation to crime prevention and security. It is therefore propose to amend clause d, to require extensions to dwelling

houses and residential annexes to be designed in accordance with Secure by Design principles.

The Ipswich Local Plan includes a requirement for two storey and first floor side extensions to be set back behind the main front wall of a house by 4 metres to ensure the extension remains subordinate to the original dwelling house. Suffolk Constabulary consider that setting an extension back from the main building line could create a blind spot, not subject to natural surveillance. The Council agree that in certain circumstances the requirement for a setback could leave a property vulnerable to criminal activity. The Council intend to amend the accompanying policy text to require schemes that include recesses to be designed to avoid providing the opportunity for anti-social behaviour or crime.

The Council require side extensions to maintain external access to the rear garden. The word 'possibility' doesn't make it clear what the applicant will need to do. The amended text avoids ambiguity about the intention of the policy.

52.DM17 – Small Scale Infill and Backland Residential Developments

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26019	Suffolk County Council	The commitment to meeting adopted parking standards is welcomed, but we have experience locally of severance plots resulting in a loss of parking for existing dwellings. The policy could helpfully reflect this issue by stating (in part g) that development should meet parking standards and not lead to an unacceptable loss of parking serving existing dwellings.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The County Council have identified that the development of severance plots locally has resulting in a loss of parking for existing dwellings, resulting in increased pressure for on-street parking. Data from the Suffolk Guidance for Parking shows that although the level of car ownership has increased, the growth of traffic on the highway has not increased to the same level. This indicates that a greater number of vehicles are likely to be parked at the owner's place of residence. The Council intend to amend Clause G of Policy DM17 to ensure the development of severance plots does not lead to an unacceptable loss of parking services for existing dwellings, placing added pressure onto an already densely utilised parking network.

53. DM18 - Amenity

Representations	Comments	Object	Support
3		3	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25699	Anglian Water	Anglian Water is generally supportive of the Policy DM18 but considers that it should be made clear that new development should not prejudice the continued operation of established uses in Anglian Water's ownership and that mitigation of amenity impacts is not feasible in all circumstances.
25954	Environment Agency	We welcome the reference to mitigation measures being required in regards to contamination in policy DM18 - Amenity. Paragraph 9.18.11 specifically refers to contaminated land and states that development on contaminated land can expose people to a wide range of potential health risks. This sentence should be enhanced by stating that it can also mobilise contaminants and cause pollution of controlled waters.
25955	Environment Agency	We are pleased to see paragraph 9.18.11 states that "applicants who wish to develop suspected contaminated land will be required to undertake a thorough investigation of the site to determine any risk". This could be further enhanced by adding that it will be required to undertake a thorough investigation to determine any risk to human health and controlled waters (including groundwater).

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations
Developers and Landowners
Members of the public

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

The Council is keen to avoid conflict between incompatible uses and will seek to ensure that existing and future uses can operate effectively without being in conflict with other sensitive uses such as housing. Policy DM18 was designed to provide advice on this matter, however the representation from Anglian Water suggest that the existing policy text does not make clear that new development should not prejudice the continued operation of established uses. It is therefore proposed to amend the existing policy text to clarify that new development that would adversely affect the continued operation of established uses will not be permitted.

The Environment Agency have suggested two changes to the accompanying policy text. The proposed new text confirms the risks of developing on contaminated land and clarifies why an applicant will be required to undertake a contaminated land assessment. The Council is committed to ensuring that policies provide sufficient information and advice to guide applicants developing on sensitive sites. As such, the Council will amend the accompanying policy text to include the additional supporting information recommended by the Environment Agency.

54.DM19 – The Subdivision of Family Dwellings

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26112	Suffolk Constabulary	Section e should be amended thus — 'incorporates a secure front door for each unit of accommodation and provides an appropriate standard of residential amenity including secure windows, CCTV coverage of the communal entrances and provision for secure mail delivery.'

The following made no comments in response to this issue.

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

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

Research suggests that those living in Houses in Multiple Occupation suffer from disproportionately high levels of crime. Suffolk Constabulary have suggested some specific physical security measures that may be used by the private rented sector to provide a safe and secure environment. However, rather than making reference to a limited number of specific measures, the Council intend to amend the supporting text to require developments to be designed to minimise crime and anti-social behaviour. This gives the Council the opportunity to recommend appropriate security measures to address possible threats relevant to that location. It also allow the Council to respond to the most up to date information available from the police and other agencies about the nature of potential threats and suggest appropriate and proportionate security measures.

Reference to 'secure' in clause e has been included to ensure that security for sub-divided dwellings is not compromised

The National Planning Policy Framework (NPPF) 2019 requires local plans to positively seek opportunities to meet the development needs of their area. It is good practice for policies to be positively worded unless a brief negatively worded policy would be clearer.

The Local Housing Need projections indicate that the total population of families with children in the Ipswich HMA is going to rise from 67,267 in 2018 to 72,765 by 2036. Therefore, in order to protect the existing small family housing stock, and to allow for adequate residential space standards in the proposed subdivided dwelling, the subdivision of existing properties of less than 3 bedrooms or 100sq.m will not be permitted.

55. DM20 (new policy) – Houses in Multiple Occupation

Representations	Comments	Object	Support
N/A	0	0	0

This is a new policy that was not consulted upon at the Preferred Options stage. It will be consulted upon as part of the Regulation 19 Final Draft Local Plan.

56. DM21 (formerly DM20) – Transport and Access in New Developments

Representations	Comments	Object	Support
4	0	3	1

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25612	Westerfield Parish Council	Westerfield Parish Council strongly support the policy DM21 and in particular paragraph 9.20.1 (now 9.21.1) where the Council is clearly committed to ensure that existing transport infrastructure is not adversely affected while determining planning applications.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26000	Suffolk County Council	<p>County recommend re-draft of policy to include:</p> <ul style="list-style-type: none"> - Requirement for maximisation of sustainable transport and safe access; - Indicative thresholds for documents in line with County guidance; - Need for assessments to include cumulative impacts; - Requirement to protect, enhance and connect to rights of way. - Consideration of school safety and routes; - Encourage car club facilities; - Clear framework requiring significant impacts to be limited and refused in certain circumstances. <p>Additional supporting text explaining travel plan justification. Paragraph 9.21.8 could be split in two. See suggested wording.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25683	Northern Fringe Protection Group	It remains unclear how 'severe' and 'significant' adverse impacts are defined. These need to be clearly defined in the CS. In the case of air quality, there are maximum legal limits for particulates and nitrous oxides, and it would be appropriate for 'significant' to be defined as the legal limit.

26113	Suffolk Constabulary	The word permeability should be removed from `d' in order to promote security and the following addition made; d. promote pedestrian and cycle accessibility to and within the site, ensuring that any new routes are coherent, clearly segregated for pedestrians and cyclists, overlooked and in accordance with the design principles of policy DM12.
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The following made no comments in response to this issue.

Developers and Landowners

Members of the public

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

The policy has been amended to reflect more closely the wording of the NPPF in relation to transport impacts (paragraph 109) and, in discussion with Suffolk County Council, to ensure that sustainable travel modes are maximised through new developments. Thresholds for triggering transport assessments have been amended and a new requirement for transport statements introduced. The thresholds proposed would capture the majority of new dwellings to be provided through allocated sites. The policy has also been changed to reflect the need to consider access for disabled people and people with reduced mobility and to acknowledge the climate change emergency and air quality issues by raising the requirement for electric vehicle charging facilities.

The policy has been amended to reflect more closely the wording of the NPPF in relation to transport impacts (paragraph 109). The NPPF does not provide a definition of 'severe' or 'unacceptable' and therefore it is not considered appropriate to do so through the Local Plan. The Highway Authority has advised that impacts can only be assessed on a case by case basis as they will depend on the local circumstances and the nature of the proposed development.

The policy has been amended to remove reference to permeability and refer instead to routes being coherent and designed in accordance with policy DM12. A reference to safe routes has also been added to the supporting text, as it is recognised that people will be more likely to choose active travel if they feel safe.

57. DM22 (formerly DM21) – Car and Cycle Parking in New Development

Representations	Comments	Object	Support
5		4	1

Statutory Consultations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26020	Suffolk County Council	<p>Support intent of policy but further discussion required in respect of car parking needs. Assumed that 'operational' parking within the central car parking core doesn't refer to staff car parking - Please clarify.</p> <p>Reference to secure cycle parking is welcomed, but 'security' needs to be defined and explained fully in supplementary guidance (E.g. Suffolk Guidance for Parking, forthcoming countywide design guidance or the IBC SPD). The supporting text could also explain that secure means a lockable facility away from public access, lit, covered and has natural surveillance. In respect of employment, cycle parking needs to be suitable for long stays</p>
25956	Environment Agency	<p>DM21 - Car and Cycle Parking in New Development includes reference to flood risk in paragraph 9.21.6 by stating that this is acceptable in flood risk terms as demonstrated through a Flood Risk Assessment. When considering car parking within flood risk areas, the ability of people to move their cars within the flood warning time should be considered. Long-term and residential car parking is unlikely to be acceptable on areas which regularly flood to a significant depth due to the risk of car owners being away from the area and being unable to move their cars when a flood occurs</p>
25957	Environment Agency	<p>Policy DM21 - Car and Cycle Parking in New Development - Car parking can be appropriate in areas subject to flooding, provided that flood warnings are available and signs are in place however, ideally car parks should not be subject to flood depth in excess of 300mm since vehicles can be moved by water of this depth. Boundary treatments such as railings should ensure that if vehicles become mobilised during a flood event, they are contained within the confines of the site but still allow the free movement of flood water.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26114	Suffolk Constabulary	The presumption must be in favour of in curtilage parking and non-secure under-croft parking must be avoided. Where communal parking is necessary, rear parking courtyards must be avoided and owners should be able to view their vehicles from active rooms within the building. SBD guidance must be followed when providing underground parking to ensure that it is safe and secure.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25827	Cardinal Lofts (Mill) Ltd	The Company welcomes the recognition (para 9.22.6) that many people still own cars and that adequate levels of residential parking, that uses land efficiently and is well designed, needs to be provided as part of new residential schemes.

The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

The changes proposed by the Environment Agency have been incorporated into the supporting text in order to clarify the acceptability (or not) of car parks within flood zones.

The policy and supporting text already define what is expected of cycle parking and what is meant by operational parking. However, supporting text has been added to refer to natural surveillance of cycle parking.

Reference to secure by design has been added to the supporting text to ensure that car park users feel safe.

58.DM23 (formerly DM22) – The Density of Residential Development

Representations	Comments	Object	Support
2	0	1	1

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25886	Associated British Ports	ABP welcomes IBC's support for high density development in the town centre and Waterfront. ABP also welcomes IBC's qualification that it will not insist on the requirement to meet Nationally Described Space Standards if this is demonstrated to be unviable in specific cases.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25828	Cardinal Lofts (Mill) Ltd	The Company welcomes the support for high densities of residential development in the Portman Quarter and Waterfront areas. The Company does take issue with the assertion (para 9.23.4) that the highest density of residential developments are unlikely to be viable due to a combination of rising build costs and relatively low sale values for flats. This may be the case in respect of two and three bedroom flats, aimed at the mature housing market, but there remains a very high demand for small, one and two bedroom flats, aimed at first time buyers.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

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

Paragraph 9.23.4 has been amended to specify that the low sales values for flats is generally concerning larger two and three-bedroom flats. This is in response to a concern that the original wording of 'low sales values for flats' does not take account of the high demand for small, one and two bedroom flats, aimed at first time buyers. The amended wording provides greater clarity as a result.

59.DM24 (formerly DM23) – Protection and Provision of Community Facilities

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25578	The Theatres Trust	Supportive of this policy although consider that arts and cultural facilities might be brought into this policy. Welcome that there is additional policy provided regarding public houses which face unique challenges compared to other types of community facilities. As well as providing spaces for community meeting, pubs can provide vital spaces for performance at grass-roots level and enhance access to cultural activity.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25670	NHS Property Services Ltd	DM24 - Protection and Provision of of Community Facilities restricts the loss or change of existing Community Facilities. NHSPS objects as the NHS requires flexibility in its estate to ensure that unneeded or unsuitable sites may be disposed of for their best value. Policies which aim to prevent the loss of or change of use, where healthcare is included are considered overly onerous and inflexible. Other rigorous tests exist overseen by NHS commissioners. An alternative wording is offered that would allow NHS support for the policy.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

The Council recognise that access to healthcare can prevent ill health and lead to better management of long term conditions. Ipswich has a wide range of health facilities, however as the population grows and ages there will be a requirement for different models of health and social care provision. Policy DM24 seeks to retain existing community facilities (healthcare facilities are included within this definition), unless one or other of the following tests can be met. Either the applicant must demonstrate to the Council's satisfaction that the facility is genuinely redundant, adequately marketed and surplus to current and future requirements; or alternative provision of an equivalent or better facility is proposed or available within a reasonable distance to serve its existing users. The NHS have indicated that policies aimed at preventing the loss or change of use of community facilities and assets (where healthcare is included within this definition), can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. The Council consider that the either or test in DM24 provides sufficient flexibility, however it is happy to provide additional comfort to NHS through the inclusion of the proposed new wording. The new wording will also offer the Council the added assurance that adequate health facilities are or will be made available to meet the ongoing needs of the Borough's population.

The Council do not intend to bring arts and cultural facilities into Policy DM24 as suggested by the Theatres Trust. Whilst accepting arts, culture and tourism has community role they also have an economic function which the Council would like to ensure remains part of the tourism offer. The Council already has a separate policy that supports the retention and enhancement of arts and cultural facilities in the Borough, Policy DM28 (Arts, Culture and Tourism). The Council will however amend the accompanying text to policy DM24 to highlight this.

Paragraph 9.24.2 of DM24 sets out what the Council include within its definition of community facilities. It is proposed to combine 'doctors and dentist surgeries, health centre and chemists' into a single bullet point 'health facilities'. This simplifies the policy text and avoids duplication.

The Council must be clear on what information is required to accompany a planning application for the loss or reduction of pub facilities. The Council will insert additional text at the end of paragraphs 9.24.6, to clarify that marketing requirements are set out in appendix 7. The Council will also insert additional text at the end of paragraph 9.24.12 confirming that a viability report must accompany an application to reduce a public houses floorspace or outdoor space. Including this additional detail within the accompanying policy text will help to avoid delays associated with processing applications.

60. DM25 (formerly DM24) – Shopfront Design

Representations	Comments	Object	Support
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0	0	0	0
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No change recommended

61. DM26 (formerly DM25) – Advertisement

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No change recommended

62. DM27 (formerly DM26) – The Central Shopping Area

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

Although no external comments were made, the Council has elected to further amend this policy. This is because, upon reflection, the revised wording (as originally drafted) was too complex and required a simpler and more flexible solution to

changes of use in the Central Shopping Area. The policy has therefore since been amended to help achieve this.

63. DM28 (formerly DM27) – Arts, Culture and Tourism

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25577	The Theatres Trust	<p>Welcome the support for arts and cultural facilities but there are concerns that policy DM28 does not provide sufficient strength in terms of loss of facilities. This is because 'unviable' is subjective and can be manipulated. For example, a facility with little commercial financial return could be successfully retained if operated under an alternative model. It requires demonstration that facilities are no longer required by the community and that efforts to market have been unsuccessful. Facilities could be under DM24 instead.</p> <p>There are also other performance facilities that should be referenced.</p> <p>Temporary and pop-up events are supported.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The Council must be clear on what information is required to accompany a planning application for the loss of an arts, cultural or tourist facility. Therefore reference to the marketing strategy in appendix 7 has been made.

Development management (DM) policies DM31 and DM30 were inaccurately referenced, the Council will update the policy text to ensure users of the plan are being directed to the correct inter-related DM policies.

64.DM29 (formerly DM28) – The Evening and Night-time Economy

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26021	Suffolk County Council	This policy includes a reference to traffic generation, with the implication being that the proposals would be refused if there is a 'significant individual or cumulative effect on traffic generation'. National policy states that proposals should only be refused on highway grounds if there is a severe impact. This policy should be redrafted to ensure consistency with the NPPF in respect of highway impacts or, if the intent is to manage the amenity impacts arising from night time vehicular movements, clarify that point.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

National policy states that proposals should only be refused on highway grounds if there is a severe impact. The policy has been redrafted to ensure consistency with the NPPF in respect of highway impacts.

65.DM30 (formerly DM29) – District and Local Centres

Representations	Comments	Object	Support
3		2	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25725	Freeths LLP on behalf of AQUIGEN	<p>Recommend that Ravenswood District Centre is extended to include the Site 1 (lp141a) frontage plot. The rationale includes:</p> <ul style="list-style-type: none"> - Geographical proximity to existing centre; - Lidl require a new and larger store due to inadequate parking, limited store sales area and no opportunities to extend. The Site 1 plot can accommodate this. - Lidl will seek to ensure the building avoids long term vacancy and is re-occupied as soon as possible. <p>We would welcome discussions with officers if the principle of this extension to the District Centre is acceptable.</p>
25692	Boyer on behalf of East of England Co-Operative Society	<p>The new District Centre within the plan period at Sproughton Road is supported. The location of the proposed Sproughton Road District Centre has changed from the adopted Local Plan and is now identified as being sited on the Boss Hall Business Park in land within the Society's ownership. The principle of a district centre in this location is supported and A1/ A3 commercial/ retail uses akin to a district centre are proposed through the Society's current planning application, reference 18/00948/OUTFL.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25636	Private individual	<p>With the rise in online shopping and supermarkets focusing on 'local' stores District centres do not have the same importance that they once did. Nacton Road District Centre as identified on the proposal map extends too far, resulting in a scattering of land uses down the street. Size should be retracted to promote empty units within the District Centres.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

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

The Nacton Road District Centre has not been retracted in size. This District Centre only had 3 of the 40 units recorded as being vacant at the time of the last District and Local Centre Survey (October 2018). The focus on 'local' stores by supermarkets is anticipated to increase demand for smaller units in District and Local Centres. In conclusion, the Nacton Road District Centre is considered to be healthy and functioning well and should not be retracted in size.

The position of the proposed Sproughton Road District Centre has been moved. IP090 has been given consent for a large supermarket use. Subsequently, it was decided to move the location of the proposed district centre to an alternative location. The indicative location has been moved to reflect the recently approved planning permission (18/00948/OUTFL) for commercial and retail uses at the Dairy Crest site on Boss Hall Road

The Ravenswood District Centre has not been extended to include Site IP141a(1). Site IP141a(1) is allocated for employment use in both the adopted (2017) and emerging Local Plans. Of the 56 employment sites surveyed as part of the Employment Land Supply Assessment (2018), the site scored 23 points out of 30 and the highest scoring site was 25 out of 30 (although this was for leisure-related employment not B-class). It was ranked 1st out of 19 in terms of the allocated/mixed-use allocated B-class employment sites (i.e. the sites that have not yet been developed) and second in terms of all allocations (including non-b class). The remainder of IP141a(3) has also recently been partially developed for a storage facility and the remainder of the land has an extant planning permission for employment uses which is understood to be implemented in 2020. Furthermore, the Retail and Commercial Leisure Study (2017), did not identify a strong demand for further convenience retail floorspace in the Borough and the future demand would be met by the Ipswich Garden Suburb convenience floorspace provision. Overall, given the high scoring of the employment site and limited demand for convenience retail floorspace, it is not considered appropriate to extend the Ravenswood District Centre to cover this site.

66.DM31 (formerly DM30) – Town Centre Uses Outside the Central Shopping Area

Representations	Comments	Object	Support
1		1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25694	Boyer on behalf of East of England Co-Operative Society	The Society generally supports the approach in Policy DM31 to Town Centre Uses outside the Central Shopping Area. However, Policy DM31 should also acknowledge that district centre locations may also be suitable for non-retail town centre uses (such as leisure) to promote a mix of uses within the district centres.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

The policy has not been amended to acknowledge that district centre locations may also be suitable for non-retail town centre uses. The policy, as worded, is set out to align with Paragraphs 85 and 86 of the National Planning Policy Framework (NPPF) (2019). The NPPF sets a clear expectation that main town centre uses should be located in town centres first. Any proposals for non-retail town centre uses outside the town centre will need to comply with the sequential test of the NPPF Paragraph 86. Consequently, it is not appropriate to include district centre locations as suitable as it would be contrary to the NPPF.

67.DM32 (formerly DM31) – Retail Proposals Outside Defined Centres

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25726	Freeths LLP on behalf of AquiGen	Object to criterion (a) which requires consideration of the appropriateness of scale when assessing out-of-centre retail proposals. The use of 'scale' is no longer recommended by national guidance and is therefore inconsistent with NPPF paragraphs 86 and 89 which only require an applicant to demonstrate compliance with the Sequential Approach and Impact. As identified at paragraph 89 b), scale forms part of the consideration of Impact.

		There is no requirement to demonstrate appropriateness of scale, separate from impact. A requirement to demonstrate scale has not been identified by the Evidence Base as a retail policy requirement. Remove criterion a.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

Criterion A has not been removed from the policy. The revised National Planning Policy Framework (NPPF) (2019) paragraph 89(b) is worded consistently with the previous NPPF (2012) paragraph 24 in terms of applicants and local planning authorities demonstrating flexibility on issues such as format and scale. The wording of 'the appropriate scale of development' was deemed sound in the previous Local Plan examination. Therefore, given the consistency between the revised NPPF and previous NPPF it is not appropriate to amend this.

68.DM33 (formerly DM32) – Protection of Employment Land

Representations	Comments	Object	Support
4		2	2

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25997	Suffolk County Council	Paragraph 9.32.1 (now 9.33.1), in clarifying that waste uses can come forward on employment allocations when compatible with adjacent uses, is also helpful in respect of relocating the Ipswich Household Waste Recycling Centre. It is also consistent with emerging policy WP3 of the SMWLP, which clarifies that land allocated for B2 and B8 uses are appropriate employment allocations, subject to emerging policy GP4 which considers the impacts of proposals on the local environment.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25887	Associated British Ports	ABP supports the safeguarding of the operational areas of the Port through their definition as Employment Areas E9 and E12 on the Policies Map and under Policy DM33. ABP welcomes the recognition at para 9.32.6 (now 9.33.6) of the need for ABP's specific operational requirements and consents and licences for the handling and storage of hazardous substances to be taken into account in any development planned in the vicinity of these areas.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25720	Freeths LLP on behalf of Aquigen	As NPPF paragraph 120 relates to allocated land and recommends the use of the no reasonable prospect test, to ensure consistency with the NPPF, we recommend Policy DM33 is amended to allow the test to be applied to defined Employment Area land. This will ensure the Plan is consistent with national guidance and adequately flexible to deal with changing market signals and needs. This is particularly important given the surplus allocation position compared with need as identified in our assessment. There is ambiguity regarding paragraphs 9.32.2 (now 9.33.2) and 9.32.4 (now 9.33.4) in relation to the "no reasonable prospect test" and employment area land.
25695	Boyer on behalf of East of England Co-Operative Society	The protection of the Boss Hall Business Park is generally supported. However, the policy is currently considered to be too restrictive. Paragraph 9.32.7 (now 9.33.7) defines appropriate employment-generating sui generis uses and excludes any sui-generis use that includes retain and leisure as another other than an ancillary use. Retail and leisure uses are employment generating in

		<p>themselves and can assist in underpinning the vitality and attractiveness of employment areas, and so the policy is too restrictive. The Site allocations DPD makes reference to a new retail allocation at Boss Hall Business Park.</p> <p>Strict long-term protection for only B-Class uses would be inappropriate.</p>
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The following made no comments in response to this issue.

Parish and Town Councils
Members of the public

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

Paragraph 9.33.4 of the reasoned justification has been amended to state that “in accordance with policy” to make clear that the no-reasonable prospect test only applies to land outside defined employment areas. This is because it is not clear that this is the case in the originally drafted wording and needs to align with the provisions of the policy wording.

The policy has not been amended to allow for the no reasonable prospect test to be applied to protected employment land. The preparation of the Preferred Options Local Plan Review has been undertaken in accordance with NPPF Paragraph 120. The Draft Strategic Housing and Employment Land Availability Assessment (2019) considered protected employment land when assessing site deliverability and this was formulated on the evidence obtained in the Employment Land Supply Assessment (ELSA) (2018). The protected employment areas that are included in the Local Plan Review scored highly in the ELSA., The inclusion of these protected employment sites could affect the Council’s ability to achieve its employment objectives and jobs targets.

The definition of appropriate employment-generating sui-generis uses has not been amended to include retail and leisure uses. It would be inappropriate to do this because it would conflict with Preferred Options Policy DM32 regarding out-of-town retail if either of these uses were larger than ancillary uses. The loss of employment land, whether in existing employment use or within a defined Employment Area, could affect the Council's ability to achieve its employment objectives and job targets. Land and buildings in employment use may also come under pressure from other forms of development that tend to have higher values such as retail and leisure. As a general principle therefore employment uses should not include non-ancillary retail and leisure uses.

69. DM34 (formerly DM33) – Delivery and expansion of Digital Communications Networks

Representations	Comments	Object	Support
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0	0	0	0
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The policy and supporting text have been amended to future proof the delivery of new technologies that may not be known now but could potentially come forward in future stages of the plan period. The additional wording will ensure that Ipswich is not limited to the delivery of old technologies if new ones are developed.

70. Chapter 10 – Implementation

Representations	Comments	Object	Support
5	0	4	1

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25611	Westerfield Parish Council	<p>Westerfield Parish Council comment on Table 8B:-</p> <p>Re. Fonnereau Way</p> <p>The Parish Council are concerned that Network Rail are seeking to close the at-grade pedestrian rail crossing on Fonereau Way. This is an important footpath and the Parish Council consider the cycle /pedestrian bridge at this location in Table 8B as important both to benefit the Country Park as part of Ipswich Garden Suburb but also to provide access to countryside in Westerfield and beyond.</p> <p>Re. Off-site junction improvements and Traffic Management in Westerfield.</p> <p>The Parish Council support these requirements to reduce the effect of additional traffic in Westerfield</p>

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25607	Department for Education (DfE)	It would be useful if the Infrastructure Delivery Plan included evidence of how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) over the plan period. This would help to demonstrate more clearly that the approach to the planning and delivery of education infrastructure is justified.
25985	Suffolk County Council	<p>Development proposed in the Plan will generate significant demand for additional early education places.</p> <p>The Plan needs to include a strategy for securing land and appropriate contributions towards build costs. This will need to include allocations in local plan policies and approximate costs within an infrastructure delivery strategy, for the purposes of estimating developer contributions. An indicative approach is included as an appendix to this letter (appendix 2).</p> <p>The County Council would appreciate discussion of the initial/indicative approach and how it will relate to local plan allocations and agreement of delivery mechanisms.</p>

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25651	Northern Fringe Protection Group	<p>Transport modelling shows severe capacity issues at many key junctions in and around Ipswich that will result in gridlock but there are no transport infrastructure projects included in the Infrastructure Tables to resolve capacity constraints. This is especially the case in and around the town centre, A14 and A1214.</p> <p>Some form of northern relief road is clearly required and along with improvements to over-capacity junctions such as Henley Road/ Valley Road and needs to be included in the Infrastructure Tables and delivered for full development of the Ipswich Garden Suburb to be allowed.</p>

25659	Northern Fringe Protection Group	<p>There are still no firm proposals for new sewerage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.</p> <p>The effectiveness of the Core Strategy to deliver both employment and homes growth, including the IGS, could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the plan period and plan for its provision.</p> <p>The three Anglian Water improvements need to be added to the Infrastructure Table.</p>
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The following made no comments in response to this issue.

Developers and Landowners

Members of the public

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

Chapter 10 has been amended to change the formatting of Table 8A. The new table provides greater detail on the infrastructure requirements. This includes early years and education requirements based on advice from Suffolk County Council, and transport requirements for the strategic and local networks, linking to the Suffolk County Council Transport Mitigation Strategy where appropriate. In relation to sewerage infrastructure at Ipswich Garden Suburb, no change is proposed, because the responsibility for its provision lies with Anglian Water and they are looking at what work will need to be carried out to accommodate the IGS development. General information about water supply and foul sewerage has been added to Table 8A to reflect input from Anglian Water.

Supporting text has been added to section 10.5 of Chapter 10 to explain the strategic context for infrastructure provision at the LEP and County level, for example, and refer to the Recreational disturbance Avoidance and Mitigation Strategy and its relationship to this section of the Plan.

A change to Table 8B aligns it with the wording of policy CS10 in relation to healthcare provision, on the advice of the Clinical Commissioning Group.

71. Chapter 11 – Key targets associated with Part B

Representations	Comments	Object	Support
6	0	6	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25959	Environment Agency	The key targets of the plan are outlined on pages 155 to 159. We welcome the inclusion of objective 1 which aims for high standards of design in new development and ensures that development is sustainable, environmentally friendly and resilient to the effects of climate change. The objective could be further enhanced by referencing property level protection to this objective.
25960	Environment Agency	Objective 1 We support the use of SuDS in this objective however it is important to be clear that SuDS, if soaking into the ground, may not be suitable at some sites. Non-infiltration SuDS should be used where contamination is present or groundwater levels are too high.
25961	Environment Agency	We are pleased to see reference to the Ipswich tidal barrier in objective 7. The objective states that the implementation of the barrier is due by the end of 2019. We are pleased to say that construction is now complete and the barrier is operational. Therefore, this objective should be updated accordingly.
25962	Environment Agency	Objective 8 states that there is no net loss of natural capital by 2036. This should be more ambitious to reflect net gain principles in accordance with paragraph 170 of the NPPF. Any impact on biodiversity from human activities and development need to be balanced by at least equivalent gains for biodiversity.
25963	Environment Agency	The current objectives do not count for all of the environmental impacts of development in the borough. EA suggests the following: 1 Ensure the protection and enhancement of the environment by endeavouring to meet the objectives of key environmental legislation. This should include the promotion of measures supporting climate change adaptation, delivery of air quality targets, delivery of WFD objectives and flood risk management, including SuDS and water quality. 2 To allow sustainable growth, ensure adequate utilities infrastructure is provided in a timely and efficient manner, ahead of the

		occupation of developments in order to safeguard the local water environment.
25964	Environment Agency	In addition, EA would also welcome the addition of wording stating that areas of brownfield land be brought back to beneficial use in accordance with NPPF paragraph 118 section c.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The Key targets have been amended to reflect those set out in the objectives chapter. The objectives have been rationalised under subject headings, which better relate to the key issues across Ipswich and Suffolk. The indicators have been updated to ensure the data is obtainable and targets have been rationalised to ensure they are outcome focussed and reflect the highest priorities in the plan.

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

The Council supports efforts to improve flood protection through the installation of individual property level flood protection measures. However, many permanent flood protection structures are classed as permitted development, not requiring planning permission. As such, the Council has no reliable mechanism for monitoring the number of properties incorporating property level flood protection.

The Council acknowledge that some previously used sites will have contaminated soils. SuDS can still be incorporated, although infiltration SuDS may not be suitable as concentrated ground flow could lead to water-borne contaminants being transferred to deeper soils or sensitive aquifers. Accordingly, SuDS on contaminated land should be lined and designed to attenuate water on or near the surface. The Council intend to amend objective 4, indicator 3, to make clear that infiltration SuDS may not be suitable on some sites. The Council will also consider amending Policy DM4 Development and Flood Risk.

Objective 4 has been amended to reflect the fact that the barrier is now complete and operational. Going forward the Council will monitor the flood and coastal erosion risk management.

The principle of biodiversity net gain is promoted in the Government's 25 Year environmental plan and is strongly referenced in terms of planning policy and

decision taking in the NPPF 2019. It is proposed to update objective 9, target 4, reflect the hierarchy of environmental protection now set out in the NPPF. This change also takes account of actions and recommendations in the HRA.

72. Chapter 12 – Monitoring and Review

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No representations received. No significant changes.

73. Part E – Appendices

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26012	Suffolk County Council	SuDS Definition (page 178): It would be helpful to extend this definition of SuDS to state that SuDS are used to attenuate and treat runoff.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The glossary has been updated for numerous changes, including the definition of SuDS.

74. Appendix 1 – A List of Policies Included in this Document

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

Updated to reflect change in policy numbers.

75. Appendix 2 – Saved Policies that are superseded by the Core Strategy and Policies Development Plan Document

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No changes.

76. Appendix 3 – Community Facilities in District and Local Centres

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No changes.

77. Appendix 4 – Activities or services relevant to each planning standard charge heading

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25802	East Suffolk and North Essex NHS Foundation Trust (ESNEFT)	Under 'Health and Emergency Services' add, including acute and general healthcare requirements to 'Health Facilities'.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

Health and emergency services definition updated.

Water utility clarified to include “potable and wastewater supply” following comments from Anglian Water on other policies.

University Campus Suffolk changed to “The University of Suffolk”.

78. Appendix 5 – Ipswich Standards for the provision of open space, sports and recreation facilities

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25573	Ipswich Canoe Club	This part of the Plan is focused on land-based recreational/ sports facilities (nothing water/

		<p>river based). Recommended to include more statement of vision based around ongoing engagement with relevant local people and groups to achieve better recreational, leisure and economic use of the Rivers.</p> <p>River portages, facilities and parking could be better to encourage more use.</p> <p>Better flow of the river Gipping would reduce weed on the river, requiring co-ordination with Environment Agency.</p> <p>Better access between the Orwell and Gipping.</p> <p>Support local community projects.</p> <p>Vision could be more imaginative (e.g. Norwich, Cambridge or Upper Thames?).</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

Reference to water-based activities added.

Table number changed from 10 to 9.

79. Appendix 6 – Glossary

Representations	Comments	Object	Support
1		0	0

No comments were made on this.

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

Although not in response to any comments, some changes to the glossary have been undertaken.

A definition for Biodiversity Net Gain has been included to respond to updates to national Planning Practice Guidance.

A definition for Blue Corridors has been added in light of additional emphasis on blue corridors in policy DM10. Similarly, a definition of Green Corridors has been included as well.

The definition of Gypsies and Travellers has been amended to provide further clarification. In addition, a term and definition for Travelling Showpeople has been inserted as well.

A term and definition for “Landmark Building” has been added to the glossary. This is to assist with the interpretation of the site sheets which have been updated to include urban design terms such as this.

The definitions and terms for the retail zones (primary, secondary and specialist) have been amended to reflect the changes to policy DM27.

A term and definition for SANGs has been added in light of the specific reference to SANGs that has been inserted into Policy ISPA4 and the site sheet for ISPA4.1.

The definition for SuDS has been amended to explain that typically this includes the treatment of run-off from development sites.

80. Appendix 7 – Marketing requirements

Representations	Comments	Object	Support
1		1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25723	Freeths LLP on behalf of Aquigen	<p>Welcome the introduction of marketing requirements generally but suggest amendments:</p> <ul style="list-style-type: none"> - Paragraph 2.1; agreement with the Council before marketing is carried out is unnecessary. - Paragraph 2.5; providing names and contact details raises potential confidentiality issues. A simple schedule noting the origin of an enquiry and reason is sufficient. - Paragraph 2.6; A commercial site is not generally marketed at a set value and to agree this with the Council is unprecedented and unreasonable.

The following made no comments in response to this issue.

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

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

Marketing Strategy amended to reflect comments.

DRAFT

Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review

Representations (Overall)	Comments	Object	Support
160	46	87	27

1. Foreword

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No significant changes. No comments received.

2. Chapter 1 – Introduction

Representations	Comments	Object	Support
2	0	2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25860	Save our Country Spaces	SOCS suggest the Final Draft Local Plan fails the tests of soundness as it is not positively prepared, not justified, not effective and not consistent with national policy. The Climate Change agenda (NPPF10) is insufficiently addressed and proposals are contrary to this. The HRA and SA have inadequately and inaccurately assessed the effects of the plan. Serious adverse effects, as required under NPPF 6 - 17, have not been properly identified. NPPF-11 has not been adequately taken into account.
25869	Save our Country Spaces	Suggest the Final Draft Local Plan fails the tests of soundness as it is not positively

		<p>prepared, not justified, not effective and not consistent with national policy. The Climate Change agenda (NPPF10) is insufficiently addressed and proposals are contrary to this. The HRA and SA have inadequately and inaccurately assessed the effects of the plan. Serious adverse effects, as required under NPPF 6 - 17, have not been properly identified. NPPF-11 has not been adequately taken into account.</p>
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The following made no comments in response to this issue.

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

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

The Local Plan as a whole is considered to meet the tests of soundness. It is consistent with national policy, positively prepared, justified and effective.

The climate change agenda is sufficiently addressed as the Council have planned positively in terms of biodiversity net gain and retained policy mechanisms such as DM1 (Sustainable Construction) and DM2 (Decentralised Renewable or Low Carbon Energy) to support this.

The NPPF does not require Local Plans to define ‘serious adverse effects’. Paragraph 32 of the NPPF refers to ‘significant adverse impacts’ but only in the context of the sustainability appraisal and the need to avoid impacting on the economic, social and environmental objectives. The Sustainability Appraisal has assessed the Local Plan against these objectives in accordance with the NPPF.

The Habitat Regulations Assessment (HRA) and the Sustainability Appraisal (SA) are accurate and robust in terms of their assessments of the Local Plan.

The Council believes the Local Plan to be in accordance with paragraph 11 of the NPPF in relation to the presumption in favour of sustainable development.

The plan needs to be viewed in the round. This document objection is only one element of the plan. The Vision and Objectives set out in the Core Strategy of the Plan set out the strong commitment of the Council in relation to climate change.

Paragraph 1.10 has been amended to confirm that the revised Local Development Scheme was adopted in February 2019.

3. Chapter 2 – The Ipswich Local Plan

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Statutory Consultees

Developers and Landowners

Members of the public

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

No changes arising from comments as no comments made.

Paragraph 2.8 lists the key elements of the local evidence base. However some of the documents that it references have been updated and therefore minor amendments to this have been made.

4. Chapter 3 – Vision and Objectives

Representations	Comments	Object	Support
5	0	0	5

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25804	AONB	The AONB team welcome the inclusion of the following objectives in the emerging Core Strategy & Site Allocations Review DPDS: Objective 5 Opportunities shall be provided to improve strategic facilities in Ipswich by: - Extending the strategic greenspace, ecological network and canopy cover
25805	AONB	Objective 6 To improve accessibility to and the convenience of all forms of transport and achieve significant modal shift from the car to more sustainable modes. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative

		'green' non-vehicular access around the town and urban greening of existing routes. Specifically: - Comprehensive, integrated cycle routes should be provided; and - Ipswich Borough Council aspires to an enhanced public transport system.
25806	AONB	Objective 7 - Enhanced flood protection including a tidal surge barrier to be in place to protect the town's existing and expanding communities from the threat of tidal flooding.
25807	AONB	Objective 8 -To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and conserve and enhance the historic environment and landscape character of Ipswich, including historic buildings, archaeology and townscape.
25808	AONB	Objective 11 -To improve air quality and create a safer, greener, more cohesive town.

The following made no comments in response to this issue.

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

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

For information, the vision and objectives have been amended to align with the changes made to the Core Strategy DPD vision and objectives. Please see the assessment of the Core Strategy section for a list of the changes.

5. Chapter 4 – Site Allocations

Representations	Comments	Object	Support
13		12	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25602	Department for Education (DfE)	The DfE requests that a site is also allocated for Central Ipswich Free School which is planned to open on the Former Co-Op

		Department Store site on Carr Street (IP4 1HB). This primary school will have two forms of entry providing education for 3 -11 year olds. We are happy to provide further information to help add detail to this site allocation in the next iteration of the local plan.
25604	Department for Education (DfE)	Table 8B (chapter 10) of the Core Strategy provides further details of the schools required in Ipswich Garden Suburb. The next version of the Local Plan should include similar details for all schools within the site specific policies so that all stakeholders are clear about the site requirements. Where possible the next version of the plan should also seek to clarify requirements for the delivery of new schools, including delivery time to support housing growth, the minimum site area, any preferred site characteristics and any requirements for additional land safeguarding. The Milton Keynes draft policy CC7 is a good example.
25605	Department for Education (DfE)	The site specific policy requirements need to be set out clearly, informed by robust evidence of infrastructure need, so that they can be accurately accounted for in the viability assessment of the local plan (to ensure that the total cumulative cost of all relevant policies will not undermine deliverability of the plan), and in the price paid for land by developers and other parties.
25606	Department for Education (DfE)	While it is important to provide certainty to developers, retaining flexibility is also necessary given that the need for school places can vary over time. The DfE therefore recommends considering the following in the next version of the Plan: Site specific requirements for developer contributions to enlargements of existing and new schools at application stage. Requirements to deliver schools on some sites could change in the future if it were demonstrated and agreed that the site had become surplus to requirements. Further details regarding establishing new schools is provided in the full text.
25981	Suffolk County Council	Detailed comments on archaeological constraints have, in the past, been included on the site sheets. The County Council would appreciate a discussion about reflecting detailed archaeological requirements as site-

		specific policy, as has become standard practice in other parts of the county. See Appendix 4 for site-specific comments in respect of public rights of way.
25996	Suffolk County Council	The Waste Core Strategy and SMWLP protect permitted and proposed waste facilities from being prejudiced by development within their proximity. This is defined as 250m from the boundary of the waste site. Table 1 (Appendix 3) shows the proposed Ipswich allocations that fall within this. At planning application stage the developer of these sites should demonstrate that development does not prevent the facility from operating, and that the users of the development are protected. It is recommended that this requirement is included in the text for these sites. This also applies to minerals facilities.
25999	Suffolk County Council	The majority of the allocations in Ipswich are within the Minerals Consultation Area (MCA), meaning that the County Council would normally seek to protect the resources on these sites. However most of these are too small to trigger policy MP10 in the SMWLP. Sites larger than five hectares within the MCA are shown in table 3 (Appendix 3). The table also identifies the predicted area of actual mineral in the site. It is recommended that text is added to the plan explaining that use of minerals on site may be required by the County Council, as stated in the SMWLP.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25813	AONB	The relevant sections in the Site Allocations and Policies Review document (IP150b- SP7, IP150c - SP5, IP150d- SP2, & IP150e- SP2) and Policies Review document should be amended to identify the need for a full assessment of impacts of the proposed development on the Natural Beauty and Special Qualities of the AONB. This is necessary to help inform mitigation needed to offset the worst impacts. The AONB team would be happy to discuss

		the scope of an AONB impact assessment at the appropriate stage of the planning process.
25814	AONB	We note that a masterplan is to be prepared for these sites (IP150b- SP7, IP150c - SP5, IP150d- SP2, & IP150e- SP2) along land at Airport Farms Kennels site which is welcomed. The AONB team would like to be involved in any masterplan meeting or workshops and consulted on future iterations of the masterplan as it evolves.
25842	Ravenswood Environmental Group	No credible consideration of the cumulative impacts of development at the six sites at Ravenswood on; traffic, residential amenity, various protected sites (including Nature Reserves and an SPA), air quality, noise and the environment. Such a large centre of development needs a clear policy environment relating to access. The plan fails to satisfy the requirements of paragraph 16d of the NPPF. The plan is not justified or positively prepared. It is not effective as there is no clarity as to what is expected of proposals. The plan is trying to allocate a large site via "stealth", without appropriate assessment.
26115	Suffolk Constabulary	In response to your request for feedback on 'Site Allocations and Policy (incorporating IP-One Area Action Plan) Development Plan Document Review Preferred Options', it is requested that you include a requirement that all new and refurbished building proposals are required to be carried out in accordance with Secured By Design (SBD) standards following consultation with the local Design Out Crime Officer (DOCO). This will ensure that every opportunity to design out crime has been taken at the earliest opportunity in the planning process and improve the quality of the built environment for those who live, work, study-in and visit Ipswich.
25633	Suffolk Wildlife Trust	We recommend that any sites of significant wildlife value are not allocated for development and that where sites are allocated adequate mitigation measures are secured as part of the allocation policy.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25968	Boyer on behalf of Austin Street Projects Ltd	<p>The land at 68a Austin Street is vacant and secure. There is an intention to redevelop the site to deliver a high quality residential development, comprising predominantly of affordable housing.</p> <p>The site was submitted to the 2017 'Call for Sites' and it has been assessed within the draft SHELAA as being suitable, available (immediately) and achievable (within 5 years) for residential development (SHELAA Ref. IP309).</p> <p>Given the positive assessment through pre-application discussions, as well as through the draft SHELAA, the land at 68a Austin Street should be included as an allocation for residential development within the emerging Local Plan.</p>

The following made no comments in response to this issue.

Parish and Town Councils
Members of the public

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

The primary school allocation at Carr Street has been specifically listed in Table 5 of Policy SP7 under site IP048a. Table 8A of the Core Strategy Final Draft sets out the infrastructure requirements that are likely to be needed over the plan-period.

The Ipswich Local Plan Review has been subject to a Habitats Regulation Assessment (HRA) and the site sheets have been updated to take account of the actions and recommendations of the HRA.

The Council has commissioned a Wildlife Audit Update. The results of this have been fed into the site selection and site sheets.

The archaeological comments on individual sites have been incorporated into the site sheets where appropriate.

The IP150 sites have considered the impact on the nearby AONB and this is highlighted in the site sheets. In addition, the Council will seek to involve the AONB Unit in any future masterplanning work.

The air quality and transport modelling work which is ongoing has considered the cumulative impacts of development on the surroundings, which includes the

allocations at Ravenswood. This also considers the cumulative impact of likely development in the neighbouring authorities.

68A Austin Street (IP309) has been included as an allocation.

A new site has been identified at the corner of Hawkes Road and Holbrook Road (IP125) and this has been added to Policy SP1.

The BT Depot site (IP129) has been removed from SP1 and transferred to SP7 as it is now allocated for a Special Educational Needs and Disability (SEND) school.

Sites IP028b, IP045, IP052 and IP226 have been transferred to new Policy SP4 (Opportunity Sites).

The Suffolk Retail Park site (IP346) has been deleted as it has recently been redeveloped and occupied as a retail use and it is therefore considered unlikely that it will be deliverable for residential development over the plan period.

Internal comments from the Urban Design and Conservation Team have been considered and have influenced the site sheets where appropriate.

6. Policy SP1 – The Protection of Allocated Sites

Representations	Comments	Object	Support
2	0	1	1

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25888	Associated British Ports	Support the safeguarding of sites, subject to the recognition that where sites (such as the Island Site) are in existing use and are allocated for alternative use(s), redevelopment will be dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for redevelopment, such sites should reasonably be able to continue in their existing use. In the case of the Island Site, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26061	Barton Willmore on behalf of Telereal Trillium	Telereal is supportive of this policy as IBC has allocated the entire Bibb Way site for residential uses after the prior approval was granted in 2018. The Bibb Way Site is vacant and ideally situated for residential uses, given its proximity to a number a services and facilities in and around Ipswich town centre. It is also in keeping with the surrounding area, which is mainly residential and comprises a mixture of houses and flats.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

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

The wording of SP1 has not been amended to state that redevelopment will be dependent on commercial viability. This is because it is not deemed necessary to explicitly state this as it is reflected in the likely delivery timescale aspect of the tables in the Site Allocations DPD and the Strategic Housing and Economic Land Availability Assessment (SHELAA). For example, the Island Site (IP037) has been included as a 'long' timescale allocation to reflect the master planning and infrastructure delivery for this which will then inform the viability. Allocations will be revisited under future Local Plan reviews which will need to be informed by the latest SHELAA and take into account commercial viability.

7. Policy SP2 – Land Allocated for Housing

Representations	Comments	Object	Support
4	0	4	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25965	Environment Agency	Paragraph 4.12 on page 25 outlines the requirement for the sequential approach to sites in line with paragraph 158 of the NPPF. The paragraph suggests that development has been sequentially sited and the exception test has been applied as well. It is however not clear how this has been achieved. We are

		currently reviewing the Sequential and Exception Test statement and will advise of any further work required.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25812	AONB	Sites IP150b - IP150e are being proposed for mixed use residential, leisure and employment developments. These sites sit wholly within the Suffolk Coast & Heaths AONB. The site sheets make no reference to this in the constraints section. They should be modified to reflect this.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25925	Turley on behalf of Pigeon Investment Management Ltd	Pigeon consider that the majority of the sites that the Council has proposed for residential allocation are subject to significant constraints that could delay, or indeed, ultimately prevent their delivery. Pigeon do not consider the approach of relocation of existing uses, where there is no reassurance that these can be successfully located elsewhere, as an appropriate strategy for delivering housing in Ipswich. Pigeon therefore strongly object to this approach and suggest that the Council follow their Duty to Co-operate, of working with neighbouring authorities to deliver a proportion of their housing requirements.
26097	Salter and Skinner Partnership	Development (113 dwellings) at Bourne End Nursery is appropriate on brownfield site. Supports the government objective to boost housing on previously developed sites. Council does not have 5 year housing land supply. Sites in flood zone 2 can be developed for housing if there are no sequentially preferable sites, subject to exception test being met. There aren't other suitable sites to ensure the Borough has a suitable range of sites. The development can be made safe for its lifetime. Only minor shortcoming is partial-

		<p>flooding of road but not dangerous enough for refusal. Allocate site for housing. (see appendix accompanying reports)</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Members of the public

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

The plan strategy and many of the development allocations remain the same as the adopted Local Plan. Since its adoption, the tidal barrier has been installed to protect central Ipswich from tidal flooding. An update of the Council’s Strategic Flood Risk Assessment is currently underway and will result in updated sequential and exception test statements being published alongside the regulation 19 version of the plan.

The AONB Unit have since confirmed that the IP150b – IP150e sites are not within the AONB.

The Council is focusing more resources onto site delivery, as evidenced through the draft Housing Delivery Action Plan published on 16th August 2019. The Council has also re-reviewed the proposed site allocations since the preferred options draft plan to update site constraints information and reflect feedback received, where appropriate. As a result of the additional site reviews, a new category of ‘opportunity sites’ is proposed. These are sites which the Council wishes to see regenerated for residential-led development, but where both significant further work is needed in relation to existing uses, and the sites are not in the Council’s control as landowner.

The Bourne End Nursery site is being assessed through a wider Strategic Flood Risk Assessment and this will inform whether or not the site is considered to be safe in terms of flood risk. Until such a time as this work deems the site to be safe, the site will not be included.

Reference to the site sheets has been made in the policy wording to given them greater emphasis and ensuring that developers are aware both of constraints and Council vision for site development.

A new concept called “opportunity sites” has been introduced. This change was made to encourage the regeneration of important, central, brownfield and in some cases long-allocated sites, whilst reflecting the constraints relating to site ownership (private) and current occupation (in use). The constraints mean that the sites may not come forward over the plan period. If this is the case, this approach to allocation will ensure that they do not artificially inflate the housing land supply.

8. IP003 – Waste tip and employment area north of Sir Alf Ramsey Way

Representations	Comments	Object	Support
2		2	

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25967	Environment Agency	IP003 - HWRC and employment area north of Sir Alf Ramsey Way. The site currently holds an environmental permit which will need to be surrendered should the area be redeveloped. If controlled waste is to be removed, the operator must ensure a registered carrier is used to convey the waste to a suitably permitted facility. All documentation to be kept in accordance with regulations. Excavated materiel arising from remediation or re-development works can sometimes be classified as waste. Further guidance on how waste is classified, best practice for handling, transport and disposal can be found on our waste pages.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25553	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping River, please consider provision of 'portage' easy river access and facilities including possible canoe/ kayak/ boat storage facilities within IP003 Land for Residential Use. However, noting that this end-section of the River Gipping, bordering IP003, just before the weir has fairly static and relatively unclean water, it will be necessary to have improved schemes to clean up this river section and minimise refuse and food waste being deposited here, in order to make this section more amenable to recreational and leisure use.

The following made no comments in response to this issue.

Parish and Town Councils**Developers and Landowners**

Members of the public**How these comments have been taken into account in the Final Draft Local Plan:**

The site sheet has been amended to reflect the proposed changes from the EA. This site is not considered suitable for water recreation because of the proximity of the local nature reserve and county wildlife site. Other changes include reference to a 10m River Corridor Buffer where no development should take place; the recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development; design and conservation advice has also been included, in reference to the Valley Ipswich Urban Characterisation Study SPD and the need for master planning. The site may also need to include early years provision subject to flood risk considerations.

9. IP004 – Bus Depot, Sir Alf Ramsey Way

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This site is allocated for mixed residential & B1 office use; historic depot to be retained and converted as part of B1. The site sheet has been updated to better reflect regulations about the removal of controlled waste when the site is redeveloped. It also now contains more information regarding potential archaeology to reflect the adopted Archaeology SPD and the 10m Blue Corridor required by Natural England. There is in addition more on design requirements to reflect the location and context of the site and river walk requirements.

10. IP009 – Victoria Nurseries, Westerfield Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No changes made as no representations received. However, additional design advice added to reflect the two active frontages of the site.

11.IP010a – Co-Op Depot, Felixstowe Road

Representations	Comments	Object	Support
7		6	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25600	Department for Education (DfE)	The DfE strongly supports the allocation of site IP010a which includes 25% of the site to be safeguarded for an extension to Rosehill School (also referenced in Policy SP7).
26149	Suffolk County Council	Desk-based assessment has been undertaken for this site.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25677	Boyer on behalf of East of England Co-Operative Society	Supports allocation for residential development, but objects to the detail of the allocation – the proposed density of a future scheme is considered very low for a sustainable location and the abnormal costs associated with remediating the site. A mixed-use scheme, comprising residential development with additional community uses, such as a doctor's surgery is suggested. This should be reflected in the Council's Site Allocations Document.
25678	Boyer on behalf of East of England Co-Operative Society	The Society do not object to disposal of part of the site to the school to the north, however, such a sale needs to reflect the abnormal costs associated with the site, including the presence of contamination, and in turn to acknowledge the impacts on viability of proposals for development of the site as a

		whole as referred to in submission reference 25677
25679	Boyer on behalf of East of England Co-Operative Society	<p>The Society objects to the following wording in this policy's supporting text "cycle and pedestrian bridge to link the District Centre with the housing to the north of the railway". The provision of land and the cost associated with such infrastructure is not considered viable when acknowledging the abnormal costs associated with the site, including the presence of contamination.</p> <p>As currently worded, it is considered that this aspect of the policy is not justified as it fails to properly consider viability and therefore fails to meet the tests of soundness, as required by paragraph 35 of the NPPF (2019).</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25727	Private individual	<p>It should include a pedestrian route from Hines Road to Derby Road near Rose Hill School. Many children and their parents walk along Derby Road to the school. The road is often busy and the pavement is narrow. The provision of the new pedestrian route would make it a pleasanter journey and there would be less chance of an accident. It would also reduce exposure to traffic pollution.</p> <p>Recommend a pedestrian route from Felixstowe Road near King Edwards Road to close to the school.</p> <p>An additional benefit is that it would be pleasanter for people walking to Derby Road Station.</p>
25716	Private individual	<p>When this area is redeveloped I would consider it prudent to include a footpath from Hines Road to connect to Derby Road at/near Rose Hill School for the obvious benefits to the safety of parents and children.</p> <p>I would consider an access road to the redevelopment adjacent to the school to be an error, due to safety reasons and congestion (Any Road link by-passing the Felixstowe Road/ Derby Road junction would become a rat-run.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

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

The requirement in the policy is not to actually provide the cycle and pedestrian bridge to the housing north of the railway rather to reserve the land which is far less onerous and should not adversely affect viability.

The density of 45dph is considered to be appropriate due to the unique site constraints (noise from railway, the need to avoid over-looking of school etc).

The details of the sale of land for the expansion of Rosehill School is a matter of negotiation between Suffolk County Council and the East of England Co-Op Society over which the Borough has no influence.

The comments relating to Archaeology in the site sheet have been updated to reflect comments from the Archaeology Service Unit.

This is a key pedestrian and cycle desire line, and the alternative routes are not attractive or convenient. The land is required to allow for a bridge to come forward in the future.

In addition, there is additional design advice provided in the site sheet and reference to the Wildlife Audit 2019.

12.IP010b – Felixstowe Road

Representations	Comments	Object	Support
1		1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25718	Private individual	I would suggest that the footpath requested for IP010a (see separate representation) be extended to also exit on Felixstowe Road opposite King Edward Road. If possible, I consider it better that any servicing road system to the redevelopment(s) loop in from this point to join Hines Road.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees
Other Organisations
Developers and Landowners

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

The site sheet does explain that land should be reserved for either IP010a or IP010b to facilitate development of a cycle and pedestrian bridge. Ultimately, the precise positioning of any footpaths or rights of way will be subject to future master planning and the purpose of this allocation is to safeguard the land in question and to ensure it takes account of its provision.

In addition, there is additional design advice provided in the site sheet and reference to the Wildlife Audit 2019.

13.IP011a – Lower Orwell Street Former Gym & Trim (formerly Smart Street/ Foundation Street)

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26150	Suffolk County Council	Add from this from the SPD: "Design questions would relate to the surviving defences and structures in particular, which were largely left in situ in earlier excavations". Please also note that archaeology could be a major consideration rather than would be?"

The following made no comments in response to this issue.

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

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

The site capacity has been increased from 14 (90dph) to 18 (110dph). This increase was determined as part of a density review of the sites taking into account the sustainable location of the site and its surroundings. The site sheet has been amended to reflect comments from the Archaeology Unit.

In addition, there is additional design advice provided in the site sheet and reference to the Wildlife Audit 2019.

14.IP011b – Smart Street/ Foundation Street (south)

Representations	Comments	Object	Support
1	0	0	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25558	Plansurv Ltd on behalf of Ortona Properties Ltd	The landowner supports the existing allocation for the primary residential use and secondary employment use of the site. the current use of the site remains as a bus depot under a lease agreement but could come forward for development between the middle to end of the plan period. The site provides important linkage for the redevelopment of Merchants Quarter and would provide improved frontage along Star Lane, which in turn would provide visual enhancement to the Central and Wet Dock Conservation Areas.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

Reference to the linkage that the site provides added. Site capacity increased from 44 to 56 to reflect the findings in the density review.

The secondary use of employment (B1) has been deleted. This is because of the surplus of employment land in the Borough and the fact that this site in particular lends itself more favourably to a higher level of residential dwellings than other parcels of land allocated for employment development in the Borough.

Development principles and reference to the findings of the 2019 Wildlife Audit have also been included in the site sheet.

15.IP011c – Smart Street/ Foundation Street (North)

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26151	Suffolk County Council	This was formerly part of 11b, but the requirements are different as most of the area of 11c has been excavated in the past.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

Comments from the Archaeology Unit integrated into the site sheet. In addition, design principles have also been included referencing the sensitive location of the site.

16.IP012 – Peter’s Ice Cream, Grimwade Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No representations made but changed the capacity to 35 (110dph) from 20 (90dph) in the preferred options version of the draft plan. This is to reflect the findings of the density review.

In addition, comments from the Archaeology Unit have been integrated into the site sheet. Design principles have also been included referencing the sensitive location of the site.

17.IP014 – Hope Church

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The planning permission at the former Odeon site (18/00316/FUL) has been listed in the current use section of the site sheet for clarity.

18.IP015 – West End Road Surface Car Park

Representations	Comments	Object	Support
1	0	1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25537	Private individual	I reject any suggestion or plans to development this site and change of use. The land I would only agree to improve parking by the means of a multi-storey carpark. This must remain a commuter's car park in the first instance.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

No comments were made in response to this issue.

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

This site has become an important site in terms of the Council's Parking Strategy which is looking to review car parks in the town so that the needs of residents of Ipswich and the commuting wider public are met. As such this car park is allocated in

part for a multi-storey car park which is designed for long-term parking to meet the needs of commuters.

The site is also a long-term housing site which is a sustainable use of land, given the proximity of the site to the railway station, sources of employment in the immediate environs and within walking distance of the town centre. Hence it remains also important for the remaining part of the site to be allocated for housing.

Residential density has increased to 100 dwellings per hectare (dph) from 90(dph) which increases housing numbers on the site from 43 in the Preferred Options to 67 in the Final Draft Ipswich Local Plan

19.IP028a – Land adjacent to Jewsons, Greyfriars Road

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25899	The Deltic Group	We occupy the night club, Unit 17, which is located to the rear of the proposed redevelopment site. The residential use may result in issues with noise pollution complaints from future residents owing to our use as a nightclub, with music and customers entering and leaving the premises at night.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

Site deleted. This is due to the sensitive setting of the site in terms of its constraints and because there is no reasonable prospect of a planning application being made for the development set out in the allocation.

20.IP028b – Jewsons, Greyfriars Road

Representations	Comments	Object	Support
2	0	1	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25900	The Deltic Group	We occupy the night club, Unit 17, which is located to the rear of the proposed redevelopment site. The residential use may result in issues with noise pollution complaints from future residents owing to our use as a nightclub, with music and customers entering and leaving the premises at night.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25638	Private individual	Support - location is totally unsuitable for this kind of business

The following made no comments in response to this issue.

Parish and Town Councils**Statutory Consultees****Other Organisations**

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

Site moved to policy SP4 as an 'Opportunity Site'.

21. IP029 – Land opposite 674 – 734 Bramford Road

Representations	Comments	Object	Support
1	0	1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25567	Private individual	There have already been two large developments recently and this is last small piece of wild land left. Since the building of the two large developments the population of animals on the site has almost doubled. There is a multitude of Slow-Worms and many other animals need this space including partridges, field mice, monk jack-deers, squirrels and

		bats. Parking is dreadful, and the new access would pose a serious threat to highway safety. There are no shops or community facilities to serve these houses and the schools are full. The land is needed for nature, dog walkers, and children.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

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

This site was allocated for housing and amenity land in the Preferred Options version of the emerging local plan but has now been allocated for 1 ha of B1c, B2, B8 employment land plus open space and link road.

22.IP031 – Burrell Road

Representations	Comments	Object	Support
2		2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25548	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP031 (South bank - Residential)

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25675	Boyer on behalf of East of England Co-Operative Society	The site has constraints in the form of flood risk issues and other contamination, which will affect the site's viability and ability to accommodate an entirely residential scheme. A more viable use for the site would be redevelopment to include a multi-storey car park with hotel, although retaining scope for an

		element of residential as part of a mixed-use approach. It is therefore considered that this site allocation, as currently worded, is not justified as it fails to properly consider viability. As such, it fails to meet the tests of soundness required by paragraph 35 of the NPPF (2019).
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Members of the public

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

The site has been split into two sites (IP031a & IP031b) to reflect the different intentions of the landowners and the submission of recent applications on the eastern side of the site, the most recent of which was recently given a resolution to grant planning permission, subject to S106.

IP031a is formed of the car park which occupies the western portion of the original site. This has an indicative capacity of 20 dwellings (45dph).

IP031b is formed of the eastern part of the original site. The site boundary follows that of pending application 19/00369/FUL. The indicative capacity of this site has been set at 18 dwellings (100dph reflective of highly accessible location – not higher because of heritage constraints).

This site is not suitable for water recreation because of its difficult shape.

The proposed site is designed to form a mixture of higher and lower density dwellings which given the location of the site adjacent to the river should return a reasonable level of viability. (See whole plan viability assessment)

No change

Other changes: Conservation and design comments have been included referencing the proximity of the site to the Stoke Conservation Area; archaeology references have been altered to align with the Archaeology SPD 2018. In addition, development must take account of the River Corridor Buffer (10m)

23. IP032 – King George V Field, Old Norwich Road

Representations	Comments	Object	Support
2		2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25733	Sports England	<p>No objection to this allocation, but we feel the text in relation to the requirements for a replacement facility should be more explicit and should reflect Sport England's policy in relation to replacement playing fields, which states:</p> <p>The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:</p> <ul style="list-style-type: none"> - of equivalent or better quality, and - of equivalent or greater quantity, and - in a suitable location, and - subject to equivalent or better accessibility and management arrangements.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25588	Private individual	<p>Support the need to replace the existing playing fields and facilities to an equivalent/ better standard. Adequate parking for any replacement facilities or extension to Whitton Sports Centre is also important.</p> <p>A vehicle exit other than Old Norwich road is essential to avoid use of the Old Norwich road junction with Norwich road and Bury Road. This junction is already over capacity and the development of Tooks site and recently approved development north for 190 dwellings will likely add to this.</p> <p>The road link between this site and Tooks could create traffic problems within the site if not planned correctly.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

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

The Council agree with the comments made by Sport England, as such the text has been revised to require the replacement facility to be more readily accessible with better management arrangements than the existing facility.

Support for replacement playing fields and facilities is noted. The Council will look to secure facilities of equivalent or better standard as set out within site sheet IP032 and policy DM5 Protection of Open Spaces, Sports and Recreational Facilities. Regarding vehicle access, the site sheet for site IP032 notes that the site has access constraints and requires a transport assessment and travel plan be submitted alongside any application. The transport assessment will focus on the traffic impact of access to Bury Road and the surrounding road network.

Add additional text to the site sheet as outlined below:

The Old Norwich Road junction has received Section 106 money via a recent appeal to fund a mitigation scheme. Further contributions may be required to mitigate the impact from this site.

Other changes:

The Urban Design and Conservation Team have recommended additional wording in the Development Constraints/ Issues section of the site sheet to explain the site context and characteristics. The additional wording also provides guidance to help ensure that future development contributes positively to the character and appearance of the area.

New text in light of Wildlife Audit Update added.

24.IP033 – Land at Bramford Road (Stock’s Site)

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The indicative capacity has been increased from 46 (45dph) to 55 (55dph). This increase has been proposed as a result of the density review as it was considered a greater density could be achieved.

25. IP035 – Key Street/ Star Lane/ Burton’s Site

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25829	Cardinal Lofts (Mill) Ltd	Support the identification of Site IP035, but object to the indicative capacity and lack of express reference to the need to provide parking for both the development itself and adjacent sites (IP206 and IP211). The scanned representation provides additional information on this, including the associated abnormal costs of developing the site.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

The whole plan viability assessment has considered abnormal costs and sites are considered viable. Site capacity is indicative but reflects the sensitivity of the location and the locality. The additional wording in the site sheet arising from the Urban Design and Conservation Team emphasise the sensitivity of the site. No change.

There are no other changes other than comments from on design and how to treat the historic asset rich sensitivity of the locality and the importance to improve public access in this strategic location. In addition, further detailed bat surveys will be required on the building as well as potentially detailed invertebrate surveys. The recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development.

26. IP037 – Island Site

Representations	Comments	Object	Support
5	0	5	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26152	Suffolk County Council	IP037: 'and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work)' could be deleted and replaced with further information on this from the SPD, to avoid appearing too onerous used alternative wording as suggested.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25889	Associated British Ports	ABP is broadly supportive of the mix of uses for IP037 (subject to preparation of a detailed master plan which ABP will work with IBC to agree). The indicative capacity of 421 homes @ 100 dwellings per hectare stated in the Policy should indeed be considered 'indicative' only. In our opinion, the capacity of the site is greater than 421 homes. For the reasons set out in respect to Policy CS20, we do not consider it appropriate for Policy SP2 to refer to the need for "additional vehicular ... access (including emergency access).to be provided to enable the site's development".
25894	Associated British Ports	IP037 – ABP notes and is generally supportive of the guidance on the Site Sheet, save the reference to the need for the provision of additional vehicular access.
25550	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP037 (East bank - Residential/ Open Space)

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25640	Private individual	Would support with the Wet Dock Crossings. However, without the main bridge being built building this site will only exacerbate traffic and pollution problems nearby. Therefore, it is contrary to policy DM3 and should be refused.
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The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

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

The comments from the Archaeology Unit have been incorporated into the site sheet.

The Council does not propose at this time to increase the site's indicative capacity above 421 dwellings, as the Council wishes to retain the existing employment uses at Haven Marina and provide a minimum of 15% amenity space on the site. However, as noted by ABP 421 is the indicative capacity and the site will be subject to a detailed master plan. The site sheet has expanded the information on the master plan and associated expectations.

The Council is working with neighbouring authorities to understand the cumulative impact on the highways network of growth in the local plan to 2036 using the Suffolk County Transport Model, a strategic highway model. Through the work the Council is developing a programme of mitigation. The site is sustainably located close to public transport and jobs and facilities.

The need to take account of the River Corridor Buffer (10m from the river) has now been identified on the site sheet.

The need to enable greater recreational, leisure and sports use of the River has been stated on the site sheet.

The footpaths and safeguarded minerals facility (within 250m) have been earmarked on the site sheet for reference.

In addition, the site sheet also refers to the need for a contaminated land assessment.

27. IP039a – Land between Gower Street & Great Whip Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The indicative capacity of the site on the site sheet has been increased from 43 dwellings (90dph) to 45 dwellings (95dph). It was considered as part of the density review that the site could accommodate a higher density than originally envisaged.

28.IP040 – Former Civic Centre, Civic Drive (Westgate)

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The secondary use on the site sheet has been expanded to include Restaurant (A3) and theatre-related uses. This is taking into account the adjacent theatre use and the potential for the site to contribute positively towards this.

29.IP041 – Former Police Station, Civic Drive

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The indicative capacity on the site sheet has been increased from 46 dwellings (90dph) to 58 dwellings (110dph). This increase has come about as part of the density review of the sites as it was considered that this site had the potential to accommodate a higher density of development. This is because of the site's sustainable location and the surrounding high density.

30.IP043 – Commercial Buildings, Star Lane

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The site name has been amended to remove reference to the “and Jewish Burial Ground”. This is to make it clear that this is excluded from the allocated site.

31.IP045 – Holywells Road East

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26153	Suffolk County Council	This site lies on the edge of the historic channel of the Orwell. There is potential for buried historic deposits. Conditions relating to archaeological work are likely to be relevant on any consent. Desk-based assessment and review of geotechnical data would be appropriate in the first instance.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25568	Imorex Shipping Services	We operate a business unit out of one of these warehouses. If permission to build on this site

		is granted it would have a severe effect on our business. It would cause massive disruption to us and our customers as well as having a massive cost implication to us. We rent our unit, so we would not benefit from any sale. We would have to find a new site that offers the same facilities and there is a shortage of good quality warehouses for rent. Ultimately this would damage the business enough to enforce a closure and jeopardise jobs.
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The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

This site has been moved to Policy SP4 as an 'Opportunity Site'. Please see new policy SP4 within this consultation statement.

The comments from the Archaeology Unit have been factored into the equivalent site sheet for the Opportunity Sites (Appendix 4).

The concerns raised by one of the current operators of the wider site are acknowledged. However, this is anticipated to be a long-term opportunity site and is unlikely to come forward in the early-middle years of the plan period. It is also the prerogative of the land owner to determine how the land in question is occupied or used. The potential allocation of this site as an opportunity site does not in of itself prevent continued business operations from occurring, instead it sets out the Council's aspiration for the site in the future. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

32.IP047 – Commercial Road

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25545	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP047 (North bank - Residential/ Open Space)
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

The site sheet has been amended to include a sentence regarding the desire to enable greater recreational, leisure and sports use of the River.

The footpath along the site and aspiration to upgrade to a bridleway has been pointed out on the site sheet. This is in response to wider comments made by Suffolk County Council.

The site area has been amended from 2.86ha to 3.11ha to align with the boundary information provided under application 19/00148/OUT.

The indicative capacity has been increased from 103 dwellings (90dph on 40% of site) to 173 dwellings (55dph on 80% of site based on pending application 19/00148/OUT). The secondary uses have been amended from 'Hotel & Leisure and public open space and enhanced river path' to 'Retail and public open space and enhanced river path on the southern boundary'. The indicative capacity of the secondary uses has been reduced from 20% of the site to 15% of the site. These changes are all to reflect the pending application 19/00148/OUT.

Reference to the river corridor buffer requested by the Environment Agency has been added to the site sheet.

33. IP048a – Mint Quarter/ Cox Lane East regeneration area

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25601	Department for Education (DfE)	The DfE strongly supports the allocation for a primary school as part of site IP048a.
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25639	Private individual	Masterplan should include land uses that compliment the Regent Theatre by offering restaurants and hotels for people to visit/stay before and after shows at the Regent. This would enhance the visitor experience. Currently as it stands the Regent (the great offering that it is) is dragged down by its surrounding land uses.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

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

Site IP048a has been allocated for a primary school to meet demand for school places in the immediate vicinity. The Borough Council is working with Suffolk County Council to bring forward the site in a timely manner.

The Council is keen to support local arts venues including the Regent Theatre, which draws visitors to the Town. The Council agree that this part of the town would benefit from public realm improvements to enhance the visitor experience. To improve the appearance of the Mint Quarter and Cox Lane area the Council have adopted a Public Realm Supplementary Planning Document which identifies a programme works to enhance this and other areas of the town.

The secondary use indicative capacity has been increased from 47 dwellings (90dph) to 53 (100dph). This increase is on the basis of the density review of sites, particularly due to the sustainable location of the site and surrounding levels of high density development.

34.IP048b – Mint Quarter/ Cox Lane West Regeneration Area

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

The site reference name has been amended to align with other documentation.

The site area has been reduced from 1.57ha to 1.34ha. This is because prior approval (18/00740/P3JPA) has been granted on the north-east corner of the site and therefore this area needs to be discounted from the site area.

The secondary residential indicative capacity has been reduced from 42 to 36. This is to take account of the reduced site area and adjusting the density calculation accordingly.

Suffolk County Council have requested that the relevant footpaths and other public rights of way are highlighted in the supporting text. Therefore, the relevant footpaths have been included accordingly. Also, the opportunity to explore north-south cycling links has been highlighted as a development principle.

35.IP052 – Land between Lower Orwell Street & Star lane (Former Essex Furniture)

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

This site sheet has been moved to appendix 4 as it has been reallocated as an 'Opportunity Site'. The site is now located under Policy SP4.

36.IP054b – Land between Old Cattle Market and Star Lane

Representations	Comments	Object	Support
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2		2	0
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25559	Plansurv Ltd on behalf of Ortona Properties Ltd	The Cattlemarket bus station is within the opportunity area for Merchants Quarter, however the allocation reference IP054b should be extended north to include this. The Plan states that the redevelopment of Merchants Quarter would provide key linkages from the Waterfront to the town centre. Therefore, the possible future redevelopment of the site could enhance connectivity, providing a pedestrian friendly area to link Turret lane to Dogs Head Lane/ Buttermarket Shopping Centre. The land is under lease as a bus station however given the regeneration ambitions it should be extended north to include the opportunity area to allow for comprehensive redevelopment.
25561	Plansurv Ltd on behalf of Ortona Properties Ltd	See attached scanned map showing land ownership to support submission 25559.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

The indicative residential capacity has been increased from 31 (55dph on 60% of site) to 40 (60dph on 60% of site). This increase is on the basis of the density review work where it was identified that due to the sustainable location of the site that a higher density may be feasible.

The Council do not propose to make any changes other than increasing the density of the site but a key issue is to ensure connectivity with surrounding development.

The Conservation and Urban Design Team have made a number of design comments in the site sheet for the site to enhance future development of the site and to consideration of heritage assets including the setting of the Central Conservation

Area ensuring the sensitivity of the site location in relation to the locality is adhered to.

Although this site is currently of low wildlife value, there is a potential risk that buildings could support bats and consequently an internal inspection by a suitably qualified ecologist is recommended, which will also encompass nesting birds. To achieve biodiversity net gain, the recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development. This has also been taken account of in the site sheet.

37.IP061 – Former School Site, Lavenham Road

Representations	Comments	Object	Support
2	0	2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25586	Suffolk Primary Care	<p>The recreation area is used by the local community regularly. Chantry Park is too far away.</p> <p>The area is used by local residents during the summer for picnics and socialising, when the local play bus visits, youth groups to play football and dog walkers.</p> <p>There are parking problems in the area which would be exacerbated.</p> <p>Difficulty accessing the site by lorries and workforce associated with construction. Also noise pollution.</p> <p>The Open Space, Sport and Recreation Study identifies it for informal recreation and it should stay.</p> <p>Instead of more development and congestion, money should be spent on play equipment.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25585	Private individual	<p>Can you confirm what sort of dwelling this would be as the site notice is incredible vague?</p> <p>The space is not big enough for 30 houses, so would this be flats?</p>

		<p>Incredibly upset to see the trees have been cut down yesterday when it hasn't been given the go ahead, or has it?</p> <p>I walk my dog around the field regularly and kids use it in the summer.</p> <p>The only other option is to go over the park which isn't well lit or safe.</p> <p>The field is the heart of the community and its loss would be a real shame.</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

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

The site area for housing development has been reduced from 1.08ha to 0.9ha. The residential indicative capacity has been decreased from 30 (40dph on 70% of site) to 23 (40dph on 60% of site). The secondary amenity green space has been increased in terms of site coverage percentage from 30% to 40%. A revised site map has been prepared. All of these changes have taken place due to the granting of planning permission (18/00991/FPC) on part of the site. This has resulted in a reduction in residential capacity but the amenity green space has been retained at 0.32ha.

The site name has been amended to include 'Former' to make it clear that it is not a currently used school site.

38.IP064a – Land between Holywells Road and Holywells Park

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26030	Suffolk County Council	Additional wording proposed in respect of archaeology for IP064a.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25609	Shallish Associates Ltd on behalf of FIS Property Ltd and Landex Ltd	The allocation for housing is supported and the likely timescale for delivery (M) is considered to be realistic. It is noted that the capacity is 'indicative'. However, it is considered that the indicative capacity of 66 homes is low and, given the site's sustainable location and the character of the area, there is scope for significantly more homes to be provided. Subject to design and ratio of flats/ houses, it is considered therefore that a significantly higher capacity could be achieved. Requested that the indicative capacity and density (55dph) be expressed as minimum to be consistent with Policy DM23.
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The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

The site name has been amended to be more specific about the site location.

The reference to the proposed roundabout to serve the main Upper Orwell Crossing (TUOC) road bridge has been deleted in light of the cancellation of TUOC.

The comments from the Archaeology Unit have been incorporated into the site sheet. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

39.IP066 – JJ Wilson and land rear at Cavendish Street

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25569	Prestige Car Repairs Ltd	Cavendish Street is a rat-run with cars speeding up and down this road posing a serious risk to highway safety. Traffic regularly queues down Cavendish Street to get onto

		<p>Felixstowe Road at peak times resulting in oncoming traffic driving up the pavement. When the Orwell bridge there is significant traffic congestion which has an impact on the operation of our business.</p> <p>Double yellow lines were attempted to be painted in 2018 on the corner of White Elm Street but have yet to be implemented. There are high levels of HGV movements.</p> <p>Building 47 houses in a congested area is unacceptable.</p>
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

The Alan Road area has received extensive traffic calming measures which has had a positive impact on the surrounding round networking including Cavendish Road. Traffic in the area will be further addressed through a Borough wide initiative to reduce traffic on Ipswich's Road network by encouraging sustainable travel choices.

The site capacity has been increased from 47 (55dph) to 55 (65dph). This is following a review of the density of sites undertaken by officers. The site is located in close proximity to local services and facilities and it is considered that a higher capacity is achievable on this site than previously stated.

40. IP067a – Former British Energy Site

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The site name has been amended to include 'Cliff Quay' to make it clearer as to where the site is.

The Highway Authority has recommended that the likely need for signal control and possibly toucon facilities for IP067b.

41.IP080 – 240 Wherstead Road

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26155	Suffolk County Council	Wording could be changed from 'will require' an archaeological condition to 'may require an archaeological condition, subject to development details'.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The archaeology comments in the site sheet have been updated.

42.IP083 – Banks of River upriver from Princes Street

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25547	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP083 (North bank - residential/ open space)

The following made no comments in response to this issue.

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

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

Remove the housing allocation for 14 dwellings and allocate for open space only.

43.IP089 – Waterworks Street

Representations	Comments	Object	Support
1	0	0	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25680	Boyer on behalf of East of England Co-Operative Society	This site is currently occupied by education centre and associated parking. The Society support this proposed allocation for 23 residential units.

The following made no comments in response to this issue.

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

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

The Council notes the current use of the site and the Co-Op's support for this allocation. Design advice and also the recommendations of the Wildlife Audit 2019 have been added to the Site Sheet.

44.IP096 – Car Park, Handford Road East

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

No representations have been made regarding this allocation. However, the site sheet has been changed to incorporate design advice; the need to retain a 10m buffer from the river as requested by Natural England and the need to take account of the findings of the Wildlife Audit 2019.

45.IP098 – Transco, south of Patteson Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No representations have been made regarding this allocation to address. However, the number of dwellings in terms of site capacity has increased from 51 in the Preferred Options version of the plan to 62 as a result of the density review conducted as part of the preparation of the Final Draft Local Plan.

In addition, design advice has been incorporated into the site sheet for the site as well as the need to incorporate the recommendations of the 2019 Wildlife Audit.

46.IP105 – Depot, Beaconsfield Road

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26147	Ipswich Canoe Club	Please consider provision of River Gipping 'portage' easy river access within: IP105 Land allocated for Residential Use

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public**How these comments have been taken into account in the Final Draft Local Plan:**

The Environment Agency have requested a buffer zone of 10m from the river where development should not take place. Therefore, as the site falls partially within the buffer zone this has been referred to in the site sheet to help guide any future development. In addition, design advice has been incorporated.

Policy DM10 has been amended to encourage development near the river to enhance public slipway access, where practicable. It is therefore not necessary to explicitly state this in the site sheet.

47.IP119 – Land east of West End Road

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26156	Suffolk County Council	This area is within Archaeological Character Zone 2a as set out in the SPD. Add additional wording as suggested.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25542	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of River Gipping 'portage' access and facilities within IP119 Land for residential use.

The following made no comments in response to this issue.

Parish and Town Councils**Developers and Landowners****Members of the public****How these comments have been taken into account in the Final Draft Local Plan:**

Proposed land uses have changed so that it now proposes to accommodate 45% housing (28 dwellings); 40% boat launch facilities and 15% employment.

Policy DM10 has been amended to encourage development near the river to enhance public slipway access, where practicable. It is therefore not necessary to explicitly state this in the site sheet.

48.IP120b – Land west of West End Road

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26031	Suffolk County Council	IP120b This area is within Archaeological Character Zone 2a as set out in the SPD. Add additional wording as suggested.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25543	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (above 'SM Weir') 'portage' access and facilities within IP120b Land for residential use.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

Increased the housing density from 90dph to 125 dph increasing housing numbers from 74 (in the Preferred Options) to 103 dwellings with 20% open space adjacent to the sub-station.

Add new text to site sheet reference IP120b 'Depending on the nature of the proposed ground works, a condition relating to a programme of archaeological work.'

Reference to the River Corridor Buffer (10m) that needs to be in place where no development is allowed.

In addition, reference to the site sheet to refer to the adjacent County Wildlife site and the need to implement recommendations in the Wildlife Audit

Policy DM10 has been amended to encourage development near the river to enhance public slipway access, where practicable. It is therefore not necessary to explicitly state this in the site sheet.

49.IP129 – BT Depot, Woodbridge Road

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26002	Suffolk County Council	The County Council does not support the allocation of site IP129 for housing. A bid has been submitted to the Department for Education to establish a Special Educational Needs and Disability (SEND) Free School on this site. The site is currently owned by the DfE. A high-level feasibility has been undertaken which indicates that a 60-place school could be accommodated on the site in a two-storey building. As such the County Council asks that a policy framework be established to support the delivery of a school on this site.

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25603	Department for Education (DfE)	The DfE understands Suffolk County Council is looking to open a SEND school on the Woodbridge Road site (site allocation IP129). We would encourage the council to engage with Suffolk County Council on this and consider re-allocating this site for D1 use to accommodate the proposed school.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations
Developers and Landowners
Members of the public

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

In the light of Suffolk County Council's request that a policy framework be established to support the delivery of a school on this site, and a bid has been submitted to DfE to establish a Special Education Needs and Disability Free School, this housing site has been deleted from the Final Draft Local Plan.

The site sheet has been deleted.

IP129 has been referenced in Policy SP7 (community facilities) instead.

50. IP132 – Former St Peters Warehouse Site, 4 Bridge Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

No representations to respond to.

However, heritage and design comments added to the site sheet because of the sensitivity of the site. In addition, development of this site should also consider the heritage and design comments provided on the allocated site references IP136 and IP035.

51. IP133 – South of Felaw Street

Representations	Comments	Object	Support
1		1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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25551	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP133 (West Bank - Residential)
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

As the site does not benefit from direct access onto the River it is not considered appropriate to include reference to enhancing water-based recreation in this instance.

The site capacity has been increased from 33 (90dph) to 45 (120dph) to reflect a historic permission and recent pre-application discussions.

52. IP135 – 112-116 Bramford Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No representations made to respond to.

The indicative capacity has been increased from '14 (application 14/00668/OUT)' to '19 (110dph based on location within Local Centre)'. This increase was decided upon as part of the density/ capacity review undertaken by officers. The indicative capacity of 14 equated to 82dph and it was determined that given the availability of services and facilities within walking distance of the site that there may be scope for a higher level of density in this instance.

The Urban Design and Conservation Team has requested additional wording be added to the site sheets to explain the context and site characteristics. In addition, wording has also been recommended to help guide future development to respond positively to the character and appearance of the area. Subsequently, additional wording has been included on the site sheet accordingly.

Development of the site also has to meet the requirements of the 2019 Wildlife Audit.

53. IP136 – Silo, College Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

No representations to respond to.

Design and Conservation advice added to the site sheet.

54. IP143 – Former Norsk Hydro, Sandyhill Lane

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

Additional comments have been added to the Site Sheet to reflect the findings of the HRA to read: 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

55. IP150d – Land south of Ravenswood Sports Park

Representations	Comments	Object	Support
5	0	5	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25849	Ravenswood Environmental Group	This should be described as "land south of Alnesbourn Crescent". There is no justification for this allocation which is an odd shape to be developed effectively particularly as a neighbouring development to a sports park. The plan is vague about this site. Again, if it is to be proposed then it should be part of a wider allocation. The site has serious nature conservation issues. Unclear how the Sports Park would be integrated with such a strange shape of development. It looks like a frontage development with a Sports Park to the rear, contrary to Designing Out Crime principles.
25850	Ravenswood Environmental Group	No justification for reverting from employment to housing. Traffic impact has not been assessed. Nothing to rule out piecemeal planning applications. The site is visually and ecologically connected to the adjacent nature reserve. Density at 35dph is higher than surroundings. Need for green infrastructure will increase this density. Vagueness about how it will come forward. Without a comprehensive and cumulative assessment of all proposals in this area the piecemeal developments would exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality. A comprehensive proposal must be subject to EIA. Referred to as brownfield but clearly greenfield land.
26118	Ravenswood Residents Association	Cumulative impact of IP150e, IP150d and IP150a (UVW) = 254 dwellings. Recommendations: 1) To be kept informed on the plans which should reflect IBCs undertaking for 65.8% Private Housing and 34.2% Social Housing mix. 2) Additional new access/egress to Ravenswood to cope with the expected surge in traffic volumes, as already heavy congestion problems at the current /2 roundabout access point during:

		<ul style="list-style-type: none"> - morning/ evening rush-hours - school drop-off/ pick-up times - lunch times – restaurant traffic particularly the McDonalds queue which blocks roundabouts and prevents traffic going to/ from the busy shopping mall, but also IMPORTANTLY any EMERGENCY VEHICLES.
25635	Suffolk Wildlife Trust	<p>We note that site 150d is allocated for employment use in the current Local Plan as part of site 150b. As with sites 150b and 150d this area, the continued allocation of this area is regrettable as it is an area of wildlife value and forms part of the ecological corridor on the south-eastern edge of the town. Proposals for any development on this site must be informed by survey and assessment of all of the ecological receptors likely to be impacted by the development. Appropriate ecological mitigation and enhancement measures must be embedded as part of any proposal.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25570	Private individual	<p>The current natural area adjacent to Alnesbourn Crescent forms an important part of the natural beauty and wildlife land of Ravenswood. The proposal, especially of IP150d would greatly reduce the natural habitat in the Ravenswood estate.</p> <p>Traffic is already of a major concern to residents on the estate, with the current Ravenswood roundabout congested during both rush hours. The addition of new homes on the estate would put an undue stress on an already stretched junction and there is no detail of how these concerns would be alleviated.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

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

It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements.

Additional text has been added to the site sheet to reflect the findings of the HRA to read: 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

Please note, the allocation is for housing use rather than employment and will contribute to meeting the Borough's housing needs.

56.IP150e – Land south of Ravenswood (excluding area fronting Nacton Road)

Representations	Comments	Object	Support
6	0	6	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25851	Ravenswood Environmental Group	No justification for reverting from employment to housing. Traffic impact has not been assessed. Nothing to rule out piecemeal applications. It is visually and ecologically connected to the adjacent nature reserve. Density is higher than surroundings. Existing green infrastructure should be preserved. Need for green infrastructure will increase density. Vagueness about how it will come forward. Without a comprehensive and cumulative assessment of all proposals in this area the piecemeal developments would exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality. A comprehensive proposal must be subject to EIA. Referred to as brownfield but clearly greenfield.
26119	Ravenswood Residents Association	Cumulative impact of IP150e, IP150d and IP150a = 254 dwellings. Recommendations: 1) To be kept informed on plans which should reflect IBCs undertaking for 65.8% Private

		<p>Housing and 34.2% Social Housing mix.</p> <p>2) Additional new access/egress to Ravenswood to cope with the expected surge in traffic volumes, as already congestion problems at the current roundabout access point during:</p> <ul style="list-style-type: none"> - morning/ evening rush-hours - school drop-off/ pick-up - lunch times – restaurant traffic prevents traffic going to/ from the busy shopping mall and IMPORTANTLY EMERGENCY VEHICLES. <p>IP152, IP150e and IP150c need to be master planned with second access point for Ravenswood.</p>
25637	Suffolk Wildlife Trust	<p>We note that site 150e is allocated for employment use in the current Local Plan as part of site 150c. As with sites 150b and 150d this area, the continued allocation of this area is regrettable as it is an area of wildlife value and forms part of the ecological corridor on the south-eastern edge of the town. Proposals for any development on this site must be informed by survey and assessment of all of the ecological receptors likely to be impacted by the development. Appropriate ecological mitigation and enhancement measures must be embedded as part of any proposal.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25571	Private individual	<p>The current natural area adjacent to Alnesbourn Crescent forms an important part of the natural beauty and wildlife land of Ravenswood. The proposal, especially of IP150e would greatly reduce the natural habitat in the Ravenswood estate.</p> <p>Traffic is already of a major concern to residents on the estate, with the current Ravenswood roundabout congested during both rush hours. The addition of new homes on the estate would put an undue stress on an already stretched junction and there is no detail of how these concerns would be alleviated.</p>
25555	Private individual	<p>Expresses concern for the allocation for 126 dwellings at site ref IP150e and additional 34</p>

		dwellings on site ref IP150d which previously was all going to be part of a sports complex area. The cumulative effect on traffic and the single point of entry to the Ravenswood area and 160 homes will end up making the traffic situation intolerable.
25557	Private individual	Submission accepts the development of Sites U, V and W nearby but believes the development of 150d and 150e will add to the strain on the local infrastructure. IBC is purely looking at available space without recognising that Ravenswood is hemmed in to the town centre to the north west, the A14 to the south and the railway line to the north east. We are boxed in and limited to one point of access. Cramming too many homes onto the development is just crazy.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

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

It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements.

Additional text has been added to the site sheet to reflect the findings of the HRA to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

57. IP172 – 15-19 St Margarets Green

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public**How these comments have been taken into account in the Final Draft Local Plan:**

Design and conservation comments added to the site sheet.

58. IP188 – Webster’s Saleyard site, Dock Street

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25549	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP188 (South bank - residential)

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

Reference to 10m river buffer where no development should take place; and the requirement for bat survey investigation prior to demolition as outlined in the 2019 Wildlife Audit.

The site sheet has been amended to encourage slipway or pontoon access and facilities to be considered.

59. IP221 – Flying Horse PH, 4 Waterford Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners
Members of the public

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

No representations made to respond to.

However the following has been added to the site sheet: The recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development. Also design advice given the complexity of site.

58.IP226 – Helena Road/ Patteson Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

No representations made to respond to. This site has been moved to Policy SP4 as an 'Opportunity Site'. Please see new policy SP4 within this consultation statement.

Also, additional paragraphs added to the site sheet to reflect Design and Conservation comments so that a high quality scheme can be achieved on this prominent site. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

59.IP279 (a,b,and c) – Former British Telecom Office, Bibbs Way

Representations	Comments	Object	Support
2		2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary

26033	Suffolk County Council	Site lies largely in Archaeological Character Zone 1d identified in the SPD, the Handford Road area, rather than 2a which is quoted, although it is at the boundary between the two- it makes a significant difference, and the text needs replacing (see suggested wording).
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26062	Barton Willmore on behalf of Telereal Trillium Ltd	Telereal is pleased that IBC has allocated the whole of the Bibb Way site (IP279) (1.67ha) for residential development, following the grant of prior approval in 2018. However, the Prior Approval relates only to the 0.7ha (Area 1) and will deliver 104 units. Area 2 (0.39ha) and Area 3 (0.61ha) can deliver a further 49 dwellings without compromising the implementation of the Prior Approval. See comments on CS5, CS7, CS8 and CS12 regarding the need to make optimal use of the site and to increase the density.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

Because of the archaeology associated with the site, it is not accepted that the site is capable of the dense dwelling numbers proposed by the objector.

The Bibb Way site (IP279) has been divided into three sites to reflect the granting of prior approval on the central section of the site for an office-to-residential conversion. As the land to the north and south of this does not fall under the prior approval, it needs to be made clear that these two parcels of land are still allocated for residential under Policy SP2. The central element has been recorded under Policy SP3 as it already has prior approval granted.

Master planning work is required in bring the sites forward with the landowner. The IP279 site has been split into three sites to reflect the approval of the recent prior approval (18/00470/P3JPA). As the two remaining parcels of land (IP279b(1) and IP279b(2)) are physically separated by the prior approval, they have been sub-divided into two separate sites. The capacities indicated have been formulated on

the basis of early master planning discussions with the site owner. ie IP279b(1) - 18 dwellings and IP279b (2) – 29 dwellings. IP279a is the element with prior approval and this element of the site has been moved to Table SP3 – Land with residential planning permission.

The site sheet has also been expanded to better reflect the 2018 Archaeology SPD findings regarding the site.

In addition, development of IP279b(2) must take account of the River Corridor Buffer (10m) where no development should take place. The findings of the 2019 Wildlife Audit must also be complied with. The site may also need to include early years provision.

60. IP283 – 25 Grimwade Street

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26158	Suffolk County Council	Insert the following additional wording; "The site is on the outskirts of the core of the medieval town. A Post-medieval tile built kiln or oven was recorded immediately to the immediate north, along with potential evidence for a bank associated with a medieval water channel (IPS 440). A condition on any consent would be required. Evaluation in accessible areas should be undertaken as a first stage of work

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

This site now has planning permission for 14 dwellings and not the 12 dwellings that was originally anticipated. Consequently, as the site has planning permission it

needs to be safeguarded under Policy SP3. SP3 sites do not have site sheets and therefore the site sheet must be deleted.

This means that the Suffolk County Council comment is irrelevant to the Site Sheet as it has been overtaken by events.

61. IP307 – Prince of Wales Drive

Representations	Comments	Object	Support
1	0	0	1

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25676	Boyer on behalf of East of England Co-Operative Society	This site's allocation for residential use is entirely supported by the Society. It is still the Society's intention for the site to be re-developed to provide a residential scheme, which is anticipated to come forward within the next 6-10 years.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Members of the public

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

Support for the development of this site is noted.

In addition, design and conservation advice has been added to the site sheet to assist developers in providing a high-quality scheme for the site.

To achieve biodiversity net gain, the recommendations of the Ipswich Wildlife Audit 2019 should be incorporated into future development of the site.

62. IP309 – Former Bridgeward Social Club, 68A Austin Street

Representations	Comments	Object	Support
N/A	N/A	N/A	N/A

This is a new site that has been included in response to comments made on the SHELAA.

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

This is a new site that has been inserted into Policy SP2 following comments made by the agent (on behalf of the landowner) at the Preferred Options stage.

63.IP346 – Suffolk Retail Park - north

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26159	Suffolk County Council	Depending on the nature of proposed groundworks, an archaeological condition may be appropriate to secure a programme of works.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26148	Ipswich Canoe Club	Please consider provision of River Gipping 'portage' easy river access within: IP346 Land allocated for Residential Use

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

There has been considerable investment in this successful retail park. Therefore, it has been decided to delete this site from the Final Draft Local Plan as it is no longer considered to be deliverable over the plan period.

64.IP354 – 72 (Old Boatyard) Cullingham Road

Representations	Comments	Object	Support
N/A	N/A	N/A	N/A

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

This is a new site that has been inserted into Policy SP2 by the Council.

65.IP355 – 77-79 Cullingham Road

Representations	Comments	Object	Support
N/A	N/A	N/A	N/A

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

This is a new site that has been inserted into Policy SP2 by the Council.

66. Policy SP3 – Land with planning permission or awaiting Section 106

Representations	Comments	Object	Support
1	0	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25830	Cardinal Lofts (Mill) Ltd	The Company supports the intentions underlying Policy SP3 and in particular, the identification of Sites IP206 and IP211. The Company considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).

The following made no comments in response to this issue.

Parish and Town Councils**Statutory Consultees****Other Organisations****Members of the public****How these comments have been taken into account in the Final Draft Local Plan:**

The capacities at IP206 and IP211 have not been increased as requested. IP206 (Cranfields) and 211 (Regatta Quay) are both under construction with the permissions referenced in table 2 being implemented. It would therefore be inappropriate to amend these capacities as these are based upon the permissions.

67. IP005 – Former Tooks Bakery, Old Norwich Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

68. IP042 – Land between Cliff Quay and Landseer Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

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

Representations	Comments	Object	Support
1		1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26085	Suffolk County Council	Highways: Rights of access through to Hadleigh Road also required. Bridge need not land on the river path but must link to it.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet. The comments from the county council have therefore been overtaken by events.

70.IP074 – Church and land at Upper Orwell Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

71.IP088 – 79 Cauldwell Hall Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners
Members of the public

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

This site now has planning permission. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

72.IP109 – R/O Jupiter Road & Reading Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

This site is awaiting completion of a Section 106. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

73.IP116 – St Clement's Hospital Grounds

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

74.IP131 – Milton Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This site now has planning permission. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

75.IP142 – Land at Duke Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This site now has planning permission. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

76.IP150a – Ravenswood U, V, W

Representations	Comments	Object	Support
2		2	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25843	Ravenswood Environmental Group	This site is allocated by SP3 but it doesn't particularly fall within that category. It's debatable whether this site can be delivered

		based on the 2007 Permission following the refusal of Reserved Matters Consent so long ago. Given that the Council's strategy for the site has been rejected by the Planning Inspectorate, it's essential that the Local Plan contains a criteria based policy saying in what circumstances a detained planning permission would be granted. The Local Plan gives decision makers no direction about the site's future. The SHELAA refers to this site as a brownfield site but is clearly greenfield.
26120	Ravenswood Residents Association	Cumulative impact of IP150e, IP150d and IP150a (UVW) = 254 dwellings. Recommendations: 1) To be kept informed on the plans which should reflect IBCs undertaking for 65.8% Private Housing and 34.2% Social Housing mix. 2) Additional new access/egress to Ravenswood to cope with the expected surge in traffic volumes, as already heavy congestion problems at the current /2 roundabout access point during: - morning/ evening rush-hours - school drop-off/ pick-up times - lunch times - restaurant traffic particularly the McDonalds queue which blocks roundabouts and prevents traffic going to/ from the busy shopping mall, but also IMPORTANTLY any EMERGENCY VEHICLES.

The following made no comments in response to this issue.

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

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

The site has outline planning consent. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

The transport modelling work is based on cumulative developments which includes 94 dwellings anticipated for this site. This will consider the impact on junctions from other nearby developments including the Ravenswood allocations.

77.IP161 – 2 Park Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

A 2019 planning application decision is pending. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

78.IP165 – Eastway Business Park, Europa Way

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

79.IP169 – 23-25 Burrell Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

80.IP200 – Griffin Wharf, Bath Street

Representations	Comments	Object	Support
1	1	0	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25552	Ipswich Canoe Club	To enable greater recreational, leisure and sports use of the Gipping and Orwell rivers, please consider provision of Upper River Orwell (tidal) slipway or pontoon access and facilities including boat storage facilities within IP200 (West bank - Planning Permission).

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

This site has planning permission pending. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

81.IP205 – Burtons, College Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners
Members of the public

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

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

82.IP206 – Cranfields, College Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

83.IP211 – Regatta Quay, Key Street

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

This site now has planning permission and is in the process of being built out. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

84.IP214 – 300 Old Foundry Road

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

Developers and Landowners

Members of the public

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

This site now has planning permission. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

85.IP256 – Artificial Hockey Pitch, Ipswich Sports Club

Representations	Comments	Object	Support
1	0	1	0

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26138	Private individual	<p>The housing number (18) is inconsistent with the nature of the surroundings.</p> <p>Traffic access to/ from the site will cause danger to pedestrians and cyclists.</p> <p>Furthermore Henley Road will become increasingly congested as development of the IGS progresses and will lead to queuing to leave the site at busy times, lowering air quality.</p> <p>If development is allowed this would be an ideal site for sheltered units for elderly people as this is unlikely to result in traffic problems at busy times and would release homes elsewhere.</p> <p>The 47dph density is far from the low density intended for this area.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees
Other Organisations
Developers and Landowners

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

This site is awaiting completion of a Section 106. The site has therefore moved to Table 2 'Sites with planning permission or awaiting a Section 106 Agreement' and therefore no longer requires a site sheet.

86. Policy SP4 – Opportunity Sites

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

This is a new policy that has been added at the Final Draft stage of plan preparation. Therefore, there were no comments received at Preferred Options stage.

87. Policy SP5 – Land allocated for employment use

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26146	Ipswich Canoe Club	Please consider provision of public slipway access to the upper River Orwell within: E9 Riverside Industrial Park and the West Bank area (West Bank), and E12 Cliff Quay/Sandy Hill Lane / Greenwich Business Park / Landseer Road area (East Bank) Please consider provision of River Gipping 'portage' easy river access and facilities, including possible canoe/kayak storage facilities within: E4 Boss Hall Industrial Estate

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

The comments relate to the defined Employment Areas listed in Policy DM33 (Protection of Employment Land). Policy SP5 concerns new employment allocations. Nevertheless, the employment areas do represent opportunities to improve recreational access to the rivers. However, the ability to incorporate public slipway access into employment sites will not always be practicable and therefore it needs to be acknowledged that this can't be sought in all circumstances. As a result, Policy DM10 (Green Corridors) has been amended to facilitate public slipway access where feasible.

IP011b has been removed from Table 3. This is because IP011b has been amended to remove the employment aspect. This is due to the need to increase the housing capacity of Ipswich to help meet Ipswich's housing target and improve the delivery of housing in the Borough. As the Local Plan identifies a minimum employment land requirement of 23.2ha and the Council has allocated 28.34ha of land, the Council has reviewed its employment sites. As IP011b is situated close to the air quality management area the B1(a) office use anticipated may increase vehicle movements and make the plan objective of tackling air quality more challenging, in comparison to some of the other employment allocations in Table 3. Therefore, in light of the demand for housing and over-supply of employment land, it was felt appropriate to remove the employment aspect of the allocation.

IP147 has been removed from Table 3. This is because the development granted under planning permission 18/00534/FUL has commenced. Consequently, there is no longer a need to safeguard this land for employment development.

IP029 has been reallocated from residential to circa 1ha of employment uses. IP119 has been reallocated from residential to a residential-led mixed use allocation which includes approximately 0.1ha of employment uses.

To reflect the removal of the two allocations and the insertion of the two sites listed above, the total amount of employment land safeguarded under Policy SP5 in Table 3 has been reduced from 32.2ha to 28.34ha.

88. IP067b – Former British Energy Site

Representations	Comments	Object	Support
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1	1	0	0
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Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26086	Suffolk County Council	Highways: Likely to require signal control of Landseer Road/ Sandyhill Lane as mitigation. Toucan facility in signals represent an opportunity to improve sustainable access.

The following made no comments in response to this issue.

Parish and Town Councils**Other Organisations****Developers and Landowners****Members of the public****How these comments have been taken into account in the Final Draft Local Plan:**

The existing site sheet highlights that the site has access constraints and the need for a transport and travel plan. The Council has updated site sheet IP067 requiring signal control on Landseer Road and Sandyhill Lane and a Toucan facility.

Suffolk Wildlife Trust have recommended additional wording which has been incorporated into the site sheet. Comments from the Urban Design and Conservation Team wording have been included in the site sheet to highlight the context and site characteristics. In addition, guiding principles for future development have been proposed.

89.IP094 – Land to rear of Grafton House

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26087	Suffolk County Council	Highways: Access constraints - Access from West End Road may not be acceptable. Low car parking required.

The following made no comments in response to this issue.

Parish and Town Councils**Other Organisations**

Developers and Landowners
Members of the public

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

Additional wording has been added to the relevant site sheet to read:
 An alternative link to Constantine Road should be investigated, with a potential opening up of the West End Road/Constantine Road junction to address possible access issues from West End Road.

Other changes include design and conservation comments referencing the context and the need to have regard to the setting of the Grade II listed Paul's Maltings. Additional text has been added to the site sheet to reflect the findings of the HRA to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

90.IP140 – Land north of Whitton Lane

Representations	Comments	Object	Support
3	2	0	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26032	Suffolk County Council	There has been progress on this site. Delete everything from 'Detailed discussions will be required with Suffolk County Council Archaeological Service'... Replace with: This site has been subject to geophysical survey and trenching, which has confirmed that cropmarks visible on it relate to Bronze Age and Iron Age archaeological remains in particular, including a settlement, with some Roman activity. Conditions on any consent will be required to secure programmes of archaeological investigation, analysis, archiving and public dissemination of information. Suffolk County Council Archaeological service can advise on the scope of works.
26088	Suffolk County Council	Highways: - Public rights of way improvements as a mitigation and opportunity to improve sustainable access. - Site is likely to have a significant on junction

		already under strain (Anglia PS/ Bury Road) and junction (capacity) enhancement may be necessary to avoid cumulative residual severe impact.
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Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25938	Ashfield Land Limited	Support the recognition that the site could be suitable for B1, B2 or B8, together with other appropriate employment-generating sui generis uses. Part of the site already benefits from planning permission for a B8 led development. We also note reference to the site being planned comprehensively as part of a larger scheme with adjacent land in Mid Suffolk. There is an outline permission for up to 190 dwellings allowed at appeal (3200941) on adjacent land. The landowner intends to promote the remainder of the site (extending to the north of the permitted development) for future residential development.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

The archaeology references have been updated in the site sheet to reflect the contents in the Archaeology SPD and in the County Council's objection.

The Council also notes the landowners intention to plan the site comprehensively with land to the north of the site in Mid Suffolk which already has the benefit of outline planning permission.

Other changes to the site sheet include design and conservation comments reflecting the proximity of designated and non-designated heritage assets and the Whitton Conservation Area. As well as design and materials advice including the requirement of a comprehensive landscaping strategy.

Old Norwich Road/Bury Road and Whitton Church Lane junctions both have contributions from the recent appeal site. It is likely that this site will need to contribute to a larger mitigation package for these junctions.

91.IP141a (1) & (3) – Land at Futura Park, Nacton Road

Representations	Comments	Object	Support
5	1	4	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26089	Suffolk County Council	Highways: Site is likely to have a significant on junction already under strain and junction (capacity) enhancement may be necessary to avoid cumulative residual severe impact.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25809	AONB	Futura Park lies within 200m of the boundary of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and is therefore considered to be within the setting of the nationally designated landscape. Whilst we acknowledge that much of this site is already built out and is physically separated from the AONB by the A1189, any future development applications, especially site IP141a should be supported by an assessment of impacts on the Natural Beauty of the AONB. This includes use as a Park and Ride site as indicated in para 4.4, of Policy SP9 (Safeguarding land for transport infrastructure).
25855	Ravenswood Environmental Group	The traffic impacts of this development must be assessed cumulatively along with the 24 hectares of development proposed at Ravenswood.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25721	Freeths LLP on behalf of AquiGen	<p>Consider that site 1 (appendix 1) should be removed because:</p> <ul style="list-style-type: none"> - Futura Park has had extensive marketing since early/ mid 2012. - There has been no interest in the frontage plot for B Class uses consistent with the 2011 permission. - It has attracted no interest despite being serviced and benefiting from a permission. - The New Anglia Enterprise Zone in 2016 has not led to new interest. - The plot has a different townscape character to the remaining parts of Futura park; - Could accommodate other non B class uses; - Interest in sites 6 and 7
25722	Freeths LLP on behalf of AquiGen	<p>There is no reasonable prospect of site 1 being used for employment purposes. There has been more than 12 months active marketing. The removal of the plot will have no material impact on employment land supply in Ipswich as there is already an over-supply of proposed allocations. The removal of this 1.22ha plot will result in a residual land supply of 30.98ha. The removal of the site also leaves circa 26ha of suitable industrial land in excess of the 9ha required. To comply with NPPF paragraph 120 there is justification to de-allocate site 1 and consider a more deliverable use.</p>

The following made no comments in response to this issue.

Parish and Town Councils
Members of the public

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

It is accepted that the site is likely to require junction capacity enhancements from the A1189 / Nacton Road to A1156 Warren Heath junctions. A transport assessment and travel plan will be required. This has been added to the site sheet for the site.

Site 2 is currently being developed and therefore has been removed as an allocation. The site scored highly in the ELSA and is one of Ipswich's prime employment sites and therefore should remain an employment site. It is greenfield, located close to major transport networks and well designed. Therefore no change is recommended.

Other changes to the site sheet include reference to the need for surveys for reptiles, bats and detailed terrestrial invertebrate surveys are required. The recommendations of the Ipswich Wildlife Audit 2019 should also be considered for inclusion in future development.

In addition design advice has been included including the need for a landscaping buffer.

92. IP147 – Land between railway junction and Hadleigh Road

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26090	Suffolk County Council	Highways: - Potential foot/cycle bridge landing near former flood gate represents opportunity to improve sustainable access. - Site is likely to have a significant on junction already under strain and junction (capacity) enhancement may be necessary to avoid cumulative residual severe impact.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The site is now under construction and therefore it is no longer allocated.

93. IP150c – Land south of Ravenswood

Representations	Comments	Object	Support
3	2	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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26091	Suffolk County Council	<p>Highways:</p> <ul style="list-style-type: none"> - Contrary to town centre first policy for offices. - Site IP152 needs access most likely through a junction to the A1189 through this site. - It does not appear that safe and sustainable access and be made to the site. - Left-in left-out access through IP150b required to mitigate impact - Foot way along perimeter track represents opportunity for sustainable access improvement. - Site is likely to have a significant impact on junctions already under strain and junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact.
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25847	Ravenswood Environmental Group	<p>The Land Adjacent to Nacton Road does not appear in the SA and the site sheet for site IP150e suggests that this site should be masterplanned with IP150c but there is no policy to insist upon it. There should be a criteria based policy stating how the site can be delivered as part of a masterplan.</p>
26121	Ravenswood Residents Association	<p>Is the Access to this B1 site for offices etc. to be via the new IP150e 126 housing development? This would need to be master planned.</p> <p>The 3 phases of IP152, IP150e and Ip150c need to be coordinated and Master Planned with a second ACCESS/EGRESS point for Ravenswood, as with the existing single point of access into and out of Ravenswood already not coping at the specified times of day, then forward planning becomes an absolute must, otherwise grid-lock will come into play very rapidly.</p>

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

The allocation through policy SP5 has been clarified to exclude B1a office use, as it is a town centre use. It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements. It is confirmed that the site is considered through the sustainability appraisal published for this stage of the plan.

94. IP152 – Airport Farm Kennels

Representations	Comments	Object	Support
6	2	3	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26092	Suffolk County Council	Highways: <ul style="list-style-type: none"> - Does not appear that safe and sustainable access can be made to the site. - To mitigate this it would need to access through IP150a and b. - Diverting FP1 to crossing on Nacton Road represents a sustainable access improvement opportunity. - The site is likely to have a significant impact on junctions already under strain and junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact.
26157	Suffolk County Council	Recommended that an additional sentence has been added.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25811	AONB	The AONB team welcomes the requirement to assess the impact of developing this site on the Natural Beauty of the Suffolk Coast Heaths AONB. We would be happy to discuss the scope of an AONB impact assessment at the appropriate stage of the planning process for

		inclusion in the proposed Development Brief for this site.
25853	Ravenswood Environmental Group	The plan hints that the site may allow the creation of a new access onto and improvements to the Nacton Road. The Site Sheet sets out a raft of constraints, yet the site continues to be allocated for development. Alarmingly, the only guidance is that the industry should be as far from the A14 as possible meaning closer to residential. The site has archaeological, ecology, surface water, noise and air quality issues which dictate that it shouldn't be allocated. No work has been carried out to prove that this is a developable without harmful impacts on protected areas.
25854	Ravenswood Environmental Group	The plan hints that the site may allow the creation of a new access onto and improvements to the Nacton Road. The Site Sheet sets out a raft of constraints, yet the site continues to be allocated for development. Alarmingly, the only guidance is that the industry should be as far from the A14 as possible meaning closer to residential. The site has archaeological, ecology, surface water, noise and air quality issues which dictate that it shouldn't be allocated. No work has been carried out to prove that this is a developable without harmful impacts on protected areas.
26122	Ravenswood Residents Association	This is designated for - B1 (offices, R & D, light industrial) - B2 (general industrial) - B8 (storage/distribution) - And as a SECONDARY USE - Feasibility of a small section for Park & Ride It is recognised that this development currently poses ACCESS constraints - which would also need to be master planned comprehensively with the aforementioned IP150e and IP150c mentioned above. IP152, IP150e and IP150c need to be master planned with second access point for Ravenswood.

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners
Members of the public

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

The Council welcomes the AONB team's response to discuss the site further. It is accepted that there are highway issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues.

Locating a small park and ride site would be advantageous and help to mitigate transport impact on Ipswich. It is not accepted that this allocation is unsuitable for the uses proposed. The Council will balance the needs to protect residential amenity with the needs of the AONB and highway requirements. Additional text has been added to the site sheet to reflect the findings of the HRA to read: 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

95.IP005 – Former Took's Bakery, Old Norwich Road

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26093	Suffolk County Council	<p>Highways:</p> <ul style="list-style-type: none"> - It does not appear that safe and sustainable access can be made to the site - Land required for junction vehicular capacity and pedestrian and cyclist improvements as a likely mitigation measure. - Toucan facilities represent an opportunity to improve sustainable access. - The site is likely to affect a location with a significant number of recorded accidents (Bury Road/ Old Norwich Road). - The site is likely to have a significant impact on junctions already under strain and junction (capacity) enhancements are not likely to be necessary to avoid cumulative residual severe impact.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public**How these comments have been taken into account in the Final Draft Local Plan:**

This site has planning permission and is currently being developed.

96.IP051 – Old Cattle Market, Portman Road - South

Representations	Comments	Object	Support
0	0	0	0

Statutory Consultees

The following made no comments in response to this issue.

Statutory Consultees**Parish and Town Councils****Other Organisations****Developers and Landowners****Members of the public****How these comments have been taken into account in the Final Draft Local Plan:**

Additional design advice from the Urban Design and Conservation Team has been inserted into the site sheet.

97.IP150b – Land at Ravenswood

Representations	Comments	Object	Support
4	3	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26094	Suffolk County Council	<p>Highways:</p> <ul style="list-style-type: none"> - It does not appear that safe and sustainable access can be made to the site. - Access through IP150a or via perimeter track following major scheme for sites 150c, 152d and 152. - Provision of footway along perimeter track is an opportunity to improve sustainable access. - Site is likely to have a significant impact on junctions which are already under strain and junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25846	Ravenswood Environmental Group	The Plan does not qualify/ explain what the Sports Park is. The SA suggests this is just open green space that can sit comfortably with an adjacent Nature Reserve and SPA but it may be that built development, traffic, parking, lighting, evening activities and noisy activities. Plans should serve a clear purpose. If it's for predominantly open space then a Sports Park should be in Policy SP6. Residents are entitled to read the Local Plan and have certainty as to what is permissible here. The site is valued as a green space and for its ecological and visual value.
26123	Ravenswood Residents Association	ACCESS to this Sports Park site will also need to be specified, as presumably access from Alnesbourne Crescent would need to be made, it would appear, through the proposed new housing development on IP150d.
25634	Suffolk Wildlife Trust	Whilst we note that the allocation of this site for sports use is carried forward from the current adopted Local Plan this is regrettable. As recognised in the supporting sheet for the site, it is an area of wildlife value and forms part of the ecological corridor on the south-eastern edge of the town. Proposals for any sports facilities on this site must be informed by survey and assessment of all of the ecological receptors likely to be impacted by the development. Appropriate ecological mitigation and enhancement measures must be embedded as part of any proposal.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

It is acknowledged that the site has access issues. A transport assessment would be a requirement for any future planning application to clarify and address highway issues and the site sheet already refers to the need for master planning with the site IP152 to the south in order to address the access constraints. The wording has been

strengthened and extended to explicitly refer to other allocations at Ravenswood, state that junction (capacity) enhancements could be necessary to avoid cumulative residual severe impact and emphasise the need for sustainable access improvements.

Additional text has been added to the site sheet to reflect the findings of the HRA to read: 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.'

The sports facilities needed for the park are yet to be identified and this is tied up with the current sports provision review being undertaken by the Council. However, the site sheet flags up the ecological considerations.

98. Policy SP8 – Orwell Country Park Extension

Representations	Comments	Object	Support
4	1	2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25769	Natural England	The LPA should be confident that Policy SP8 will be effective in offsetting recreational impacts to the designated Orwell Estuary. The success of the park extension will depend on the details of the proposal. We advise that these details are assessed to ensure the project is fit for purpose. We would encourage Policy SP8 to include appropriate provision such as access to the coast path across this land. The England Coast Path will be subject to its own HRA, separate from Ipswich Borough Local Plan. Currently in discussion with Ipswich Borough Council about the coast path route in this area.
26095	Suffolk County Council	Highways: - Public Rights of Way dedication represents opportunity to improve sustainable access.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25815	AONB	The AONB team fully supports policy SP8 to include Pond Hall Carr and Farm into the

		existing Orwell County Park. Including this land, as well as providing additional new habitat, will increase recreational opportunities with the Country Park. This could potentially alleviate recreational pressure on the Orwell Estuary Special Protection Area.
25856	Ravenswood Environmental Group	Extension does not resolve existing poor management. Motorcycles ridden on the foreshore and dogs running free. The development of land at Ravenswood adds to visitor pressures but no mitigation. Contradiction at 4.38 because the development at Ravenswood mustn't have an impact on the SPA yet seeks to improve footpaths/ viewpoints while discouraging access. Existing residents do not want access to the Orwell restricted while tolerating disproportionate growth. Country Park remains accessible by unauthorised vehicles and suffers fly-tipping and vandalism. The cause of this is proximity with residential and the solution lies with better management and greater distance to residential.

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners
Members of the public

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

The Plan has been subject to assessment under the Habitat Regulations to ensure no significant effects on the Special Protection Area resulting from the country park proposal. The proposal at Pond Hall Farm has the purpose of managing recreational impacts more effectively by providing circular walking routes away from the shore, but still offering longer distance views across the estuary.

The decision about whether to dedicate the routes as rights of way would be taken once they are established outside the scope of the plan.

The proposal at Pond Hall Farm has the purpose of managing recreational impacts more effectively by providing circular walking routes away from the shore, but still offering longer distance views across the estuary.

99. Policy SP9 – Safeguarding land for transport infrastructure

Representations	Comments	Object	Support
4	3	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26022	Suffolk County Council	County would welcome the opportunity, as part of a broader discussion to promote sustainable transport, to discuss these proposed measures such as Park and Ride sites and improved sustainable links such as pedestrian/cycle bridges as means of developing a holistic package of improvements.
26096	Suffolk County Council	Highways: - In relation to the two park and ride sites (Anglia Parkway & IP152) it should be noted that Suffolk County Council are not proposing to fund these services.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25810	AONB	Any future development especially site IP141a should be supported by an assessment of impacts on the Natural Beauty of the AONB. This includes use as a Park and Ride site as indicated in para 4.4 of Policy SP9 The need for such an assessment should be reflected in any future site-specific policy for this site. The AONB team would be happy to discuss the scope of the AONB impact assessment at the appropriate stage of the planning process.
25890	Associated British Ports	For the reasons set out in respect to CS&P DPD Review Policy CS20 (and para 8.225) and in respect of Site Allocations & Policies DPD Policy SP2 (IP037), we request the removal of the reference to "additional vehicular access needed to enable the site's development".

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public**How these comments have been taken into account in the Final Draft Local Plan:**

The Council is in discussions with Suffolk County Council and neighbouring districts to identify measures needed to support growth, and a mechanism for gathering developer contributions for transport. The added text makes this clear.

The plan is looking ahead to 2036. By then the operation of park and ride services from either location mentioned in the policy could form a key component of a sustainable travel strategy. Therefore, the option needs to be retained and this means protecting the site(s).

IP141A Futura Park is separated from the AONB by over 500m, which includes the Ravenswood Development, Ransomes Europark and the A14. Therefore, a requirement to undertake an impact assessment would be unreasonable. However, this requirement has been added to the development allocation IP152 Airport Farm which lies adjacent to the AONB and includes a small section of the AONB.

It is the Council's understanding that additional access is required by the Highway Authority to enable the Island Site to come forward for development.

100. IP037 – Island Site

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26023	Suffolk County Council	The cancellation of TUOC will necessitate an amendment to this policy in respect of IP037. The County Council has committed £10.8m to contribute towards delivering crossings at Felaw Street (formerly known as Crossing B) and another at the Prince Phillip Lock (formerly known as Crossing C) to help enable the delivery of the Island site.

The following made no comments in response to this issue.

Parish and Town councils

Other Organisations

Developers and Landowners

Members of the public

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

The Upper Orwell Crossings project is not referred to in the policy, which retains the 'Wet Dock Crossing' title from the adopted Local Plan. This aligns with the explanatory text to policy CS20, which explains the relationship between the two crossing proposals.

The comments from the Archaeology Unit have been incorporated into the site sheet.

The Council does not propose at this time to increase the site's indicative capacity above 421 dwellings, as the Council wishes to retain the existing employment uses at Haven Marina and provide a minimum of 15% amenity space on the site. However, as noted by ABP 421 is the indicative capacity and the site will be subject to a detailed master plan. The site sheet has expanded the information on the master plan and associated expectations.

The Council is working with neighbouring authorities to understand the cumulative impact on the highways network of growth in the local plan to 2036 using the Suffolk County Transport Model, a strategic highway model. Through the work the Council is developing a programme of mitigation. The site is sustainably located close to public transport and jobs and facilities.

The need to take account of the River Corridor Buffer (10m from the river) has now been identified on the site sheet.

The need to enable greater recreational, leisure and sports use of the River has been stated on the site sheet.

The footpaths and safeguarded minerals facility (within 250m) have been earmarked on the site sheet for reference.

In addition, the site sheet also refers to the need for a contaminated land assessment.

In order to ensure that the development principles outlined in Opportunity Areas are adhered to in their future development, appropriate reference has been included to Policy CS3. Additional text has been added to the Site sheet to read: read 'The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.' To reflect the findings of the HRA.

101. Chapter 5 – IP-One Area

Representations	Comments	Object	Support
2	1	0	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25966	Environment Agency	Paragraph 5.19 states that "the flood defence barrier is important for the release of development sites at the waterfront (and the wider area in the flood zone). It has been largely completed in 2018." The Ipswich Flood Defence Management Strategy (IFDMS) is now complete and the Tidal Barrier is operational. The final commissioning of the main barrier and all the associated gates has been completed. There remains a residual risk of tidal flooding and there is also a residual risk of fluvial flooding as well as a risk from other sources of flooding to consider as well.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25831	Cardinal Lofts (Mill) Ltd	The Company supports the general vision for the IP-One area (see also representation made with respect to Core Strategy Chapter 6: Vision and Objectives and Spatial Strategy).

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

Paragraph 5.19 has been amended to confirm that the flood defence barrier has been completed.

102. Policy SP10 – Retail site allocations

Representations	Comments	Object	Support
3	0	1	2

Parish and Town Councils

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26034	Sproughton Parish Council	Expresses concerns about extra traffic being generated through Sproughton Village, which is already over congested, by changes in use proposed for the Boss Hall area as proposed B class employment land. Although much traffic can access from the A14 junction, for traffic from the rural areas to the West such as from Hadleigh the only logical route is through Sproughton and the Wild Man Junction.
26037	Sproughton Parish Council	The Council liked the fact that redundant sites are coming up in the new local plan, such as the old Mecca Bingo site in central Ipswich. This should be encouraged further to avoid the use of building on greenfield in villages when there isn't the sustainability or need to do so.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25697	Boyer on behalf of East of England Co-Operative Society	The exact location of the proposed retail allocation at Boss Hall Road does not appear to have been identified by the Council. The Society support this new retail allocation at the Boss Hall Business Park. Four A1/A3 retail units are proposed as part of planning application reference 18/00848/OUTFL comprising a total of 448 sq. m, adjacent to Sproughton Road. Policy SP10 should be updated to reflect this as the location for the retail allocation.

The following made no comments in response to this issue.

Statutory Consultees

Other Organisations

Members of the public

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

The Highway Authority did not raise any objection to the proposed District Centre at the Boss Hall Industrial Estate. The Planning and Development Committee resolved to grant planning permission (18/00948/OUTFL) on 24 July 2019, subject to completion of a S106 agreement, for the uses and development associated with the district centre here. Suffolk County Council also raised no objection to the proposal

subject to various transport/ highways related conditions, including a Traffic Regulation Order to improve waiting times at junctions nearby and a Travel Plan. In addition, the district centre would primarily serve residents within walking and cycling distance of the site. It would not be of such a scale as to serve a wider catchment, such as an out-of-town retail park.

The Council will continue to identify redundant sites where available and seek to maximise effective use of brownfield land whenever possible as required under paragraph 118(c) of the National Planning Policy Framework (2019).

The location of the Sproughton Road District Centre has been more clearly defined on the Proposals Map to reflect permission 18/00948/OUTFL which has received a resolution to grant planning permission since the Preferred Options version of the Local Plan. It also recognises the development permitted for a retail foodstore approved under permission 15/00105/FUL.

The policy text has been amended to match the net floorspace of the retail allocation at the Sproughton Road District Centre with the retail development proposed under permission 18/00948/OUTFL. The net figure of 315sq m net was formulated on the basis of the Retail Assessment (Boyer) dated September 2018 which accompanied permission 18/00948/OUTFL.

103. IP347 – Mecca Bingo

Representations	Comments	Object	Support
0	0	0	0

No comments were made

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

Additional comments from the Urban Design and Conservation Team have been incorporated into the site sheet.

104. IP348 – Upper Princes Street

Representations	Comments	Object	Support
0	0	0	0

No comments were made

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

Additional comments from the Urban Design and Conservation Team have been incorporated into the site sheet.

105. Policy SP11 – The Waterfront

Representations	Comments	Object	Support
2	0	0	2

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25891	Associated British Ports	ABP supports Policy SP11 and welcomes the recognition at para 5.21 of the need for new development to take account of the Port's operational needs.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25832	Cardinal Lofts (Mill) Ltd	The Company fully supports this policy.

The following made no comments in response to this issue.

Parish and Town Councils**Statutory Consultees****Members of the public****How these comments have been taken into account in the Final Draft Local Plan:**

No changes.

106. Policy SP12 – Education Quarter

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this policy.

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

No changes.

107. Policy SP13 – Portman Quarter (formerly Ipswich Village)

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this policy.

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

No changes.

108. Policy SP15 – Improving pedestrian and cycle routes

Representations	Comments	Object	Support
3	0	2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25579	The Theatres Trust	As referenced within our formal response to recent planning applications and within our representation on the draft Public Realm Strategy submitted alongside these comments we are supportive of efforts to improve the environment and pedestrian connectivity and permeability around the New Wolsey Theatre.
26001	Suffolk County Council	County will discuss these measures specifically with IBC, as part of work to determine a package of measures to promote healthy and sustainable travel, and ensure the Plan is deliverable. Pedestrianisation of some roads in the town centre may be desirable, but this would need to be tested for impacts on other modes (such buses) and for wider highway impacts. Should be more specifically linked to public rights of way opportunities and should include wording to the effect of: Linkages and enhancements to the public rights of way network beyond Ipswich. Comments on specific sites are included in Appendix 4.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25833	Cardinal Lofts (Mill) Ltd	The Company supports the general thrust of the Policy, including the proposals to improve

		pedestrian links between the Central Shopping Area and the Waterfront. However, there are serious concerns about how these proposals impact upon the development of Site IP035 (see representations relating to the Merchants Quarter).
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The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

The policy is extended to cover Ipswich-wide measures, to ensure that they are listed and link up with policy SP9 which safeguards the land needed for their delivery. The principle of seeking public rights of way enhancements linked to development is addressed primarily through policy DM21. Reference has been added to cross boundary links to the rights of way network, for completeness. The need for improved walking routes between the Waterfront and Central Shopping Area is an objective of the adopted Local Plan and the Opportunity Area B development option map illustrates one way in which it could be delivered through routes around site IP035.

Regarding pedestrianisation options, more detailed forthcoming plans and strategies such as the Local Transport Plan update and the Walking and Cycling Infrastructure Strategy will provide the mechanism through which to consider impacts.

109. Policy SP16 – Transport proposals in IP-One

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26024	Suffolk County Council	Following the recent announcement on TUOC, the County continues to support provision of increased east-west capacity. However, the measures set out in this policy (and as shown on the policies map) are not necessarily the same proposals as set out in SP9 and relate to untested routes which may not be deliverable. We would be pleased to discuss this further.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25892	Associated British Ports	ABP supports Policy SP16 and notes the comments at para 5.47 in respect of IBC's continuing aspirations for a Wet Dock Crossing (see comments on CS&PDPD Policy CS20). For the reasons given above, we request the removal from para 5.47 of the reference to "which as a minimum will require a road bridge from the west bank to the Island Site..".

Parish and Town Councils Developers and Landowners Members of the public

No comments were made in response to this issue.

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

The policy has been amended to bring the policy up to date to reflect the Highway Authority's work on the feasibility of the Upper Orwell Crossings, and their decision not to proceed with all the components of the Upper Orwell Crossings project.

It is the Council's understanding that additional access is still required to enable the redevelopment of the Island Site. The policy and supporting text set out the minimum improvements needed to enable development, but some minor updates have been made to ensure this is clear.

110. Policy SP17 – Town Centre car parking

Representations	Comments	Object	Support
3	0	2	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26154	Suffolk County Council	IP049: This is in character zone 2b in the SPD. Comments could be moderated, with an amended last paragraph relating to archaeology as suggested.
26025	Suffolk County Council	Provision of car parking is complicated, reflecting the need to balance support for

		<p>economic vitality with managing congestion and air quality. This matter needs further consideration as part of our broader discussions on maximising sustainable transport opportunities.</p> <p>The proposals to encourage redevelopment of the temporary car parks, through preventing renewal of parking permissions, is welcomed. County would welcome discussion on how evidence will be used to manage the process by which permissions are refused. Consideration should be given to extent of central parking core. For example, it isn't clear why the western side of Princes Street is excluded.</p>
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Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25816	AONB	The AONB team welcomes the requirement in policy SP17 for all new permanent car parks to include electric vehicle charging points. This will help meet objective 11 in the emerging Local Plan.

The following made no comments in response to this issue.

Parish and Town Councils

Developers and Landowners

Members of the public

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

The policy has been updated to reflect the Ipswich Parking Strategy which advises on the number of additional parking spaces needed and where they should be located. The site sheet for site IP049 has been amended as requested in relation to archaeology.

111. Opportunity Areas A – Island Site

Representations	Comments	Object	Support
1	0	1	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25893	Associated British Ports	<p>ABP questions the references in the text to:</p> <ul style="list-style-type: none"> * Residential 50% (IP037 says c.70%) * Generally low to medium rise development (3, 4 and 5 storeys) (IP037 say minimum 100dph density) * Development to provide vehicular access (including emergency vehicles) and bridge across New Cut to link to Mather Way * Layout to facilitate location of new foot/cycle bridge from New Cut to St Peter's Wharf (it is not clear what this means) * Ensure suitable public transport provision (it is not clear how this is expected to be achieved) <p>Request removal of "3, 4 and 5 storeys".</p>

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

The comments from the Archaeology Unit have been incorporated into the site sheet.

The Council does not propose at this time to increase the site's indicative capacity above 421 dwellings, as the Council wishes to retain the existing employment uses at Haven Marina and provide a minimum of 15% amenity space on the site. However, as noted by ABP 421 is the indicative capacity and the site will be subject to a detailed master plan. The site sheet has expanded the information on the master plan and associated expectations.

The Council is working with neighbouring authorities to understand the cumulative impact on the highways network of growth in the local plan to 2036 using the Suffolk County Transport Model, a strategic highway model. Through the work the Council is developing a programme of mitigation. The site is sustainably located close to public transport and jobs and facilities.

The need to take account of the River Corridor Buffer (10m from the river) has now been identified on the site sheet.

The need to enable greater recreational, leisure and sports use of the River has been stated on the site sheet.

The footpaths and safeguarded minerals facility (within 250m) have been earmarked on the site sheet for reference.

In addition, the site sheet also refers to the need for a contaminated land assessment.

112. Opportunity Areas B – Merchant Quarter

Representations	Comments	Object	Support
2	0	2	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25983	Suffolk County Council	Ancillary routes should acknowledge historic routes and features as appropriate (in order to aid public understanding and appreciation of heritage).

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25834	Cardinal Lofts (Mill) Ltd	The Company controls three of the most important sites (IP035, IP206 and IP211) in the Merchants Quarter and is concerned that the Development Options plan, together with the Development Principles will render development unviable and frustrate proposals to bring forward sites. Whilst the Company does not take issue with the objectives for the Merchants Quarter, it is of the view that: <ul style="list-style-type: none"> - North-South linkages through IP035 are wrongly located; - Proposed for a new 'urban focal space' on IP035 are oversized and over ambitious; and - IP035 is capable of accommodating greater than five storeys without adversely impacting heritage assets.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Members of the public

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

This is an important Waterfront area which has been planned through site analysis to ensure that urban design issues are taken into account in the overall development area to ensure a continuity throughout. The opportunity area incorporates a number of allocated sites. Principally IP035, IP206 and IP211, IP043; IP011; IP054 and any potential developer in this area should also consult these site sheets in order to gain knowledge of site constraints and requirements.

Where necessary, utilities infrastructure is referred to. No change.

113. Opportunity Areas C – Mint Quarter/ Cox Lane regeneration area and surrounding area

Representations	Comments	Object	Support
3	1	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25580	The Theatres Trust	We are supportive of the objectives set out for this area, in particular improvements around Major's Corner which would enhance the environment around the Regent.
25982	Suffolk County Council	The reference to the scheduled monuments in the Development Principles section could be extended to say 'Development to address Scheduled Monuments and archaeology, including conservation principles and, where relevant, mitigation for impacts on archaeological remains and enhancement of public understanding'

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25895	Private individual	The owners of Bond Street Garage and the car park behind to the rear of 67 Upper Orwell Street would like you to consider the development potential of this area in relation to the Mint Quarter.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations Developers and Landowners

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

The development principles have been amended in response to the suggestion made by the Archaeology Team at Suffolk County Council. This revised wording provides greater clarity for developers on the archaeological considerations of the site.

Officers have been in discussion with the owners following their submission promoting the Bond Street Garage and car park to the rear. However, whilst officers are broadly supportive of the principle of development, as the site is less than 0.1ha and is unlikely to be able to accommodate a capacity of 10 or more dwellings, it does not meet the threshold for including as a specific allocation in the IP-One area.

114. Opportunity Areas E – Westgate

Representations	Comments	Object	Support
2	0	1	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25581	The Theatres Trust	Again, we are supportive of improvements to the public realm and environment around New Wolsey Theatre. We would encourage engagement with the Trust on such proposals.
25984	Suffolk County Council	Ancillary routes should acknowledge historic routes and features as appropriate (in order to aid public understanding and appreciation of heritage).

The following made no comments in response to this issue.

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

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

An additional development principle has been included as requested by the Suffolk County Council Archaeology Team. This will help to ensure the heritage value of the area is preserved and enhanced.

115. Opportunity Area H – Holywells

Representations	Comments	Object	Support
N/A	0	0	0

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

This is a new Opportunity Area inserted to cover the cluster of site allocations (IP042, IP045, IP064a, IP098 and IP226) around the Holywells Road area.

116. Chapter 7 – Implementation, Targets, Monitoring and Review

Representations	Comments	Object	Support
N/A	0	0	0

No comments were made on this chapter.

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

No changes.

117. Appendix 1 – A summary of the tests of soundness

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

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

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

No changes

118. Appendix 2 – A list of policies contained in this document

Representations	Comments	Object	Support
0	0	0	0

The following made no comments in response to this issue.

Statutory Consultees

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

Policy SP4 and Opportunity Area H have been inserted into the list.

119. Appendix 3 – Site Allocation Details

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25711	Anglian Water	Consider there is a need distinguish policy requirements relevant to Anglian Water's existing infrastructure as set out in existing text and clarify the status of Appendix 3 for decision making.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The site sheets provided in Appendix 3A is for information only; land allocations are made through the policies in the plan. This is explained in Appendix 3.

Documents for Download

1. Documents for Download

Representations	Comments	Object	Support
27	0	25	2

2. Strategic Environmental Assessment and Sustainability Appraisal (includes Non-Technical Summary)

Representations	Comments	Object	Support
11		10	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25770	Natural England	Satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive and guidance. Advise that further updates to the SA should ensure a robust assessment of the environmental effects of plan policies and allocations on statutorily designated sites and landscapes including the Orwell Estuary SPA, SSSIs and the Suffolk Coast and Heaths AONB, considering our advice and the findings of the evolving HRA. The SA will need to identify appropriate mitigation to address any adverse impacts to designated sites and landscapes and other aspects of the natural environment.
25760	Natural England	The effects on local roads and the impacts on vulnerable sites from air quality effects on the wider road network should be assessed using traffic projections and the 200m distance criterion. The designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants. The results of the assessment should inform updates to the SA, which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25877	Save our Country Spaces	<p>It is too early to comment on the SA report for the following reasons:</p> <ol style="list-style-type: none"> 1. No SA of IBCs decision not to comply with air quality guidance. 2. No SA of IBC's non-adherence to government guidance for AQAP and lack of target to reduce air pollution. 3. No traffic modelling without TUOC for the IGS development 4. No sewage infrastructure plan/ proposals. 5. No air quality modelling/ assessment 6. No air quality or noise assessment on rail. <p>Lack of appraisal of the impacts of building on land at Humber Doucy Lane Updated SA is required to consider these issues.</p>
25871	Save our Country Spaces	<p>The SA is unsound as it doesn't utilise the best available baseline and modelling data housing projections nor the ONS migration data, which significantly lower the objectively assessed housing need.</p> <p>The earlier SA highlights the lack of information and uncertainty in assessing the effects on traffic, air quality and climate change of circa 4000 homes to be built and exposes a hole.</p> <p>The plan fails to demonstrate that IBC can secure the required compliance.</p> <p>The SA fails to take adequate account of issues including the viability of the IGS due to the severe impact on traffic and limited sewage infrastructure.</p>
25870	Save our Country Spaces	<p>The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.</p>
25863	Save our Country Spaces	<p>The SEA Directive requires that the assessment include identification of</p>

		cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.
25862	Save our Country Spaces	<p>The SA is unsound as it doesn't utilise the best available baseline and modelling data housing projections nor the ONS migration data, which significantly lower the objectively assessed housing need.</p> <p>The earlier SA highlights the lack of information and uncertainty in assessing the effects on traffic, air quality and climate change of circa 4000 homes to be built and exposes a hole.</p> <p>The plan fails to demonstrate that IBC can secure the required compliance.</p> <p>The SA fails to take adequate account of issues including the viability of the IGS due to the severe impact on traffic and limited sewage infrastructure.</p>
25839	Ravenswood Environmental Group	<p>The traffic-light scoring system used is inaccurate insofar as it relates to various sites within Ravenswood. The SA is also not consistent with the SHEELAA which again uses a traffic-light scoring system and incorrectly scores sites which are known to have negative issues. The SA results of each of the sites pertaining to the Ravenswood locality are questioned (IP150a, IP150b, IP150c (omitted), IP150d, IP150e and IP152).</p> <p>The SA does not assess sites cumulatively. These sites cumulatively have a negative impact on the SPA and visitor pressure is already too great and associated management too poor to allow further development here.</p>
25684	Northern Fringe Protection Group	<p>Too early to comment on the SA due to:</p> <ul style="list-style-type: none"> - No assessment of the proposed non-adherence to Government Guidelines for housing assessment and the alternative strategy; - No SA of IBCs decision not to comply with air quality guidance; - No SA of IBC's no adherence to government guidelines for AQAP and lack of target; - No sewage infrastructure plan/ proposals and

		<p>no impact assessment;</p> <ul style="list-style-type: none"> - No air quality modelling/ assessment of road and rail transport; - No noise assessment of rail; - No Sizewell C impact assessment; - Review of Ipswich Retail; <p>Lack of appraisal of Humber Doucy Lane</p>
25666	Northern Fringe Protection Group	<p>The Sustainability Assessment is incomplete and underplays many key issues. It needs to fully assess air quality impacts, the impacts of the additional road infrastructure required to prevent junctions reaching capacity and the impacts of the new sewage infrastructure that will be required to deliver the Core Strategy. It needs to consider the adoption of Governments guideline target of 445 dwellings per annum as an option.</p> <p>The SA needs to fully assess the implications of building on the Humber Doucy Lane site and whether delivering more homes in the Town Centre instead of retail might be more sustainable.</p>

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26116	Private individual	<p>Fails take adequate account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of the 'Garden Suburb', in combination with other cross-boundary proposals, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure. The plans are unsound and do not comply with the NPPF.</p> <p>The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10. Appears that environmental, social and economic effects of the plan(s) are inadequately/ inaccurately assessed against HRA and the SAs "Serious adverse effects" have not been properly identified.</p>

The following made no comments in response to this issue.

Parish and Town Councils
Developers and Landowners

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

The Sustainability Appraisal has been amended significantly as part of the Final Draft Local Plan which will address these comments in part. Overall though the Council considers that the process has been carried out in accordance with the relevant legislation.

Both a Health Impact Assessment and a Habitats Regulations Assessment have been undertaken. These are separate to the SA.

A local centre has not been incorporated into ISPA4. It is considered that with the improvements to the sustainable transport modes likely from any development that the nearby IGS district centre and other local centres will provide sufficient amenities for future occupiers.

The SA, at a strategic level, has assessed every option, policy and site allocation in the Plan for its likely impacts on air quality.

New infrastructure proposed in the Plan, such as new roads, have also been assessed for their likely sustainability performance – including impacts on air quality. Where new roads are proposed the SA recognises that this could help to alleviate congestion in some locations, thereby reducing the number and frequency of idle cars, but it could also potentially lead to a net increase in road traffic with subsequent impacts on air quality. See the assessment of Policy CS10 in Appendix D as an example.

Separate to the SA, the Council have carried out detailed transport and air quality assessments (see response to Policy DM3). Results in the SA are consistent with the results of these assessments.

The Government Guideline target of 445 dwellings per annum has been assessed as an option. See the assessment of Alternative Scenario D in Appendix C of the SA.

Option 3 (re-use of existing land/ uses) has been considered but was not selected as option 1 was deemed more appropriate. There are a limited number of town centre retail sites which by their nature need to be located in the town centre to meet other objectives of the plan.

Each option, policy and site allocation has been assessed for their potential impacts on air quality (i.e. SA Objective 7- To maintain and where possible improve air quality).

During the assessments of options, policies and sites against SA Objective 4 (To improve the quality of where people live and work), the potential risk of people being exposed to disturbances such as noise pollution (including rail) has been considered.

Sizewell C is approximately 35km north east of Ipswich and is considered to be outside the area of search for relevant plans and programmes that could have a cumulative impact with the Ipswich Plan.

In SA and SEA it is necessary to carry out assessments based on the best available information. This has been done in each case. However, the SA plays no role in calculating housing numbers or the OAN. The SA is intended to predict and evaluate the sustainability impacts of the different housing options that are identified by the Council.

A range of different housing options have been assessed in Appendix E. The sustainability information for each one has helped to inform the Council's decision making with regards to the quantity of development to pursue in the Plan.

The SEA Directive necessitates that the Environmental Report highlights where there is uncertainty in the assessment. Chapter 3 of the SA, which explains the methodology of the assessments in the SA, therefore indicates how and why there are uncertainties in some of the assessments. Each assessment of policies and sites in the appendices explicitly states whether there is considered to be a high, medium or low degree of uncertainty behind the assessment.

Uncertainties are an inherent part of assessments in a Plan's SA, in part due to the length of time over which the Plan will be in place and the potential for unforeseen circumstances to arise. Assessments in the SA therefore adopt a precautionary approach (i.e. in the face of uncertainty, what's the worst case scenario?) and in Chapter 4 proposes a monitoring framework which would help to ensure that the effects predicted and evaluated in the SA do arise and that any avoidance or mitigation measures adopted by the Council are as effective as planned.

The SA/SEA considers the impacts of each policy and site in the Plan on sustainable transport in Ipswich. The Garden Suburb, through the assessment of Policy CS10, has been assessed at a high and strategic level for its impact on the objective of encouraging efficient patterns of movement, promoting sustainable travel of transport and ensuring good access to services.

Policies in the Plan commit the Council to ensuring that necessary infrastructure would be in place, and have appropriate capacity to accommodate new development, prior to new development taking place.

It should also be noted that viability is not an issue tackled in SA.

All options have been assessed for their likely impacts on air pollution as well as designated sites. The SA has also carried out a cumulative effects assessment of the Plan and ruled out significant effects on a European designated site as well as air quality on the whole.

Assessments against the transport objective generally found that the Plan would be likely to enhance the sustainability of transport in Ipswich, following improvements to public and active transport options.

It is considered that the only road that could feasibility impact the SPA through nitrogen deposition would be Orwell Bridge A14. The Council have carried out detailed air quality and transport modelling and assessments separate to the SA which have been better placed to determine the impacts of the Plan on traffic on the A14. In line with the transport assessment, should the proposed mitigation measures be adopted then the A14 would be able to cater for the anticipated increases in traffic. As per the HRA, significant effects on the SPA would not arise.

It should also be noted that the only site allocation within the Plan that is within 200m of the SPA is the proposed country park extension at Pond Hall Carr and Farm. It is likely to prove beneficial to the SPA that this land has been designated as a country park extension.

APIS was used to determine the critical loads for the Stour and Orwell Estuaries SPA. Given the lack of impacts on the SPA, no mitigation measures have been considered to be necessary through the SA/SEA.

In the case of determining whether the Plan would lead to a significant effect on a European designation, the SEA has acted in conformity with the findings and recommendations of the HRA process.

The SA has considered the potential impacts of all options considered during the preparation of the Plan on statutorily designated sites, as well as protected species and habitats and also overall ecological connectivity. Where impacts have been identified, appropriate measures have been recommended.

The SA/SEA provides a cumulative assessment of all options in the Plan in Chapter 3 of the main report.

This assessment is in conformity with the outcomes of the HRA, which provides a detailed assessment of the Plan (including cumulatively) on European designations (i.e. the SPA).

Transport, air quality and economy each have their own dedicated SA Objective in the SA Framework, against which all options, policies and sites have been assessed. It should be borne in mind that the SA operates at a high and strategic level and is not capable to carrying out detailed transport modelling exercises. Detailed transport and air quality assessments have been carried out separate to the SA. The assessment results in the SA, whilst operating at a more strategic level, are consistent with the results of the more detailed assessments commissioned by the Council.

The Plan commits to ensuring that appropriate infrastructure, including for sewage, is in place with the necessary level of capacity, prior to development proceeding.

Each option, policy and site has been assessed for its likely impact on the causes of climate change (i.e. carbon emissions) as well as its impact on the vulnerability of local receptors to the impacts of climate change (e.g. flood risk).

Recommendations have been made in each case for reducing the carbon footprint of proposals, such as ensuring good sustainable transport options and energy efficient buildings.

The location of sites allocated by the Council conforms with national planning law on flood risk.

3. SEA and Sustainability Appendices A – E

Representations	Comments	Object	Support
3	0	3	0

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25852	Ravenswood Environmental Group	IP150d+e: No justification for reverting from employment to housing. Traffic impact not assessed. Nothing to rule out piecemeal applications. It is visually and ecologically connected to the adjacent nature reserve. Density is higher than surroundings. Existing green infrastructure should be preserved. Need for green infrastructure will increase density. Vagueness about how it will come forward. Without a comprehensive and cumulative assessment of all proposals in this area the piecemeal developments would exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality. A comprehensive proposal must be subject to EIA. Referred to as brownfield but clearly greenfield.
25848	Ravenswood Environmental Group	IP150C – The Land Adjacent to Nacton Road does not appear in the SA and the site sheet for site IP150e suggests that this site should be masterplanned with IP150c but there is no policy to insist upon it. There should be a criteria based policy stating how the site can be delivered as part of a masterplan.

25840	Ravenswood Environmental Group	The traffic-light scoring system used is inaccurate insofar as it relates to various sites within Ravenswood. The SA is also not consistent with the SHEELAA which again uses a traffic-light scoring system and incorrectly scores sites which are known to have negative issues. The SA results of each of the sites pertaining to the Ravenswood locality are questioned (IP150a, IP150b, IP150c (omitted), IP150d, IP150e and IP152). The SA does not assess sites cumulatively. These sites cumulatively have a negative impact on the SPA and visitor pressure is already too great and associated management too poor to allow further development here.
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The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Developers and Landowners

Members of the public

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

The colour coded assessment approach applied to potential site allocations in Ravenswood is consistent with the approach used for all sites. The criteria used in the SHEELAA is different from that used in the SA. Typically, the colour coded system in the SA is intended to only be an indication of the assessment in order to allow rapid comparisons between sites. However, the assessment text should be referred to in order to understand how and why each colour was arrived at. It should be noted that the assessments of sites in Ravenswood has identified a mixture of both positive and negative potential sustainability impacts.

The assessment approach applied to each site was established during the SA Scoping stage, which was consulted on with statutory bodies, the general public and other stakeholders and subsequently amended in line with the responses received.

The assessment of site IP150c is now included in Appendix E.

4. Habitats Regulation Assessment

Representations	Comments	Object	Support
7	0	6	1

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25761	Natural England	The effects on local roads and the impacts on vulnerable sites from air quality effects on the wider road network should be assessed using traffic projections and the 200m distance criterion. The designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants. The results of the assessment should inform updates to the SA, which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment.
25742	Natural England	Satisfied that the HRA has provided a robust assessment of the Preferred Options. Natural England agrees that it is currently too early for the HRA to provide a conclusion that the plan will not lead to any adverse effects on European sites; however, we note that the screening of the Preferred Options has not identified any issues that flag a major concern that would significantly alter the direction and quantum of growth for the Borough. Welcomes recommendations for strengthening of policy wording and identification of key themes, including recreation, urbanisation, water and air quality, for detailed assessment through further stages.

Other Organisations

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25667	Northern Fringe Protection Group	The Habitats Assessment also needs to include the impacts of the additional road infrastructure required to prevent junctions reaching capacity and the impacts of the new sewage infrastructure that will be required to deliver the Core Strategy.

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
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26084	Mersea Homes Limited	The HRA which supports the Regulation 18 Local Plan consultation fails to offer clarity about the role of the Ipswich Garden Suburb Country Park within the RAMS regime, neither does it justify the exclusion of IGS sites from assessment under RAMS. The compartmentalisation of the IGS Country Park and RAMS should be justified if it is to be maintained, notwithstanding our view that the two means of mitigation should be integrated under a single approach, allied to the provisions of ISPA3.
26076	CBRE	The HRA which supports the Regulation 18 Local Plan consultation fails to offer clarity about the role of the Ipswich Garden Suburb Country Park within the RAMS regime, neither does it justify the exclusion of IGS sites from assessment under RAMS. The compartmentalisation of the IGS Country Park and RAMS should be justified if it is to be maintained, notwithstanding our view that the two means of mitigation should be integrated under a single approach, allied to the provisions of ISPA3.

Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26117	Private individual	Fails take adequate account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of the 'Garden Suburb', in combination with other cross-boundary proposals, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure. The plans are unsound and do not comply with the NPPF. The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10. Appears that environmental, social and economic effects of the plan(s) are inadequately/ inaccurately assessed against HRA and the SAs "Serious adverse effects" have not been properly identified.

The following made no comments in response to this issue.

Parish and Town Councils

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

The Council considers that the Habitat Regulations Assessment has been carried out in accordance with the relevant legislation.

5. Draft Strategic Housing & Economic Availability Assessment (SHELAA)

Representations	Comments	Object	Support
4	3	1	0

Developers and Landowners

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
26098	Salter and Skinner Partnership	<p>Development (113 dwellings) at Bourne End Nursery (IP034) is appropriate on brownfield site. Supports the government objective to boost housing on previously developed sites. Council does not have 5 year housing land supply.</p> <p>Sites in flood zone 2 can be developed for housing if there are no sequentially preferable sites, subject to exception test. There aren't other suitable sites to ensure the Borough has a suitable range of sites.</p> <p>The development can be made safe for its lifetime. Only minor shortcoming is partial-flooding of road but not dangerous enough for refusal.</p> <p>Allocate site for housing. (see appendix accompanying reports)</p>
25969	Boyer on behalf of Austin Street Projects Ltd	<p>The land at 68a Austin Street is vacant and secure. There is an intention to redevelop the site to deliver a high quality residential development, comprising predominantly of affordable housing.</p> <p>The site was submitted to the 2017 'Call for Sites' and it has been assessed within the draft SHELAA as being suitable, available (immediately) and achievable (within 5 years) for residential development (SHELAA Ref. IP309).</p> <p>Given the positive assessment through pre-application discussions, as well as through the draft SHELAA, the land at 68a Austin Street</p>

		should be included as an allocation for residential development within the emerging Local Plan.
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Members of the public

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25896	Private individual	The owners of Bond Street Garage and the car park behind to the rear of 67 Upper Orwell Street would like you to consider the development potential of this area in relation to the Mint Quarter.
25587	Private individual	Suggest that land accessible between 67-71 Upper Orwell Street IP4 1HP, which reaches from the rear of 65 to 75 Upper Orwell Street, and could include the premises at 42 Bond Street, is considered as a potential site. It would easily be able to accommodate at least 5 homes.

The following made no comments in response to this issue.

Parish and Town Councils

Statutory Consultees

Other Organisations

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

The 67 Upper Orwell Street site falls below the 0.1ha/ 10 dwelling threshold for allocation and has therefore not been included.

68A Austin Street has been included as an allocation.

The Bourne End Nurseries site is being assessed in terms of flood safety as part of the updated Strategic Flood Risk Assessment.

6. Plan 1 – District and Local Centres

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

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

No comments were made. The Grimwade Street Local Centre has been deleted from the map because there are plans to redevelop the parade of shops in the long-term and the Local Centre is to be removed as it no longer serves its original purpose in this location.

The proposed Sproughton Road District Centre has been shown on the map to reflect the granting of the permission 18/00948/OUTFL for commercial and retail uses on Boss Hall Road.

7. Plan 2 – Flood Risk

Representations	Comments	Object	Support
1	1	0	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25013	Suffolk County Council	It would be helpful if this plan of nationally-designated flood zones could highlight the fact that this relates to fluvial flooding, and that further information on surface water (pluvial) flooding can be found in the Strategic Flood Risk Assessment (SFRA).

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The Plan has been amended accordingly.

8. Plan 3 – Conservation Areas

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

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

No change.

9. Plan 4 – Archaeological Importance

Representations	Comments	Object	Support
1	0	1	0

Statutory Consultees

The following comments were made in response to this issue:

Rep. ID. No.	Respondent	Summary
25980	Suffolk County Council	The development of this Plan offers an opportunity to amend the AAI, in line with the Urban Archaeology Database Project (UAD) and assessment of Character Zones undertaken for the Supplementary Planning Document. The existing AAI was used to inform these zones, as was information in the UAD, and it may be most useful, clear to a developer and complementary to the SPD if the AAI reflects the core 'Zone 1' areas (see page 63 of the SPD). The County Council would be happy to discuss this point, with the Council and Historic England, and to provide any evidence.

The following made no comments in response to this issue.

Parish and Town Councils

Other Organisations

Developers and Landowners

Members of the public

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

The Borough Council is considering this point and will engage with the County Council further on this as appropriate.

10. Plan 5 – Ipswich Ecological Network

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

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

No change

11. Plan 6 – Green Corridors

Representations	Comments	Object	Support
0	0	0	0

No comments were made on this document.

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

No change

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7. Main issues from consultations

The main issues raised have been summarised below and grouped together based on themes that have been identified following the scrutiny of individual submissions.

Spatial Strategy - Growth

Comments regarding the Council's approach to its spatial strategy and levels of growth over the Local Plan period were received from a broad range of different respondents (e.g. Statutory consultees, interest organisations, private individuals). These were mainly focussed on the objectively assessed need for housing over the Local Plan period. However there was not a clear consensus from the representations as to what approach the Council should take. Some of the representations suggested that the housing figure set out in the Preferred Options (479 dwellings per annum/ 8,622 2018-2036) was not aspirational enough and should be increased, whilst on the other hand the Council was encouraged to adopt a more modest figure in line with new guidance in the standardised methodology (released after the Preferred Options was prepared).

There were also representations received regarding the Council's approach to economic growth. Unlike the disparity found between the representations on housing growth, the representations relating to economic growth were more consistent in that the approach to economic growth was perceived to be too ambitious and has not taken account of recent trends and data. The jobs figure (15,580) proposed in the Preferred Options was considered to be too high.

Spatial Strategy – Location of Development

The majority of representations were broadly in support of the Council's approach to focussing development around the town centre in brownfield locations. There were some objections to specific sites in these locations but these were more site-specific in nature than against the Council's strategy. There were a minority of objections from some parties on the grounds that the Council should pursue a strategy of accommodating more growth outside the Borough boundary, particularly towards the east of Ipswich. There were also objections raised from interested groups and private individuals on the broad location for future development after 2031 at Humber Doucy Lane which included concerns such as loss of high-grade agricultural land, traffic impacts and loss of biodiversity.

Housing

A broad scope of comments were received on a variety of housing matters. For example, the Home Builders Federation questioned the Council's approach to self-build plots, there were comments from the National Federation of Gypsy Liaison Groups regarding the Council's policy for Gypsy and Traveller accommodation, and concerns about the Council's stepped delivery approach to meeting its housing number.

Environment

There were detailed yet constructive comments from statutory consultees including the Environment Agency, Natural England and Anglian Water regarding environment related policies. Whilst none of these were opposed to the purpose of the proposed policies in the Preferred Options Local Plan, they recommended a wide range of amendments/ clarifications to certain policies. Some of these were formulated from more recent national Planning Practice Guidance and the revised National Planning Policy Framework (released after the Preferred Options Local Plan was formulated), for example the requirement to incorporate biodiversity net gain in new developments.

Heritage

Detailed comments from Historic England, Suffolk County Council and the Borough Council's own Urban Design and Conservation Team have been received regarding the Council's policies on the built environment and archaeology. Specific guidance to be incorporated in the site sheets has also been recommended.

Design

Suffolk Constabulary have recommended that additional measures regarding designing out crime and anti-terrorism measures are included throughout the document where appropriate.

Transport

Suffolk County Council had raised a general comment regarding the transport related policies (CS20, DM21 and DM22) which have resulted in follow up discussions between officers.

Site Allocations DPD

There were objections to certain sites that were proposed in the Preferred Options, such as IP129 (Woodbridge Road) which the Department for Education and Suffolk County Council requested be de-allocated for housing as this is intended to be a SEND school, as well as part of IP141(a) which the landowner wants to be allocated for an alternative use, not employment. There were also detailed objections to the majority of the sites at Ravenswood (IP150).

Comments were received from landowners on certain sites such as IP037 (Island Site) and IP064a (Land between Holywells Road and Holywells Park) which whilst supportive of the principle of residential-led allocations requested that opportunities to increase the levels of housing were made.

8. Conclusions

This report demonstrates that to date the Council has followed an open and transparent process in the preparation and publication of its emerging Local Plan 2018 to 2036. It has followed legislative requirements as well as good practice. It has also complied with its Statement of Community Involvement.

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

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

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

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

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B – Website


Ipswich Local Plan Review Preferred Options web page

On this page we provided comment forms with also a link to the [consultation module](#) site which allowed people to submit comments electronically during the consultation.


JDi Consultation module site

Site ref.	Site name and development description	Site size ha (% residential on mixed use sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S, M, L)
IP003	Waste tip and employment area north of Sir Alf Ramsey Way. Parts of the site are covered by facility retention policies of the Suffolk County Council Minerals and Waste Local Plan. Alternative sites will need to be agreed with the County Council and the site operators for the relocation of the Concrete Batching Plant and Household Waste Recycling Centre before the sites can be made available.	1.41 (90%)	114	90dph (DM22a lower end of range)	L
IP004	Bus depot, Sir Alf Ramsey Way. Allocated for mixed residential & B1	1.07 (c. 50%)	48	90dph (DM22a lower end of range)	L

Published on the Ipswich Borough Council website <https://www.ipswich.gov.uk/> 15th January 2019




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- Have your say on the future development of your town
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Have your say on the future development of your town



Published 15th January 2019

Ipswich people are being asked for their views on the Borough Council's draft Local Plan, a new document charting the development of the town over the next two decades.

The Local Plan is a blueprint covering future areas for housing, retail, business and leisure to meet the needs of a growing population.

All councils have to produce a Local Plan every five years and the latest one reviews and updates a series of proposals that have helped to guide the sustainable growth of Ipswich.

The Council is launching its draft Local Plan consultation exercise tomorrow (16th January) and this will run until 13th March and everyone who lives or works in the town, along with local businesses and organisations, can have their say.

Councillor Carole Jones, Planning & Development portfolio-holder, said: "Our Local Plan is a document about the town and how we can shape it over the coming years."

The draft plan, which takes Ipswich through to 2036, includes a proposed new Opportunity Area for mixed development in West End Road, new housing allocations in several sites and town centre plans made in tandem with shopfront design guidelines.

A change in Government calculations means that the required housing allocation for Ipswich until 2036 has fallen from nearly 10,000 to 8,622. This reduces reliance on neighbouring councils but that partnership will continue as there is a shortage of development land inside the Borough.

The draft plan also addresses the changing trends of people's shopping and leisure habits, completes key regeneration sites and strengthens communities in the town.

The draft Local Plan will adopted by the Council in early 2020 following submission to the Secretary of State.

Go online to www.ipswich.gov.uk/ipswichfuture and have your say. You have until 13th March to do so.

The Council is also taking its draft proposals to its Area Committees. The following are being held over the next fortnight:

South East: Wednesday 16th January, 7pm, Alan Road Methodist Church, Rosehill Road IP3 8EX

North West: Thursday 17th January, 7pm, St Raphael Club, Highfield Road IP1 4JP

North East: Thursday 24th January, 7.30pm, Ransomes Sports Pavilion, Sidegate Avenue IP4 4JJ




Public consultation meetings have also been arranged at the Town Hall on Saturday 26th January from 10am to 4pm and on Thursday 14th February between 10.am and 4pm and then between 5.30pm and 8pm.

For further comment:

Cllr Carole Jones, tel: 07824 430158

Cllr Ian Fisher, opposition Conservative Group Leader, tel: 07702 038029

Cllr Inga Lockington, opposition Liberal Democrat Group Leader, tel: 01473 213444

D – Social media

Twitter and Facebook

Ipswich Council @IpswichGov · Feb 13

Planners will be at the Town Hall tomorrow (14th Feb) between 10am-4pm and 5:30pm-8pm to talk to you about the Local Plan Preferred Options and how you can review its vision, objectives, policies and site allocations as part of the current consultation running until 13th March.



7

Ipswich Council @IpswichGov · Jan 9

Throughout January our Planners will be going to @areacommittees to talk to you about the #IBCLocalPlan & how you can review its vision, objectives, policies & site allocations. The consultation starts on 16 Jan. View meeting locations and times: bit.ly/20GfqYJ



1


Ipswich Borough Council · 9 January ·

Throughout January our Planners will be going to Area Committee meetings across Ipswich to talk to you about the Local Plan and how you can review its vision, objectives, policies and site allocations. The official consultation runs from 16 Jan to 13 March.

Area Committee schedule:

- 9 Jan - Central
- 10 Jan - South West
- 16 Jan - South East
- 17 Jan - North West
- 24 Jan - North East

Meeting locations and times can be found at <https://bit.ly/20GfqYJ>



2,707 People reached

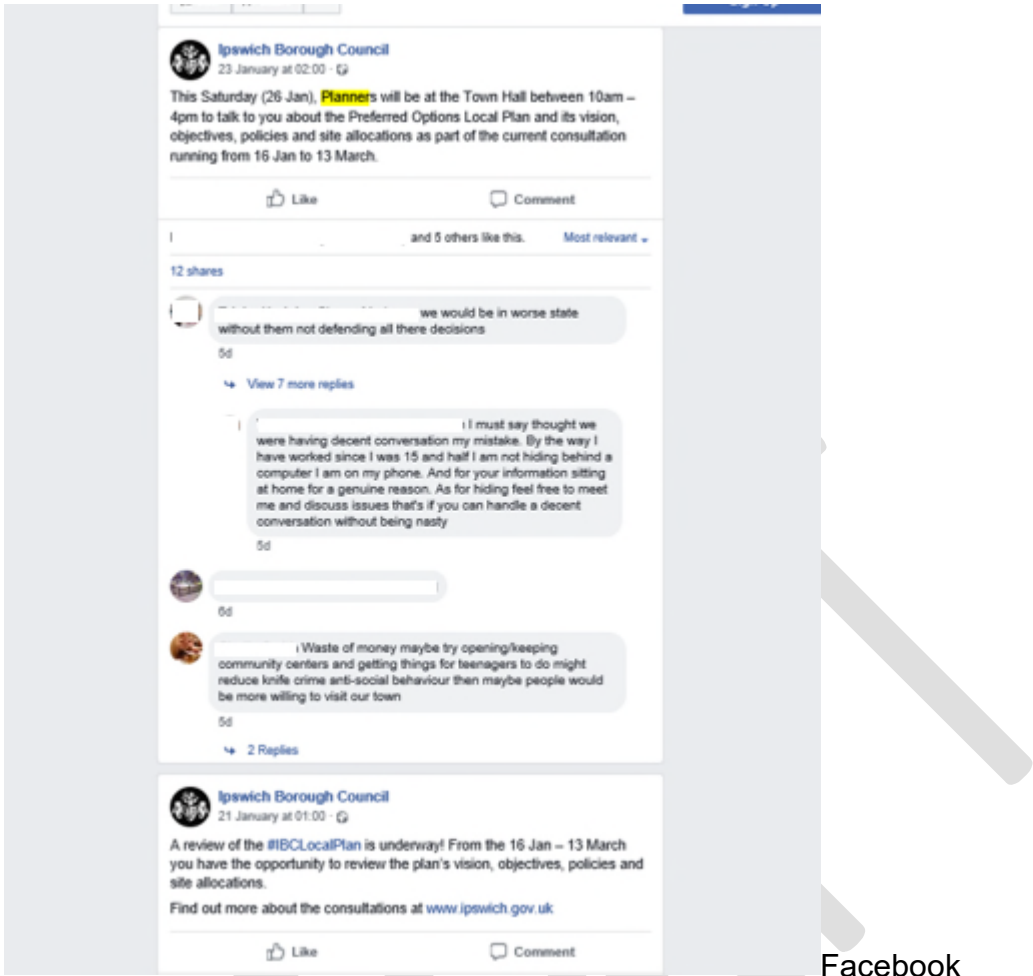
55 Engagements

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5

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Ipswich Borough Council 23 January · 🌐

This Saturday (26 Jan), Planners will be at the Town Hall between 10am – 4pm to talk to you about the Preferred Options Local Plan and its vision, objectives, policies and site allocations as part of the current consultation running from 16 Jan to 13 March.

5,258 People reached 547 Engagements [Boost Post](#)

👍👎 9 18 comments 12 shares

Ipswich Borough Council 13 February · 🌐

Planners will be at the Town Hall tomorrow (14th Feb) between 10am–4pm and 5:30pm–8pm to talk to you about the Local Plan Preferred Options and how you can review its vision, objectives, policies and site allocations as part of the current consultation running until 13th March.



3,867 People reached 187 Engagements [Boost Post](#)

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