

Ipswich Local Plan

Proposed Submission Core Strategy and Policies Development Plan Document Review

Statement of Consultation (Proposed Submission – Regulation 19)

September 2015



IPSWICH
BOROUGH COUNCIL

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1 Introduction

- 1.1 The Core Strategy and Policies development plan document review for Ipswich is a key development plan document forming part of the Ipswich Local Plan.
- 1.2 Before the Council submits the Core Strategy and Policies review to the Secretary of State, it has to comply with Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This requires a statement setting out:
 - (i) Which organisations and persons the local planning authority invited to make representations under regulation 18;
 - (ii) How they were invited to make their representations;
 - (iii) A summary of the main issues raised;
 - (iv) How those issues have been taken into account;
 - (v) If representations were made pursuant to regulation 20, the number made and a summary of the main issues raised;
 - (vi) If no representations were made pursuant to regulation 20 a statement of that fact.
- 1.3 The Pre-Submission Consultation Statement (November 2014) contains details covering points (i) to (iv) above. This Regulation 19 Consultation Statement addresses point (v) above in relation to consultation on the Proposed Submission Core Strategy and Policies development plan document review. Point (vi) is not relevant as representations were made.
- 1.4 The local plan system is built on a principle of 'front loading' in plan preparation, to involve stakeholders from the earliest stages. The National Planning Policy Framework (March 2012) states:

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.
- 1.5 The soundness of the Core Strategy and Policies development plan document review will be judged against whether it has been prepared in accordance with the Regulations and the Council's own Statement of Community Involvement, in relation to involving people.
- 1.6 The Council is committed to ensuring that the views of the community are taken into account as far as possible in the Local Plan. The Statement of Community Involvement for Ipswich was adopted in September 2007 and a subsequent review was adopted in March 2014 and sets out the approaches the Council will use to engage people in plan preparation.

2 Outline of the Core Strategy review preparation process in Ipswich

- 2.1 The Core Strategy and Policies development plan document was adopted in December 2011 after preparation of the document commenced in 2005. The Inspector's Report on the Examination into this document concluded that a review of the Core Strategy commence in 2012/13.
- 2.2 The Council's Local Development Scheme (July 2012) introduced the Core Strategy review and outlined a timetable for its preparation. The commencement of the Core

Strategy review was further announced in the Council's Local Plan newsletter 6 in February 2013 alongside a 'Call for Ideas' consultation in February and March 2013, in accordance with the Council's Statement of Community Involvement for Ipswich (September 2007). Subsequently, consultation on the draft Core Strategy review took place between January and March 2014. These consultations fall within Regulation 18 of the 2012 Regulations and are detailed in the Pre-Submission Consultation Statement (November 2014).

- 2.3 A revised Local Development Scheme was published in September 2014. The Proposed Submission Core Strategy review was approved by Council on 19th November 2014 and consultation took place between 12th December 2014 and 5th March 2015, under Regulation 19 of the 2012 Regulations.
- 2.4 A Statement of Community Involvement (SCI) for Ipswich review, which consolidated and improved the September 2007 version, was adopted in March 2014. The SCI sets out how the community will be involved in plan making. The Council must comply with the SCI in enabling involvement in all local development documents. A further Local Development Scheme was published in September 2014.

3 Proposed Submission Consultation (Regulation 19 under the 2012 Regulations)

- 3.1 The Proposed Submission consultation stage in Ipswich followed the consultation on the draft Core Strategy focused review consultation. A twelve week public consultation was undertaken between 12th December 2014 and 5th March 2015. Comments were invited by:

- Publishing consultation documents and comment forms for the Core Strategy and Policies review;
- Writing to all relevant specific and general consultation bodies;
- Writing to all people on the Council's Local Plan mailing list;
- Writing to those bodies prescribed by the duty to co-operate;
- Placing a public notice in the East Anglian Daily Times and Ipswich Star;
- Placing all relevant documentation on the Council's website, at its main offices, the Council's Customer Services Centre and in libraries;
- Holding ten drop in events at seven venues including the Town Hall at various dates and times including evenings and weekends;
- Attending five Area Committee meetings and giving a presentation; and
- Placing a planning feature in the Council's Newspaper, the Angle, delivered to households in Ipswich.

- 3.2 Attendances at the drop in events varied and is detailed below;

- **Town Hall, Pickwick Room:**
Tues 20th January (11am – 4 pm) 6 attendees
Wed 21st January (11am – 4 pm) 7 attendees
Friday 20th February (3 pm – 8 pm) 10 attendees
Saturday 21st February (11 am – 4 pm) 14 attendees
- **Ipswich Sports Club, Henley Road:**
Friday 23rd January (11 am – 4 pm) 16 attendees
Saturday 24th January (11 am – 4 pm) 18 attendees
- **The Meeting Place, Limerick Close:**
Wednesday 11th February (3pm – 8pm) 2 attendees
- **All Hallows Church Hall, Landseer Road:**
Thursday 12th February (3pm – 8 pm) 9 attendees

- **Colchester Road Baptist Church:**
Friday 13th February (3pm – 8 pm) 14 attendees
- **St Peter's Church, Stoke Park Drive:**
Tuesday 17th February (3 pm – 8 pm) 4 attendees

3.3 Representations on the proposed Submission Core Strategy and Policies development plan document review were received from a total of 1,090 individuals and organisations amounting to a total of 9,325 representations. Of these many were from residents completing proformas relating to the Ipswich Garden Suburb proposed allocation. A further 43 comments were made in relation to the Sustainability Appraisal and a further three comments were made in relation to the Habitats Regulations Assessment. Three comments were also made in relation to the Policies Map.

3.4 A summary of the representations is shown in Appendix 1. The main issues raised were:

- There was concern raised in respect of a lack of a date and agreement for accommodating growth outside the Borough to meet the objectively assessed housing needs for Ipswich, and the effectiveness of the duty to co-operate. The need for 13,550 dwellings was also questioned and whether infrastructure can be delivered to support the scale of housing growth proposed. It was also felt the focus should be on jobs growth rather than housing growth, although the jobs forecast was questioned with a concern it is too high.
- There was a suggestion for greater flexibility for alternative uses on Futura Park and other uses should also be considered within employment areas.
- It was felt conservation of the historic environment required more prominence including adding reference to historic parks and gardens, scheduled monuments, and addressing demolition of listed buildings and the setting of listed buildings.
- It was suggested the plan should promote a north-south axis for the central shopping area and the reduction in retail floorspace to 15,000 square metres in the central shopping area is not justified. It was felt the threshold for the requirement for impact assessments should be increased to 1,000 square metres from 200 square metres suggested in the plan. The shopping frontage policies were also considered too restrictive in the central shopping area, district and local centres.
- There were a large number of representations against the Ipswich Garden Suburb proposals, in particular concerns expressed over traffic and air quality and the water infrastructure capacity. The loss of greenfield land was raised together with the uncertain delivery of a country park. A suggestion was made that the extension to Orwell Country Park should be allocated in place of the country park at the Ipswich Garden Suburb. It was felt the priority should be on developing brownfield land and a target should be re-instated. The delivery of schools and the potential pressure on health services were other issues raised in respect of this proposal.
- There were differing views over the need and desirability of a northern bypass and the plan should be more ambitious on improving cycling and pedestrian infrastructure. Public transport requirements should also be more flexible and reflect modern lifestyles. There should be reference to a pedestrian bridge linking the Elton Park allocation with the sugar beet site.

- It was also felt there was too much detail in policy CS10 in respect of the Ipswich Garden Suburb and that the triggers for delivery of infrastructure were not justified. There was also objection to 35% affordable housing at the Ipswich Garden Suburb. It was suggested that an infrastructure delivery plan is needed and there should be clarity over what will be secured via the community infrastructure levy and what will be secured via section 106 agreements.
- There was concern over the purpose of the Green Rim and its potential to affect housing delivery. Policy DM34 on development in the open countryside was also considered too restrictive. Green corridors should also be more precisely drawn.

4 Conclusion

- 4.1 The Council has a significant objectively assessed housing need to accommodate where possible in Ipswich, which has necessitated some difficult decisions about how that need should be distributed and planned for. In addition it is necessary to ensure the Council has an appropriate job target to ensure economic growth in the Borough. In preparing the Core Strategy and Policies review, the Council has greatly valued the input received from all respondents.
- 4.2 The Council is committed to public involvement in the preparation of its Local Plan and has made efforts to ensure that people have been both informed of the key opportunities for involvement, and able to participate, for example by using a mixture of approaches and techniques. This Statement of Consultation, along with the Pre-Submission Statement of Consultation, has set out the key approaches used, who has been invited to take part, what response they have made and how the comments have been taken into account. In terms of liaison with key partners, formal consultation has supplemented ongoing liaison through the Duty to Co-operate, as outlined in the Duty to Co-operate Statement.
- 4.3 The Council considers that the approach taken has complied with Regulatory requirements and with the adopted SCI and its subsequent review.

Appendix 1 – Summary of Representations on Proposed Submission Core Strategy and Policies development plan document review (December 2014 – March 2015)

Proposed Submission Core Strategy and Policies Development Plan Document Review (without Proformas)

REP ID	RESPONDENT NAME	POLICY	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED
5567	Save Our Country Spaces (Mrs Barbara Robinson) [978]	1.2	SUPPORT	SOCS support extending the plan period from 2027 to 2031.	
5310	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	1.2	OBJECT	Paragraph 1.2 of the plan states that the purpose is to set out a strategy for the future development of Ipswich to 2031, the Plan only manages to show locations for 44.7% of the 10,585 additional homes over and above existing commitments needed between now and 2031.	The plan needs to be revised to form a joint core strategy, so that cross border growth is achieved.
5276	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	1.8	OBJECT	Paragraph 1.8 of the Plan states that the purpose is to set out the strategy for the future development of Ipswich to 2031. The principal concern is that the Plan fails to do this. The Plan only shows locations for 44.7% of the 10,585 additional homes over and above existing commitments needed between now and 2031.	The Plan needs significant revisions and needs to be republished in the form of a Joint Core Strategy so cross border growth is achieved to meet housing targets.
5643	Marine Management Organisation (Susan Davidson) [1004]	Chapter 2: The Planning System	OBJECT	Chapter 2 includes several references to the National Planning Policy Framework. It would be beneficial to also include reference to the Marine Policy Statement (MPS) and East Marine Plans. The East Inshore and East Offshore Marine Plans provide guidance for sustainable development in English waters, and cover the coast and seas from Flamborough Head to Felixstowe. The Marine Policy Statement will also guide the development of Marine Plans across the UK.	
5568	Save Our Country Spaces (Mrs Barbara Robinson) [978]	2.1	OBJECT	The manner of "last minute", poorly drafted "revisions" to the Executive paper on the 15th October [2013] on CS10 were unacceptable, and in breach of protocols and SCI. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the public interest. The revisions make a fundamental change in direction that has "seriously undesirable unintended consequences" which should be properly referenced, appraised and evaluated within the SA. The CS10 changes are not properly referenced nor track-changed within the SASR.	
5147	Private Individual	4.1	OBJECT	CS is unsound and should not be adopted. IBC has not demonstrated effective work with neighbouring Local Authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill. IBC should provide evidence that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council, else it will have failed in its duty to co-operate. It should explain in the CS how this strategic purchase aligns with the employment and housing growth strategies and targets.	Should provide necessary details as per comments above
5326	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.2	OBJECT	Until recently there has been little public evidence of around engaging and reaching agreement with neighbouring authorities on housing, economy and infrastructure despite the IPA Board. Ipswich was not involved in the commissioning of the 2012 Strategic Housing Market Assessment. Welcome the more recent increased frequency of meetings an transparency of the Board. There is no evidence of strategic policy outcomes from the IPA. There are no published joint topic papers. Individual jobs targets for Ipswich and neighbouring authorities are unrealistic when compared with the January 2015 East of England Forecasting Model forecasts.	IPA Board strategic outcomes should be incorporated within the Core Strategy.
5691	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.2	OBJECT	SOCS endorse NFPG points. Until recently there has been little public evidence of around engaging and reaching agreement with neighbouring authorities on housing, economy and infrastructure despite the IPA Board. Ipswich was not involved in the commissioning of the 2012 Strategic Housing Market Assessment. Welcome the more recent increased frequency of meetings an transparency of the Board. There is no evidence of strategic policy outcomes from the IPA. There are no published joint topic papers. Individual jobs targets for Ipswich and neighbouring authorities are unrealistic when compared with the January 2015 East of England Forecasting Model forecasts.	IPA Board strategic outcomes should be incorporated within the Core Strategy. Document does not comply with duty to cooperate

5537	Home Builders Federation Ltd (Mr James Stevens) [283]	4.4	OBJECT	Part B of the policy [CS2 - see separate representation] states that later in the plan period the Council will work with neighbouring authorities to address the housing need within the Ipswich housing market area (HMA). We consider that the plan is unsound because: a) it has not been positively prepared [to meet objectively assessed housing need]; b) it is unjustified - it does not represent the most appropriate strategy when considered against the reasonable alternatives; and c) it is ineffective because it is not based on effective joint working on cross-boundary strategic priorities.	
5363	Mersea Homes Limited (Mr Stuart Cock) [346]	4.4	OBJECT	The Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Table 3/CS7 further reinforces the degree to which the Council depends on adjoining authorities. The Council have not yet secured agreement to meet its housing need in adjoining authorities. It must therefore focus on demonstrating and justifying as part of this plan, what need it can meet, and identifying the infrastructure necessary to support that amount of development. CS2 should provide the overall narrative of this approach. [Also logged as CS2 objection]	
5265	Suffolk County Council (Mr Robert Feakes) [356]	4.4	SUPPORT	The County Council is committed to supporting the sustainable development of Ipswich. Through participation in the Ipswich Policy Area Board and on-going work to shape and implement the Local Plan, the County Council believes that, with the Borough Council, the requirements of the Duty to Cooperate have been met in respect of County Council functions.	
5325	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4	OBJECT	Until recently (2012/13) little effort has been made to constructively engage with neighbouring authorities. There is no recent evidence of effective and deliverable policies on strategic cross-boundary matters. The Core Strategy should not be examined until such work is released. The effectiveness of the Core Strategy would be greatly improved through cross-boundary joint initiatives and the public should have the opportunity to comment on these. Any intentions for development of the former sugar beet site (in Babergh District and recently purchased by Ipswich Borough Council) should be examined as part of the Core Strategy Review.	IPA Board strategic outcomes should be incorporated within the Core Strategy.
5555	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4	OBJECT	The Local Plan is not legally compliant and fails to comply with the duty to co-operate by failing to appropriately "identify significant cross boundary and inter-authority issues" and by failing to ensure that the plan rests on a credible evidence base. It also fails on duty to co-operate with adjacent local authorities, and with the Marine Management Organisation. If the plan cannot demonstrate effective joint working to meet cross-boundary strategic priorities, the public fear their quality of life, health and wellbeing will be at stake. The plan fails to demonstrate a positive approach to 'Localism'. Endorse NFPG points also.	SOCS claim the proposed Core Strategy is therefore unsound and as the Inspector is unable to modify the plan regarding Duty to Cooperate, it should be rejected.
5151	Parliament (Mr Ben Gummer) [1404]	4.4	OBJECT	IBC has not co-operated in any substantive way with its neighbouring authorities or with SCC. The relationship is profoundly dysfunctional. SCC's objections to the emerging IGS have not been accounted for in this document. The Ipswich Policy Area Board is a talking shop. The inspector should ask neighbour authorities and SCC about their experience of IBC's co-operation to gauge whether this policy and its accompanying appendix bears any relationship with reality.	The constrictions of the Borough boundary make it especially important for IBC to co-operate in a substantive way with neighbour authorities. The infrastructure requirements of the town require greater co-operation with SCC. IBC needs to demonstrate that it is actively co-operating, not just through the IPAB but also in decision-making on key sites.
5281	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	4.4	OBJECT	Paragraph 4.4 refers to the Duty to co-operate, it is evident from the failure of this plan to properly set out a long-term strategy to meet future development needs that the Council has not adequately engaged in co-operation with neighbouring authorities in advance of the preparation of this Plan.	The Core Strategy requires significant revisions in terms of the approach set out to meet housing need. The Core Strategy needs to be republished in the form of a Joint Core Strategy, so that cross-border growth that the plan itself acknowledges is required is properly dealt with.
5410	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	4.4	OBJECT	Duplicate of CS2 objection. We consider that the Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Reference to Table 3 indicates that the 'residual need later in the plan' represents around 40% of the overall plan housing requirement. The 'duty to cooperate' topic paper offers no substantive evidence that the Duty has been discharged. We are unconvinced that the Council can satisfactorily demonstrate that it has achieved the duty and for that reason we consider that the Plan is fatally flawed.	

5322	Crest Strategic Projects (Josephine Ritter) [1456]	4.4	OBJECT	IBC has an agreement with neighbouring councils to undertake further policy work which addresses growth needs of the IPA, including potential unmet housing need from IBC. CSP therefore consider that IBC has demonstrated that it has engaged with neighbouring authorities and has a strategy in place to address its housing land supply. However, IBC is seeking to: "... rely on windfall sites and will work with neighbouring local authorities to address housing need later in the plan period (CS7)." IBC should ensure that it continues proactively to explore options of accommodating housing overspill through the whole plan period.	
5153	Parliament (Mr Ben Gummer) [1404]	5.4	OBJECT	Deprivation in Ipswich also arises from poor education, poor transport links and poor planning decisions by the Borough Council.	These factors should be recognized in the plan.
5155	Parliament (Mr Ben Gummer) [1404]	5.7	OBJECT	The City Deal was agreed between a wider group of parties than simply Ipswich, including SCC, BDC, MSDC, SCDC and NALEP.	These parties should be recognized in the text.
5345	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	5.25	OBJECT	Paragraph 5.25 refers to the key challenges for Ipswich over the Plan period, but absent from the list of points raised is recognition of the fact the Plan is failing to deliver enough housing, because of constrained boundaries, an in this context needs to achieve the maximum delivery possible from existing suitable sites, before relying on assistance from neighbouring authorities.	Paragraph 5.25 should be revised to state that Ipswich will maximise growth within the Borough Boundary.
5644	Marine Management Organisation (Susan Davidson) [1004]	Chapter 6: Vision and Objectives	OBJECT	Chapter 6 - Within this chapter the waterfront is mentioned but not in relation to tourist facilities. The development and use of the waterfront as a marina is in-line with MPS. Within the MPS section 3.11 the importance of the sea in tourism and recreation is highlighted, and as a result can help link to marine planning.	
5202	Historic England (Mr Tom Gilbert-Wooldridge) [243]	6.7 The Vision	OBJECT	As stated in our response to the 2013 consultation, the vision makes little reference to the historic environment. Given that the NPPF requires local plans to set out a positive strategy for the conservation and enhancement of the historic environment (paragraph 126), the vision should contain explicit reference to how the Local Plan will address Ipswich's historic environment and heritage assets. Without such reference, we consider the Core Strategy is unsound as it is not consistent with national policy.	To make the Core Strategy sound, we recommend that an additional bullet point is included that states that the special historic and townscape character of Ipswich shall be protected and enhanced to reinforce the local distinctiveness and attractiveness of the town, building on the content contained in Chapter 5.
5403	Northern Fringe Protection Group (Mr Brian Samuel) [976]	6.7 The Vision	OBJECT	Support the vision but consider the strategy will not deliver it. The development of the Garden Suburb will result in severe congestion in north Ipswich and the town centre. Proposals to increase opportunities for buses, walking and cycling to the town centre are flawed as evidence challenges the viability of job creation in the town centre. Homes growth without jobs and sustainable transport will result in more commuting. This will harm prospects for investment. Updated traffic modelling and air quality modelling must be undertaken.	The Council should work with neighbouring authorities to encourage homes growth nearer to employment growth. All transport infrastructure required to achieve the target should be identified, or the targets amended.
5699	Save Our Country Spaces (Mrs Barbara Robinson) [978]	6.7 The Vision	OBJECT	SOCS endorse the NFPG's points. Support the vision but consider the strategy will not deliver it. The development of the Garden Suburb will result in severe congestion in north Ipswich and the town centre. Proposals to increase opportunities for buses, walking and cycling to the town centre are flawed as evidence challenges the viability of job creation in the town centre. Homes growth without jobs and sustainable transport will result in more commuting. This will harm prospects for investment. Updated traffic modelling and air quality modelling must be undertaken.	The Council should work with neighbouring authorities to encourage homes growth nearer to employment growth. All transport infrastructure required to achieve the target should be identified, or the targets amended.
5157	Parliament (Mr Ben Gummer) [1404]	6.7 The Vision	OBJECT	This vision contradicts the preceding statement in 6.3. The vision is anodyne and non-specific.	The document should show greater vision for the town within the context of the regional, national and global economy. Ipswich is in an exciting place - what the NALEP describes as the 'California of Europe'. The document should exhibit this vision and set the development of Ipswich within that context.
5449	Ipswich Central (Mr Paul Clement) [1423]	6.7 The Vision	OBJECT	The Vision should take account of the Greater Ipswich Partnership Vision for change to the central area.	
5158	Parliament (Mr Ben Gummer) [1404]	6.7 The Vision, f:	OBJECT	The Borough needs to explain how its recent purchase of the Sproughton Sugar Beet site, not in the Borough boundary but within the broader remit of this document, corresponds with their strategy for strategic employment sites.	The document needs to have a broader vision of strategic employment sites around the town.

5160	Parliament (Mr Ben Gummer) [1404]	6.7 The Vision, g:	OBJECT	The growth of the university should not be defined by the borders of the Education Quarter or new campus.	Include the whole Waterfront area and Island Site as possible locations for education purposes or spin-off businesses.
5203	Historic England (Mr Tom Gilbert-Wooldridge) [243]	6.8 The Objectives	SUPPORT	We welcome the amendments to the objectives following our response to the 2013 consultation, and the more holistic reference to the historic environment in Objective 8.	
5766	Tuddenham St Martin Parish Council (Mrs C Frost) [1394]	6.8 The Objectives	OBJECT	Objectives seem muddled, sometimes in conflict, sometimes not measured and sometimes only aspirations.	
5450	Ipswich Central (Mr Paul Clement) [1423]	6.8 The Objectives	OBJECT	The document talks of a strategy to "enhance[e] the town centre in terms of quantity and quality of the shops..." (P12), but it does not explain how and by when.	
5152	Private Individual	6.8 The Objectives, 3:	OBJECT	Without properly defined specific and measurable jobs growth objectives the CS is unsound. To improve clarity and effectiveness 2 jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators should be specified.	Take account of above comments
5156	Private Individual	6.8 The Objectives, 3:	OBJECT	The housing target Objective 3(a) is so poorly defined as to be ineffective and as such the CS is unsound. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and progress measured.	To take account of the above
5396	Northern Fringe Protection Group (Mr Brian Samuel) [976]	6.8 The Objectives, 3:	OBJECT	ONS migration data used by the Council only extends to 2010/11, the latest ONS forecast shows no net migration from 2012-2031 for Ipswich. DCLG's February 2015 household projections suggest a need for 10,434 new homes. The baseline household figure used is too high. The Viability Report indicates 28% affordable housing for the Garden Suburb, the affordable housing target should not compromise delivery of other infrastructure. It is not clear whether the jobs target relates to Ipswich or the Ipswich Policy Area. How will jobs growth be measured? A higher population has been used to estimate jobs growth than population growth.	The housing target should be revised to reflect the latest DCLG household projections, it should be specific, realistic and measurable. The term 'provide' should be clarified, there should be an explanation of how the Council intends to develop housing in the neighbouring local authority areas. There should be clarification on the intentions for the former Sugar Beet Factory site. The target for affordable homes at the Garden Suburb should be set at a level which will not compromise infrastructure provision. A detailed Ipswich Garden Suburb Infrastructure Delivery Plan should be in place prior to development commencing. There should be properly defined and measurable targets for jobs growth. The Ipswich Housing Market Area should be defined in the glossary.
5584	Save Our Country Spaces (Mrs Barbara Robinson) [978]	6.8 The Objectives, 3:	OBJECT	Are 13,500 homes needed, are they desirable, and are they deliverable? SOCS do not support this figure as justified or necessary. SOCS believe the 12,500 jobs target is unrealistic and undeliverable. There has been no real jobs growth since 2001 and public sector jobs are set to reduce. This is unsustainable and not compliant with the NPPF. Endorse NFFPG points also.	
5616	Ashfield Land Limited (Mr Paul Derry) [1122]	6.8 The Objectives, 3:	SUPPORT	Objective 3 of the adopted Core Strategy requires that 18,000 additional jobs are to be provided in the Ipswich Policy Area between 2001 and 2025 (draft policy CS13 of the draft Core Strategy and Policies Development Plan Document) encourages the provision of in the region of 12,500 jobs between 2011 and 2031). In accordance with this objective, it is estimated that the Ipswich Business Park has the capacity to generate up to 2,000 new jobs within the B1, B2 and B8 Business use classes.	
5163	Parliament (Mr Ben Gummer) [1404]	6.8 The Objectives, 3:	OBJECT	This level of housing allocation cannot be supported without new infrastructure, little of which is identified in this document. The affordable housing target for the IGS is unrealistic and is not the current target being discussed with developers, so should be omitted as misleading.	The housing target should be linked to appropriate new infrastructure. The affordable housing target for the IGS should represent the reality of discussions with developers and agreed bounds of viability.
24200	Private Individual	6.8 The Objectives, 3:	OBJECT	There is no need for 13,500 homes and this number is not desirable (Objective 3a). Where will 12,500 jobs come from (Objective 3b)?	
5288	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	6.8 The Objectives, 3:	OBJECT	Objective 3 states that at least 13,550 new homes are to be provided within the Ipswich Housing Market Area, but the plan do not achieve that Objective.	The Core Strategy should identify either sites or broad locations to meet the full housing requirement, which in practice means identifying additional location on the edge of town or elsewhere in neighbouring areas through a proper joint Core Strategy

5542	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	6.8 The Objectives, 3:	OBJECT	We consider that the objective of securing at 35% affordable housing within the Ipswich Garden Suburb is unsound since it is neither justified by the evidence presented by the Council in its evidence base, neither is it effective since this provision is demonstrably not capable of being achieved under prevailing conditions of viability. A full representation is submitted against Policy CS12.	Objective 3 (under paragraph 6.8) should be amended to require 15% affordable housing provision within the Ipswich Garden Suburb, subject to viability testing. This would be consistent with the objective as it applies to the remainder of the Borough area.
5714	Private Individual	6.8 The Objectives, 3:	OBJECT	The housing target Objective 3(a) is so poorly defined as to be ineffective and as such the CS is unsound. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and progress measured.	
5802	Private Individual	6.8 The Objectives, 3:	OBJECT	Do not understand how 12500 jobs will be created	
5811	Private Individual	6.8 The Objectives, 3:	OBJECT	Do not understand how 12500 jobs will be created.	
5343	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	6.8 The Objectives, 4:	OBJECT	Objective 4 sets out the principal locations for growth. Whilst we do not object to the proposed locations, the Plan is failing to deliver enough land for housing, and in that context, needs to achieve the maximum delivery possible from existing suitable sites within the borough boundary. Objective 4 should therefore recognise the potential for additional growth locations.	It is considered that in order to properly reflect the importance of delivery from all suitable housing sites in the Borough boundary, Objective 4 should be amended as follows: "The development of the Borough should be focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb, and within and adjacent to identified district centres, and at the other growth locations (these areas are identified on the key diagram)."
5721	Save Our Country Spaces (Mrs Barbara Robinson) [978]	6.8 The Objectives, 6:	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The CS relies heavily on a transport modal shift from cars to more sustainable modes such as walking, cycling and public transport. This will be challenging and it is suggested that an additional indicator of the Census travel mode to work data be included to improve soundness.	Add an additional indicator of the Census travel mode to work data be included to improve soundness.
5720	Save Our Country Spaces (Mrs Barbara Robinson) [978]	6.8 The Objectives, 10:	OBJECT	SOCS endorse the Northern Fringe Protection group's points. The target is very unambitious. Low income is a key factor in deprivation but is not included as an indicator. The Core Strategy needs to be more effective in tackling this issue.	Include average wages and the rank of Ipswich in the Indices of Multiple Deprivation as indicators. More ambitious and specific time related targets for continuously improving the latter should be used.
5722	Save Our Country Spaces (Mrs Barbara Robinson) [978]	6.8 The Objectives, 12:	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The proposed indicator is vague and gives no measure of beneficial outcomes from working together on jobs growth, housing growth or strategic infrastructure.	Indicators should include joint topic papers, work programmes and definable outcomes relating to jobs growth, housing growth and strategic infrastructure. The target should be more specific but as a minimum should be 'to achieve effective cross boundary working on housing growth, jobs creation and strategic cross boundary infrastructure including green space.'
5311	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	6.14	OBJECT	Paragraph 6.14 seeks to justify why new housing development is necessary in Flood zone 3, and does this on the basis that there is insufficient suitable land elsewhere for meeting housing need, as presently drafted, the Core Strategy is not maximising the use of suitable housing land within the Borough outside Flood zone 3, paragraph 6.14 requires amendment to cross refer to the fact the such additional opportunities have been maximised in advance of additional housing within flood zone 3.	Paragraph 6.14 requires amendment to cross refer to the fact the such additional opportunities have been maximised in advance of additional housing within flood zone 3.
5543	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	6.17	OBJECT	The Spatial Strategy under Section 6.9 of the Plan fails to give adequate emphasis to the Ipswich Garden Suburb as a key element of the spatial strategy for Ipswich. We do not consider that this provides for effective plan-making. Section 6.9 is heavily weighted in favour of the town centre and waterfront. IGS is referenced in a single sentence only (6.17), but is the single largest source of new homes (including family homes) proposed. IGS, which is essential to Ipswich's growth and prosperity, must be given prominence in the spatial strategy so Borough-wide infrastructure and investment decisions can be made.	Section 6.9 should provide greater emphasis to the Ipswich Garden Suburb, explaining how it functions as part of the spatial strategy and how it relates, in infrastructure, economic development and social terms, with other elements of the strategy.

5165	Parliament (Mr Ben Gummer) [1404]	6.18	OBJECT	<p>The extension of the central retail area is opposed by Ipswich Central, which represents town centre retailers. They propose contracting the central retail area to take account of changed shopping habits and concentrate the shopping district in a smaller area, running from the Waterfront to Christchurch Park. This document directly contradicts their plan, which also has the support of SCC.</p> <p>Moreover, IBC should declare its financial interest in seeking to extend the central shopping area, as it would involve land owned by IBC.</p>	This document should follow the aspirations of Ipswich Central, supported by SCC, for the central retail area.
5333	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	7.2	OBJECT	<p>Our concerns in regard to the green rim are that the designation has no clear purpose or evidence base to support it, the plan is failing to meet objectively assessed housing need, and failing to make use of appropriate development opportunities within the Borough boundary, the designation of a green rim is premature, and prejudicial to the proper long-term planning of the area.</p>	Reference to the green rim should be removed from paragraph 7.2 as designation of a green rim is premature in advance of the proper long term strategy for accommodating new homes required in the Ipswich Area.
5421	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	Diagram 3 - The Ipswich Key Diagram	OBJECT	<p>Whilst we recognise that the green corridors shown in the Key Diagram are illustrative, the graphic style used to illustrate them provides a misleading indication of their width and positioning. A revised narrower graphic style should be used to illustrate the general alignment and geography of the corridors. CBRE SPUK II (No.45) Ltd control land west of Westerfield Road which is intercepted by the corridor which runs due north away from the town centre. The corridor illustratively occupies some one third of the site area. There is no clarity provided under Policy CS16 to define its character, dimensions or alignment.</p>	A revised narrower graphic style should be used to illustrate the general alignment and geography of the corridors.
5341	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Diagram 3 - The Ipswich Key Diagram	OBJECT	<p>The Plan is failing to deliver enough land for housing, and in that context, needs to achieve the maximum delivery possible from existing suitable sites within the borough boundary. The Key Diagram should identify additional suitable sites (including my client's land at north-east Ipswich). In addition, it is inappropriate for the Key Diagram to show a green rim around the edge of Ipswich, in advance of the formulation of long-term strategy for accommodating the number of new homes needed in the Plan period.</p>	<p>Removal of the 'green rim' from the Key Diagram;</p> <p>Addition of a new growth location for housing at north-east Ipswich (land off Humber Doucy Lane and land adjacent to Westerfield House Farm off Tuddenham Road).</p>
5277	Suffolk County Council (Mr Robert Feakes) [356]	Chapter 8: Development of the Strategy	SUPPORT	<p>Suffolk Health and Wellbeing Strategy includes four strategic objectives:</p> <ul style="list-style-type: none"> Every child has the best start in life; Residents have access to a healthy environment; Older people have a good quality of life; People have the opportunity to improve their mental health. <p>CS15 considers the educational needs of children. Other policies promote safe and sustainable travel and protect public open space and play facilities. Ipswich's population is ageing, though less quickly than the rest of Suffolk. Higher housing accessibility requirements are not needed currently, but may be considered through any further Local Plan review. Mental health is supported through policy DM5d.</p>	
5771	Private Individual	CS1: Sustainable Development - Climate Change	SUPPORT	<p>The plan will protect our health or deal with air pollution. National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will deliver sustainable development.</p>	
5539	Home Builders Federation Ltd (Mr James Stevens) [283]	CS1: Sustainable Development - Climate Change	OBJECT	<p>Parts of the policy are unsound as they are contrary to national policy.</p>	Policy should be deleted
5361	Mersea Homes Limited (Mr Stuart Cock) [346]	CS1: Sustainable Development - Climate Change	OBJECT	<p>The obligations to secure 15% energy provisions from decentralised sources or to achieve 'significant' reductions in carbon emissions are not justified nor is it consistent with national policy. The obligations should be deleted.</p>	The obligation to secure 15% of energy provision from decentralised sources and to achieve 'significant' reductions in carbon emissions should be deleted.
5556	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS1: Sustainable Development - Climate Change	OBJECT	<p>SOCS major concern relates to non compliance of CS1 with the NPPF. Traffic problems, congestion & gridlock fail NPPF requirements for no "serious adverse effects". Air Pollution, increased human mortality and Public Health risks from traffic are identified in 2000 as a serious and growing problem in Ipswich which mitigation measures appear not to have alleviated. IBC hasn't the capacity to control likely serious adverse impacts via DM Policies on Transport, Traffic congestion, Air Pollution, Flood Risk, Potable Water and Sewage Requirements. There is insufficient work on likely Climatic Change impacts and Cumulative Impacts with Suffolk Coastal District growth plans.</p>	

24069	Private Individual	CS1: Sustainable Development - Climate Change	OBJECT	The plans will protect our health and deal with pollution. The plan can achieve sustainable development. It is not known whether the removal of trees, hedgerows, habitats and farmland is acceptable and whether the Country Park will be delivered in a timely manner. It is not known whether the plan will improve matters relating to infrastructure and services drainage, flooding and sewage.	
5633	Private Individual	CS1: Sustainable Development - Climate Change	OBJECT	We already have significant and chronic issues relating to infrastructure and surface drainage, flooding and sewerage. The proposals will only add to these and not improve matters. Heavy rainfall and flash flooding are an increasing feature of our weather patterns and this will not improve matters. CS1 CS17 & CS20	
5622	Private Individual	CS1: Sustainable Development - Climate Change	OBJECT	Will your plans protect our health and deal with pollution?	
5487	Private Individual	CS1: Sustainable Development - Climate Change	OBJECT	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development. There are some changes which will increase the area of road for traffic to queue on, but they do not fundamentally address the problem of traffic movement.	
5355	Gladman Developments (Mr Russell Spencer) [1437]	CS1: Sustainable Development - Climate Change	OBJECT	Pursuing sustainable development requires careful attention to be paid to viability and costs in plan-making, and should assess the likely cumulative impacts (my emphasis) on development of such policies and standards so that the viability of the plan itself is not compromised through making the proposed scale of development unviable. The Inspector needs to be satisfied that this is indeed the case.	
5408	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS1: Sustainable Development - Climate Change	OBJECT	The model policy setting out the NPPF presumption in favour of development should not be conflated to the remainder of Policy CS1 and should instead be a separate policy. The obligation to secure 'significantly reduced carbon emissions' is not costed, is not justified nor is it consistent with national policy. The obligation should be deleted. The obligation to secure 15% energy provisions from decentralised sources is not justified nor is it consistent with national policy. The obligation should be deleted.	The model policy in relation to the NPPF presumption in favour of development should form a separate policy. The obligation to secure 'significantly reduced carbon emissions' should be deleted. The obligation to secure 15% of energy provision from decentralised sources should be deleted.
5801	Private Individual	CS1: Sustainable Development - Climate Change	OBJECT	Air pollution, Infrastructure issues, the plans for the Country Park are not acceptable, sustainable development will not be achieved through CS1.	
5807	Private Individual	CS1: Sustainable Development - Climate Change	OBJECT	Air pollution, Infrastructure issues. The Country Park Plans are unacceptable, CS1 is does not achieve sustainable development.	
5816	Private Individual	CS1: Sustainable Development - Climate Change	OBJECT	Question whether the plan will protect our health or deal with air pollution.	
5404	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS1/8.21	OBJECT	The Core Strategy fails to take sufficient account of the waste water issues arising from proposed expansion of Ipswich. The Draft Strategic Economic Plan identified the scale and cost of new connections as inhibiting development of some strategic sites. The Water Cycle Study shows that significant upgrading is required to wastewater treatment capacity. The pipeline from north Ipswich to Cliff Quay is at capacity and no viable solutions for the Garden Suburb have been proposed. This could seriously undermine the delivery of the Core Strategy.	The Core Strategy should include a proper assessment of the cumulative needs for strategic wastewater infrastructure related to jobs and homes growth. These should be incorporated in the infrastructure tables (8a and 8b). The growth figures may need to be revised accordingly.
5700	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS1/8.21	OBJECT	SOCS endorse the NFPG's points. The Core Strategy fails to take sufficient account of the waste water issues arising from proposed expansion of Ipswich. The Draft Strategic Economic Plan identified the scale and cost of new connections as inhibiting development of some strategic sites. The Water Cycle Study shows that significant upgrading is required to wastewater treatment capacity. The pipeline from north Ipswich to Cliff Quay is at capacity and no viable solutions for the Garden Suburb have been proposed. This could seriously undermine the delivery of the Core Strategy.	The Core Strategy should include a proper assessment of the cumulative needs for strategic wastewater infrastructure related to jobs and homes growth. These should be incorporated in the infrastructure tables (8a and 8b). The growth figures may need to be revised accordingly.
5166	Parliament (Mr Ben Gummer) [1404]	CS1/8.25	OBJECT	The document does not describe an objective for the renewal and new planting of street trees.	The document should have an explicit policy on street trees.
5164	Private Individual	CS2: The Location and Nature of Development	OBJECT	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land	To take account of above comments

5204	Historic England (Mr Tom Gilbert-Wooldrige) [243]	CS2: The Location and Nature of Development	OBJECT	<p>We generally support the principle of concentrating development in the town centre and adjoining areas, but only where it does not compromise heritage assets and the distinctive character of Ipswich. We still have some concerns regarding the use of high densities within the town centre, Ipswich Village and Waterfront, but welcome the additional wording regarding heritage assets and the historic character of Ipswich at the end of the policy.</p> <p>The supporting text offers some helpful recognition of the design and conservation issues relating to the location of development</p>	
5536	Home Builders Federation Ltd (Mr James Stevens) [283]	CS2: The Location and Nature of Development	OBJECT	<p>We consider that the Ipswich plan is unsound on three counts</p> <p>a) it has not been positively prepared - i.e. that the plan is based on a strategy which will meet the objectively assessed housing need including any unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p> <p>b) it is unjustified - it does not represent the most appropriate strategy when considered against the reasonable alternatives; and</p> <p>c) it is ineffective because it is not based on effective joint working on cross-boundary strategic priorities.</p>	
5362	Mersea Homes Limited (Mr Stuart Cock) [346]	CS2: The Location and Nature of Development	OBJECT	<p>The Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Table 3 (CS7) further reinforces the degree to which the Council depends on adjoining authorities. The Council have not yet secured agreement to meet its housing need in adjoining authorities. It must therefore focus on demonstrating and justifying as part of this plan, what need it can meet, and identifying the infrastructure necessary to support that amount of development. CS2 should provide the overall narrative of this approach. [Logged also to para4.4]</p>	
5872	Private Individual	CS2: The Location and Nature of Development	OBJECT	<p>The vacant units in the town centre should be converted into town houses and flats</p>	
5388	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS2: The Location and Nature of Development	OBJECT	<p>An alternative of co-operating more closely with other authorities to find a more sustainable location than the Northern Fringe, which is remote from new employment sites and not connected by sustainable transport, could have been identified. These are reasons why housing needs are unable to be met in the Borough, under the terms of the National Planning policy Framework. Support the strategy of urban renaissance in central Ipswich but concerned that multi-site development of the Garden Suburb will have a detrimental impact on this. The removal of the 60% target for development on brownfield land is a negative step.</p>	<p>Ipswich Borough Council should co-operate more closely with other local authorities to plan for locating new homes nearer to identified employment growth sites and produce sustainable solutions in accordance with the National Planning Policy Framework. A target should be retained for the use of previously developed land, accepting this will be lower than the adopted Core Strategy and could be reduced over time.</p>
5617	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS2: The Location and Nature of Development	OBJECT	<p>For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site. [SOCS endorse Northern Fringe Protection Group points also].</p>	<p>A target should be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.</p>
5763	Tuddenham St Martin Parish Council (Mrs C Frost) [1394]	CS2: The Location and Nature of Development	OBJECT	<p>The plan seems to be oblivious to risk:</p> <ol style="list-style-type: none"> 1. consciously opting to develop flood plains, 2. dismissing the consequences of no clear strategy for East West traffic (particularly around the wet dock area), 3. dismissing the A14 and northern Ipswich traffic issues as out of its scope, 4. inward-looking focus regarding traffic infrastructure for Ipswich Garden Village, ignoring areas outside the Borough boundary. <p>The Parish Council have deep concerns about the viability and sustainability of the plan, particularly the impact of failings on Tuddenham St Martin residents and environment, and the presumption being made about areas in neighbouring authorities.</p>	
5356	Gladman Developments (Mr Russell Spencer) [1437]	CS2: The Location and Nature of Development	OBJECT	<p>Deferring decisions around addressing housing need within the wider Ipswich housing market area to a later date is clearly not in line with the requirements of the Framework or PPG.</p>	
5316	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	CS2: The Location and Nature of Development	OBJECT	<p>Policy CS2 sets out the principal locations for growth, the plan is failing to deliver enough land for housing and needs to achieve the maximum delivery possible from existing suitable sites within the Borough boundary. Part B of the policy refers vaguely to the potential for additional growth locations later in the Plan period, this approach is unsound.</p>	<p>Part b of the policy deleted and wording amended to include reference to "other locations shown as being suitable for housing growth on the key diagram"</p>

5409	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS2: The Location and Nature of Development	OBJECT	We consider that the Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Reference to Table 3 indicates that the 'residual need later in the plan' represents around 40% of the overall plan housing requirement. The 'duty to cooperate' topic paper published by the Council offers no substantive evidence that the Duty has been discharged. We are unconvinced that the Council can satisfactorily demonstrate that it has achieved the duty and for that reason we consider that the Plan is fatally flawed.	
5377	Applekirk Properties Ltd (Teresa Cook) [1452]	CS2: The Location and Nature of Development	OBJECT	Applekirk Properties Ltd objects to policy CS2 as it cannot be considered to have been positively prepared and it is not justified as the strategy will not provide the future capacity for comparison and convenience retail floorspace identified in the evidence base. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed. We consider that policy CS2 fails to do this. Sites are available in the Waterfront/Merchants Quarter which would accommodate an element of the retail capacity identified for Ipswich and support its regeneration.	CS2 should be amended to allow for major retail development within the town centre to address the identified comparison and convenience retail capacity within Ipswich to 2026 and 2031. Alternatively, the Central Shopping Area boundary should be extended to include the main routes through the Merchant's Quarter at Star Lane and College Street.
24214	EDF Energy Plc (Miss Nicola Forster) [248]	CS2: The Location and Nature of Development	OBJECT	There should be a preference for development on brownfield land. There should be some flexibility with density standards. In certain situations outside of the town centre it may be possible to achieve higher densities and each site should be assessed on a site specific basis.	The policy should be amended to include a preference for development on previously developed land and include flexibility for densities.
5193	Environment Agency (Lizzie Griffiths) [1021]	CS2: The Location and Nature of Development, g:	OBJECT	Support but require changes. We support this approach of dispersing green open space through the town and providing an ecological network of green corridors. When incorporated into developments, these areas can have other functions, such providing space for SuDS features, which help to both reduce flood risk and protect water quality. We consider it would be beneficial to include these benefits within the text of this policy.	
5161	Private Individual	CS2/8.28	OBJECT	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land	To take accounts of comments above.
5405	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS2/8.28	OBJECT	Support the strategy of urban renaissance in Ipswich and note the first bullet point 'it will maximise opportunities to re-use previously developed land within central Ipswich.' The proposed removal of the 60% target for development on brownfield land is a negative step. With the multi-site development of the Garden Suburb concerned that developers will focus on greenfield development. This will have a detrimental impact on the regeneration of brownfield sites particularly in the town centre and deprived areas.	A target for use of brownfield land should be retained, accepting that this may be lower than the current target. This could be reduced over time.
5589	Private Individual	CS2/8.28	OBJECT	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.	A target should be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.
5661	Private Individual	CS2/8.28	OBJECT	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.	A target should be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.
5704	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS2/8.28	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Support the strategy of urban renaissance in Ipswich and note the first bullet point 'it will maximise opportunities to re-use previously developed land within central Ipswich.' The proposed removal of the 60% target for development on brownfield land is a negative step. With the multi-site development of the Garden Suburb concerned that developers will focus on greenfield development. This will have a detrimental impact on the regeneration of brownfield sites particularly in the town centre and deprived areas.	A target for use of brownfield land should be retained, accepting that this may be lower than the current target. This could be reduced over time.
5314	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	CS2/8.31	OBJECT	Paragraph 8.31 notes that beyond 2024, opportunities for development in the Borough boundary become more limited, and there will be a need to consider ways of meeting housing need outside the Borough boundary, it is incumbent on the Council to make best use of land within its own boundary before it relies this has not been done.	Paragraph 8.31 should be revised to make clear that additional suitable opportunities within the Borough boundary will be used first.

5221	Associated British Ports [209]	CS3: IP-One Area Action Plan	OBJECT	ABP requests that recognition is made in Policy CS3 and its accompanying text to the Port of Ipswich and to other important existing employment and other activities within and adjoining the IP-One area which the Council wishes to safeguard and support. 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>Add new criterion:</p> <p>New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p>
5205	Historic England (Mr Tom Gilbert-Wooldridge) [243]	CS3: IP-One Area Action Plan	SUPPORT	The IP-One Area contains the greatest concentration of heritage assets within the town (both designated and non-designated) and is a location that requires both conservation and change. We welcome the amendments to part (e) of Policy CS3 that requires the AAP to have policies that identify heritage assets which development proposals will need to have regard to. We note part (c) which provides a strong policy link to the Opportunity Areas contained within the AAP. It will be important that these opportunity areas contain adequate development principles relating to the historic environment (see separate representations).	
5451	Ipswich Central (Mr Paul Clement) [1423]	CS3: IP-One Area Action Plan	OBJECT	We support the relocation of the two bus stations to a single site (most probably to the Cox Lane/Tacket Street area, in our view), thereby allowing for extension of the Tower Ramparts/Sailmakers centre.	
5590	Ipswich Conservative Group [1814]	CS3: IP-One Area Action Plan	OBJECT	The Conservative Group supports the principle of developing and regenerating the town centre to boost employment in the town. It is important that Ipswich is developed as a successful shopping centre.	
5283	Suffolk County Council (Mr Robert Feakes) [356]	CS4/8.42	OBJECT	Paragraph 8.42 [CS4] could better describe the significance of the AAI. 'An Area of Archaeological Importance for remains of all periods in the historic core, particularly Anglo Saxon deposits.'	Paragraph 8.42 could better describe the significance of the AAI. 'An Area of Archaeological Importance for remains of all periods in the historic core, particularly Anglo Saxon deposits.'
5194	Environment Agency (Lizzie Griffiths) [1021]	CS4/8.45	OBJECT	Support but require changes. We support this reference to the legislation and policy protecting natural assets. However, we consider that the Water Framework Directive should be included in list, as an important piece of legislation for the protection of waterbodies, which can have an indirect impact on EU Habitats Directive and Ramsar sites.	
5195	Environment Agency (Lizzie Griffiths) [1021]	CS4/8.50	OBJECT	Support but require changes. We support the inclusion of this paragraph, which discusses the importance of ecological networks in conserving important habitats and helping to provide resilience to pressures such as climate change. We are pleased to note that the Council recognises its biodiversity responsibility under the Natural Environment and Rural Communities Act 2006 and recommend that the Council's responsibilities under the Water Framework Directive are also recognised in this section.	
5406	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS4/8.52	OBJECT	Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	A firm delivery date for the Country Park should be specified, or it should be delivered on a sequential basis as the Garden Suburb is developed.
5705	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS4/8.52	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	A firm delivery date for the Country Park should be specified, or it should be delivered on a sequential basis as the Garden Suburb is developed.
5207	Historic England (Mr Tom Gilbert-Wooldridge) [243]	CS4: Protecting our Assets	OBJECT	<p>Policy CS4 does not meet the NPPF requirement for a positive strategy to the historic environment or constitute a strategic policy approach. There is a need for a more explicit strategic policy approach.</p> <p>The supporting paragraphs also need amendments.</p>	<p>In order to achieve soundness, the third sentence of Policy CS4 should avoid merely delegating to the development management policies and should set out a strategic approach similar to what is set out for biodiversity. It could read as follows:</p> <p>"The Council will conserve and enhance heritage assets within the Borough in a manner appropriate to their significance. This will include the use of planning obligations to secure the enhancement of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance, and steps to reduce the number of heritage assets "at risk" and improve historic shopfronts and public realm.</p>

5645	Marine Management Organisation (Susan Davidson) [1004]	CS4: Protecting our Assets	OBJECT	Policy CS4 - this policy would benefit from making reference to the East Offshore and East Inshore Marine Plans, specifically policy MPA1. Within this policy RAMSAR and SPA sites do cross into the South East marine plan area.	
24071	Private Individual	CS4: Protecting our Assets	OBJECT	It is not known whether the removal of trees, hedgerows, habitats and farmland is acceptable or whether the plan will deliver the Country Park in a timely manner.	
5411	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS4: Protecting our Assets	OBJECT	Paragraph 113 of the NPPF requires [policy] to be criteria-led, but Policy CS4 is not. We also consider that the balancing measures set out in paragraph 118 of the NPPF should be reflected in the Policy. We consider that the last paragraph of the Policy should form part of Policy CS1.	Policy CS4 should be reworded to reflect the requirements of paragraphs 113 and 118 of the NPPF. We consider that the last paragraph of the Policy should form part of Policy CS1.
5137	The Ipswich Society (Michael Cook) [245]	CS5/8.63	OBJECT	Support but require changes. The Ipswich Society supports these admirable objectives. However, the Borough is frustrated in achieving its laudable aims because it does not have full ownership of the governance and financing of travel plans. The Policy must, therefore be more explicit and firmer in delineating our aims.	
5557	Westerfield Parish Council (Mr Peter Miller) [235]	CS5: Improving Accessibility	OBJECT	The Ipswich Garden Suburb is located in an area which is away from the areas of main employment and the town centre. It is unlikely many of the residents of the proposed 3,500 houses will walk or cycle to work, and direct transport connections will only be to the town centre. So, although the need to travel will be minimised through the existence of local services on site, as far as employment accessibility is concerned, we doubt whether this aspiration will be met.	Good accessibility may not be achievable for the Ipswich Garden Suburb because of its location. It is not near any of the major employment locations. This will lead to a significant increase in traffic in this area and measures will need to be put in place to mitigate this situation. Further transport assessment is also needed to enable residents to use public transport from the Ipswich Garden Suburb to employment locations other than the town centre to minimise the need to travel by car. Housing locations should take this into account and as such the council needs to reconsider the number of houses planned for the Northern Fringe and place some nearer the employment centres where possible
5267	Suffolk County Council (Mr Robert Feakes) [356]	CS5: Improving Accessibility	SUPPORT	Notwithstanding the current gaps in the transport evidence base, the Core Strategy and Policies Document's approach to transport policy appears to be largely sound. Policy CS5 supports a strategic approach to delivering sustainable transport and is welcomed.	
5604	Private Individual	CS5: Improving Accessibility	OBJECT	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. On Henley Road there are queues at every junction and lorries thundering past. Congestion is far worse than it ever was.	
5634	Private Individual	CS5: Improving Accessibility	OBJECT	The transport issues and proposals ref. CS5, CS17 and CS20 are not adequately dealt with and will result in many years of gridlock and adverse impact for both residents and businesses alike in the north of Ipswich. This will have knock-on impact elsewhere in the town as drivers seek to avoid pinch points. The plan will not remedy or provide sufficient mitigation against this.	
5623	Private Individual	CS5: Improving Accessibility	OBJECT	There are transport issues and the traffic proposals policies CS5, CS17 and CS20 do not address these.	
5488	Private Individual	CS5: Improving Accessibility	OBJECT	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development.	
5754	Private Individual	CS5: Improving Accessibility	OBJECT	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Fails to address traffic flow in the north of Ipswich	
5798	Private Individual	CS5: Improving Accessibility	OBJECT	Transport issues and traffic proposals - the plan is not justified or effective.	
5805	Private Individual	CS5: Improving Accessibility	OBJECT	Transport issues and traffic proposals - the plan is not justified or effective.	
5138	The Ipswich Society (Michael Cook) [245]	CS6/8.69	OBJECT	Support but require changes. We fully support the Ipswich Policy Area and insist that it becomes more active in supporting policies that effect the greater economic area and putting forward factual support for cross boundary developments and for infrastructure improvements. Frequent reports now instituted, must contain firm planning proposals	

5425	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS6/8.70	OBJECT	There is no public evidence on of any strategic policy outcomes from the IPA. There are no joint Topic Papers on housing growth, jobs growth and strategic infrastructure. Evidence base documents referred to in 8.70 have not been made available which is in breach of the Development Plan Document process. The Core Strategy should better ensure effective co-operation between Ipswich Borough Council and neighbouring authorities.
5707	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS6/8.70	OBJECT	SOCS endorse the Northern Fringe Protection Group's comments on 8.70 [CS6]. There is no public evidence on of any strategic policy outcomes from the IPA. There are no joint Topic Papers on housing growth, jobs growth and strategic infrastructure. Evidence base documents referred to in 8.70 have not been made available which is in breach of the Development Plan Document process. The Core Strategy should better ensure effective co-operation between Ipswich Borough Council and neighbouring authorities.
5545	Home Builders Federation Ltd (Mr James Stevens) [283]	CS6: The Ipswich Policy Area	OBJECT	The plan is unsound because it is not based upon constructive cooperation that will address the unmet need of the HMA.
5364	Mersea Homes Limited (Mr Stuart Cock) [346]	CS6: The Ipswich Policy Area	OBJECT	We do not consider that the Borough has adequately demonstrated that it has met the Duty to Cooperate. The requirements of the Duty, as explained by the NPPF and Planning Practice Guidance, are for key issues to be considered and addressed during plan-making, and for clear outcomes to be reflected in policy. The Council must focus on identifying its full objectively assessed need, and justifying the extent to which it can meet a proportion of that need. Policy CS6 should provide the basis for it to secure agreement with adjoining authorities in the longer term.
5765	Tuddenham St Martin Parish Council (Mrs C Frost) [1394]	CS6: The Ipswich Policy Area	OBJECT	Policies written in general terms are selectively chosen, particularly for example with regard to relying on the scope of the Ipswich Policy Area. At times the scope of the plan covers the whole Ipswich Policy Area but at others times it does not. The Parish Council have concerns about the impact of the plan on Tuddenham St Martin, and the presumption being made in relation to areas in neighbouring authorities.
5441	Ipswich Central (Mr Paul Clement) [1423]	CS6: The Ipswich Policy Area	SUPPORT	Ipswich Policy Area (P39) - we would be pleased to represent town centre businesses on the Ipswich Policy Board
5275	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	CS6: The Ipswich Policy Area	OBJECT	Duty to co-operate is not met as the Plan fails to properly set out a long term strategy to meet future development needs, the Council has not adequately engaged in co-operation with neighbouring authorities in advance of the preparation of the Plan. The Plan should identify either sites or broad location to meet the full housing requirement, which in practice involves identifying sites in neighbouring areas. There is a recognition that the Council has not met the requirement under toe NPPF to identify sufficient sites, and that the Council and its neighbouring authorities so need to work together to achieve a robust strategy and there is an admission that the work that is needed hasn't been done yet.
5412	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS6: The Ipswich Policy Area	OBJECT	We do not consider that the Borough has adequately demonstrated that it has met the Duty to Cooperate. The requirements of the Duty, as explained by the NPPF and Planning Practice Guidance, are for key issues to be considered and addressed during plan-making, and for clear outcomes to be reflected in policy. There is limited evidence to demonstrate that this has happened. There is, however, clear evidence to demonstrate that key issues have been deferred, and that Policies provide only an interim policy position pending further discussions. Neither situation demonstrates that the Duty to Cooperate has been met.
5139	The Ipswich Society (Michael Cook) [245]	CS7/8.76	OBJECT	Support but require changes. It is good to see that the majority of the housing new builds will take place on Previously Developed Land , apart from the Ipswich Garden Suburb. It is disturbing that 4051 of the 10,585 needed by 2031 have no identified site. It would be helpful to add in the figures from Ipswich Travel To Work Area to shed light on the contribution from the other authorities in the IPA to our housing problem.

5337	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	CS7/8.76	OBJECT	The objection is that there is recognition that the Council has not met the requirement under the NPPF to identify wither specific sites in years 1-10 or broad locations for years 11-15. There is recognition from the Council that the Plan does not meet the objectively assessed housing need. There is recognition the the Council and neighbouring authorities need to work together to achieve a robust strategy, there is recognition that this work has not been done yet.	The Plan should be revised to form a joint core strategy, the Plan needs to be prepared in tandem with the preparation of Development Plans for the neighbouring areas.
5313	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	CS7/8.79	OBJECT	There is a recognition that the Council has not met the requirement under the NPPF to identify sufficient specific sites for the 1-10 years or broad locations for 11-15 years therefore does not meet the objectively assessed needs for housing. There is also a recognition that the Council and neighbouring authorities need to work together and there is an admission that the work that is needed hasn't been done yet.	The Core Strategy needs to be revised to form a joint core strategy, so that cross border growth can occur
5546	Home Builders Federation Ltd (Mr James Stevens) [283]	CS7: The Amount of Housing Required	OBJECT	Policy CS7: The amount of new housing required The policy is unsound because: a) it is questionable whether the figure of 13,550 (as set out in paragraph 8.77) is properly representative of the objectively assessed housing need for Ipswich	
5365	Mersea Homes Limited (Mr Stuart Cock) [346]	CS7: The Amount of Housing Required	OBJECT	Policy CS7 relies upon evidence which is not up to date. In order to be certain that the full objectively assessed housing need has been identified, further updates to evidence are required. Notwithstanding the issue of evidence, Policy CS7 does not provide an adequate or sound basis for meeting housing need, since it is reliant on unidentified sources of housing land, including those outside the Ipswich Borough administrative area, to meet that need. The Council should focus on identifying the proportion of its full objectively assessed need that it can meet, and plan effectively to deliver that.	Policy CS7 must be reviewed in light of up-to-date evidence to demonstrate that an objectively assessed housing need has been identified in the Plan. Policy CS7 must also resolve, in combination with Policy CS6, how and where housing need is to be met within the Borough.
5266	Suffolk County Council (Mr Robert Feakes) [356]	CS7: The Amount of Housing Required	OBJECT	Currently the Highway Authority does not have sufficient evidence to judge whether or not the residual cumulative impacts of the development proposed will be severe. This needs to be provided by IBC. The County Council will continue to advise IBC on commissioning further evidence to consider this matter. Modelling undertaken for the adopted Core Strategy suggested that the overall effects of development could be mitigated if sufficient sustainable transport measures were delivered. This model is being updated. It is likely that the planned growth will have significant localised impacts on the highway network, necessitating sustainable transport measures and highway mitigation.	
5694	Private Individual	CS7: The Amount of Housing Required	OBJECT	You state that house prices in Ipswich are below the national average. Surely by the laws of supply and demand this would imply there is an excess rather than shortfall of housing. You only have to compare prices here with those in nearby locations with a genuine shortfall (for example Cambridge) to see this in practical effect. So the large-scale increase in housing stock that the strategy calls for is unjustified.	
5399	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS7: The Amount of Housing Required	OBJECT	Support the efforts of the Council in using existing models and forecasts. However, the data is not up to date. ONS migration data used only goes up to 2010/11 whereas latest forecasts show no migration to Ipswich from 2012-2031. Immigration will take place in places with better jobs and wages. DCLG's household projections show a need for 10,434 homes. The baseline household figure used is too high.	The latest ONS population forecasts and DCLG's February 2015 household projections should be used when calculating the housing target.
5573	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS7: The Amount of Housing Required	OBJECT	Object to the requirement for 13,500 homes. It requires a big increase on current building levels and those since 2008. SOCS do not support this figure as justified or necessary. IBC appear to be "letting the tail wag the dog." Threats from unsustainable development via the lack of 5 year supply, should not force the Borough into proposing an inadequate plan. The plan must have balance and be both job and homes led. Growth should not be a "given" if the circumstances are adverse and dictate otherwise. Localism (public views) should be given greater weighting. Endorse NFPG points also.	
5636	Private Individual	CS7: The Amount of Housing Required	OBJECT	Are 13,500 new homes really required, are they truly needed let alone desirable ? - CS7	

5762	Tuddenham St Martin Parish Council (Mrs C Frost) [1394]	CS7: The Amount of Housing Required	OBJECT	The muddled presentation of the housing requirement in the opening of the document set the tone for the rest of the report. The scope sometimes includes the whole Ipswich Policy Area (IPA), e.g. available locations for all 13000+ homes, and sometimes does not, e.g. road access to the north of Ipswich. Housing requirements: of 13,550 for the period 2011-2031, 10,585 new sites are needed. 4,734 are identified within Ipswich Borough, including the IGS, with a further 1,800 properties to be built on 'windfall' sites. This leaves 4051 to be built within the IPA, but outside Ipswich Borough.	
5318	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	CS7: The Amount of Housing Required	OBJECT	The Plan is failing to deliver enough land for housing, and needs to achieve the maximum delivery possible from existing suitable sites within the Borough boundary.	Policy CS7 should recognise the potential for additional growth locations
5413	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS7: The Amount of Housing Required	OBJECT	Policy CS7 relies upon evidence which is not up to date. In order to be certain that the full objectively assessed housing need has been identified, further updates to evidence are required. This includes 2011 Census data and DCLG 2012-based household projections as a starting point. Notwithstanding the issue of evidence, Policy CS7 does not provides an adequate or sound basis for meeting housing need, since it is reliant on unidentified sources of housing land, including those outside the Ipswich Borough administrative area, to meet that need. It is therefore contrary to NPPF paragraph 47.	Policy CS7 must be reviewed in light of up-to-date evidence to demonstrate that an objectively assessed housing need has been identified in the Plan. Policy CS7 must also resolve, in combination with Policy CS6, how and where housing need is to be met.
5320	Crest Strategic Projects (Josephine Ritter) [1456]	CS7: The Amount of Housing Required	OBJECT	We consider the overall Local Plan housing target contained within the Proposed Submission Core Strategy to be justified and positively prepared, and accordingly consistent with National Policy. IBC concludes that it has only 3.9 years' worth of supply (4,253 dwellings) based upon its adopted Core Strategy housing requirement (AMR December 2014). However, The PPG advises that the shortfall should be rectified within the first five years, which results in 3.26 years' of supply. This therefore places increased emphasis on the deliverability of the identified locations for growth, including the Garden Suburb.	
5821	Private Individual	CS7: The Amount of Housing Required	OBJECT	Question the requirement for 13,500 homes - they are not needed and this number is not desirable. It requires a big increase on current building levels and those since 2008.	
5547	Home Builders Federation Ltd (Mr James Stevens) [283]	Table 3 - Estimated Housing Delivery for 2014-2031 Excluding Current Permissions as at 1st April 2014	OBJECT	The Council expects a total of 1,800 dwellings to materialise in the form of windfall development over the plan period with 90% of these being on brownfield land (see also paragraph 48 of the Housing Topic Paper). This is a quite a substantial figure and it would be helpful if the Council provided some evidence to justify its assumption	
5346	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Table 3 - Estimated Housing Delivery for 2014-2031 Excluding Current Permissions as at 1st April 2014	OBJECT	Based upon the sources of supply set out in Table 3, policy CS7 states that 5,434 new homes will be allocated for development through the Site Allocations Plan, the Plan is failing to deliver enough land for housing, and needs to achieve the maximum delivery possible from the existing suitable sites within the Borough boundary.	Table should recognise the potential for additional growth locations (Humber Doucy Lane) END OF DELETION To demonstrate no reasonable prospect of re-use for employment purposes (B1, B2 or B8), applicants will be required to produce evidence that the site has been marketed actively for a continuous period of at least six months from the date of the first advertisement for business (B1) general industrial (B2) or storage and distribution (B8) uses as appropriate to the site. More detail also needs to be shown on how drainage will be managed. There should be a trigger in the infrastructure requirements for the Supplementary Planning Document to show the strategic SUDs solution. Westerfield Parish Council want assurances that if the Garden Suburb surface water is drained through the Westerfield water course, then there will be no increase in flood risk in this area.

The Core Strategy should identify the funding required, when it is needed and how it will be secured, and should include measures to improve the retail offer.

There should be an explanation of how the acquisition of the Sugar Beet Factory site fits with the Core Strategy.

The Council needs to show how obstacles to growth identified in the Viability Study can be overcome.

The forecast growth of retail, business services and professional services jobs needs to be reviewed.

Paragraph 8.46 should be amended to set out the Council's local and strategic approach to listed buildings (not just relying on national legislation and policy). The second sentence of Paragraph 8.53 should be deleted. The second sentence of Paragraph 8.55 should read "Whilst registration offers no additional statutory protection, they are designated heritage assets of considerable significance and an important material consideration in development management"

As a minor change to ensure accuracy with the NPPF, the first sentence of Policy CS4 should be amended to read "heritage" rather than "historical", as heritage assets is a nationally defined policy term.

In locations outside of the Area of Archaeological Importance, archaeological assessment will also be required prior to determination of any proposal which may disturb below-ground remains. Investigation may be required prior to determination, if justified by evidence.

Planning permission will not be granted if remains identified are of sufficient importance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.

Where there is no overriding case for remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted subject to an appropriate programme of archaeological investigation and recording being undertaken prior to the commencement of development. An appropriate programme of work could comprise some or all of further evaluation, upfront excavation and/or monitoring and control of contractor's groundworks.

To amend accordingly.

5189	Parliament (Mr Ben Gummer) [1404]	CS8/8.85	OBJECT	Although the needs of an ageing population are identified in this section, there are no specific policies about the provision of sheltered or very sheltered accommodation close the the town centre to enable continued living for older people and people with restricted mobility all without access to cars.
5140	The Ipswich Society (Michael Cook) [245]	CS8/8.89	OBJECT	Support but require changes. Unarguably, the biggest need is for small starter homes; however, it is vital to recognise that to increase the overall affluence of the town, its employment attractiveness and economic activity, this section must ensure that there is sufficient "executive" style housing.
5141	The Ipswich Society (Michael Cook) [245]	CS8/8.95	OBJECT	Support but require changes. The Society would like to see the Policy lay down a proportion or number of in Self Build, Custom Build and Co-Housing developments in proposals of, say, 50 or more units.
5640	Private Individual	CS8: Housing Type and Tenure	OBJECT	Too many flats are going up all over the area. What is needed is more community space for families and other community groups
5357	Gladman Developments (Mr Russell Spencer) [1437]	CS8: Housing Type and Tenure	OBJECT	New 2012-based Sub-National Household Projections have been published, and it is these that should form the starting point for any comprehensive assessment of objectively assessed housing need, as per PPG2.

5414	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS8: Housing Type and Tenure	OBJECT	Policy CS8 does not provide an effective basis for decision-making since the exceptions allowed undermine the control which is intended to be exercised under the Policy. It should be deleted. CS8 requires a mix of dwelling types to be delivered in accordance with the SHMA (itself now a dated document), then recognises that exceptions will be necessary to reflect the site's location and characteristics. A further exception criterion allows a scheme to better reflect local housing need (which should be identified through the SHMA). The final exception criterion provides more flexibility allowing an overall housing numbers situation to override considerations.	Policy CS8 does not provide an effective basis for decision-making since the exceptions allowed undermine the control which is intended to be exercised under the Policy. The Policy should be deleted.
5655	Private Individual	CS8: Housing Type and Tenure	OBJECT	Attractive larger homes are needed as well as those proposed on the original plans for the northern fringe.	
5426	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS9/8.99	OBJECT	The NPPF encourages the re-use of previously developed land. The proposed removal of the 60% target for brownfield land development is a negative step. With multi-site development at the Northern Fringe, concerned that developers will focus on greenfield rather than brownfield. This will have a detrimental impact on the regeneration of brownfield sites.	A target should be retained for the re-use of previously developed land.
5708	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS9/8.99	OBJECT	SOCS endorse the Northern Fringe Protection Group's points on 8.99 [CS9]. The NPPF encourages the re-use of previously developed land. The proposed removal of the 60% target for brownfield land development is a negative step. With multi-site development at the Northern Fringe, concerned that developers will focus on greenfield rather than brownfield. This will have a detrimental impact on the regeneration of brownfield sites.	A target should be retained for the re-use of previously developed land.
24215	EDF Energy Plc (Miss Nicola Forster) [248]	CS9: Previously Developed Land	SUPPORT	Support this policy approach and agree with the priority of building on previously developed land.	
5558	Westerfield Parish Council (Mr Peter Miller) [235]	CS9: Previously Developed Land	SUPPORT	Policy CS9 Previously Developed land Westerfield Parish Council supports the policy of focussing on previously developed (brownfield) land first.	
5142	The Ipswich Society (Michael Cook) [245]	CS9: Previously Developed Land	OBJECT	Support but require changes. We believe that the target percentage should stated in this statement; we suggest 35% in the period 2014 to 2031.	
5696	Private Individual	CS9: Previously Developed Land	OBJECT	the development of the garden suburb is questionable. The council should revisit assumptions and models. It is probable that development of brownfield sites would be sufficient for a more realistic (and modest) growth in demand.	
5478	Private Individual	CS9: Previously Developed Land	OBJECT	The core strategy seeks to address to need to accommodate 13,500 houses with the northern fringe development known as the 'Ipswich Garden Suburb' accounting for 3,500 houses. The principle of brown field first has now been dropped as I understand, this is rather short sighted. Brown field developments are normally more sustainable in all respects. It would appear that the desire on behalf of developers, to maximise profit is the key driver for the demise of brown field first.	
5389	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS9: Previously Developed Land	OBJECT	The proposed removal of the 60% target for development on brownfield land is a negative step.	A target should be retained for the use of previously developed land accepting that it will be lower than the current Core Strategy. This could be reduced over time.
5692	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS9: Previously Developed Land	OBJECT	SOCS endorse Northern Fringe Protection Group points. The proposed removal of the 60% target for development on brownfield land is a negative step.	A target should be retained for the use of previously developed land accepting that it will be lower than the current Core Strategy. This could be reduced over time.
5476	Private Individual	CS9: Previously Developed Land	OBJECT	The core strategy seeks to address to need to accommodate 13,500 houses with the northern fringe development known as the 'Ipswich Garden Suburb' accounting for 3,500 houses. The principle of brown field first has now been dropped as I understand, this is rather short sighted. Brown field developments are normally more sustainable in all respects. It would appear that the desire on behalf of developers, to maximise profit is the key driver for the demise of brown field first.	

5415	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS9: Previously Developed Land	OBJECT	Policy CS9 does not provide an effective policy in the context of the Borough's constrained housing land supply and should be deleted. Table 3 demonstrates an overall deficiency of supply. Land within the town centre and Garden Suburb is proposed to be allocated for development. There is limited other land which could be allocated. The practical function of Policy CS9 and the degree to which it can be effective is therefore unclear. CS9 cannot have any material impact upon housing delivery, since the proportion of previously developed land which can be brought forward is a function of the supply available.	Policy CS9 should be deleted.
5575	Ipswich Conservative Group [1814]	CS9: Previously Developed Land	OBJECT	The importance of Brownfield sites is not emphasised enough in the Development Plan. In an urban environment like Ipswich, it is clearly important that maximum use should be made of brownfield sites as a means of meeting housing needs. Brownfield development should be prioritised.	To ensure that brownfield land is developed and to preserve agricultural land, the target for brownfield development should be reinstated.
5427	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS10/8.102	OBJECT	Selectively referencing paragraph 47 of the NPPF gives the impression that the Council has no option but to comply. Paragraph 15 of the NPPF states 'as far as is consistent with the policies set out in the framework'. One such policy is 'sustainability'.	Paragraph 8.102 should be reworded to include 'as far as is consistent with the policies set out in the framework.'
5168	Parliament (Mr Ben Gummer) [1404]	CS10/8.104	OBJECT	There are still significant areas of derelict and/or underutilised land in the town centre which need to be better recognized in this document.	A better plan for derelict and underutilised land in the town centre.
5170	Parliament (Mr Ben Gummer) [1404]	CS10/8.105	OBJECT	The scale of housing indicated in this document is unsustainable without significant new road, cycle and pedestrian infrastructure.	The document needs to include plans for new infrastructure.
5124	Private Individual	CS10/8.106	OBJECT	Whilst I accept that this development will happen the current thinking is wholly wrong. It seems to assume that everybody will work in town, will travel by bus or cycle which is total nonsense and the infrastructure for a development of this size is not available.	The most important change is to first build a northern bypass or at least have direct access to the main A14/A12 roads
5171	Parliament (Mr Ben Gummer) [1404]	CS10/8.108	OBJECT	No new roads other than those actually in the new development are indicated in the SPD.	This paragraph needs to be corrected.
5227	Private Individual	CS10/8.108	OBJECT	With regard to road infrastructure this is totally unsound. Only additional traffic in the immediate vicinity of the Garden Suburb has been considered. Strong representations in the earlier consultation re the effect on traffic congestion in other parts of Ipswich have been ignored. Specifically access from the Garden Suburb to the A14/A12 and the town's main employment and out-of-town shopping areas will require traffic to transit the Norwich Road, Valley Road, Chevallier Street, and Yarmouth Road junctions which are already over-congested and a designated AQMA.	A northern link road direct from the Garden Suburb to the A14 at Whitehouse is essential and should be a pre-requisite to any development of the Garden Suburb.
5125	Private Individual	CS10/8.109	OBJECT	The very reason the planning application was refused is lack of infrastructure. This does not appear to have changed.	It is total madness to build traffic chaos into any development. Every time there is any traffic problem on the A12 between Copdock and Seven Hills the traffic is diverted through the town. Adding 3500 new homes to the existing roads coupled with the ridiculous schemes currently being done will make driving totally impossible.
5172	Parliament (Mr Ben Gummer) [1404]	CS10/8.109	OBJECT	Subsequent traffic modelling by the applicants and by SCC invalidate the previous assumptions upon which the Secretary of State made his previous judgement.	IBC should not depend on the judgement of the appeal for their lack of new infrastructure to support this new development and need radically to reassess their SPD.
5150	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	It is unsound to allocate the entire Ipswich Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The Council's population forecast should not be based on a high immigration scenario, which is inconsistent with the policies of all main political parties.	Change re comments above
5159	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The CS cannot guarantee the delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat, namely the Stour and Orwell Estuary Special Protection Area. For soundness policy CS10 and Infrastructure Table 8B need to be revised. The Country Park and green areas need to be established before building starts as it takes a long time for such habitats to mature. If this doesn't happen then there will be no 'Garden' part of the promised 'Garden Suburb' for at least 20 years.	To take accounts of the above comments

5560	Westerfield Parish Council (Mr Peter Miller) [235]	CS10: Ipswich Garden Suburb	OBJECT	Policy CS10 Ipswich Garden Suburb Westerfield Parish Council is concerned over the effect the development will have on the rural character of Westerfield Road. However, Westerfield Parish Council is supportive of steps taken to maintain Westerfield's independence, by ensuring any development has an appropriate physical separation from the village. This council also supports the provision of a country park in the proposed location.	In addition to the green buffer proposed for Westerfield, the policy should request that steps are taken to minimise the impact the development will have on the rural nature of Westerfield Road.
5143	The Ipswich Society (Michael Cook) [245]	CS10: Ipswich Garden Suburb	OBJECT	Support but require changes. The Society has always accepted the necessity in due course of the development of these green fields for residential use. It is mandatory that the developers understand the land uses as set out and the requirement for infrastructure and multi-modal transport provision before consideration is given to any application. Additionally, there should be a paragraph reiterating the parameters of good and sustainable design; we must insist on an exceptional architectural statement on this site.	
5742	Private Individual	CS10: Ipswich Garden Suburb	SUPPORT	I welcome the fact that there will be a small country park built into the design of the Northern Fringe development.	
5369	Mersea Homes Limited (Mr Stuart Cock) [346]	CS10: Ipswich Garden Suburb	OBJECT	Support the allocation of the Ipswich Garden Suburb as a key element of the spatial strategy. However CS10 is not effective since it establishes inflexible and overly detailed policy requirements. The land use budget, land use annotations set out on the Proposals Map, and the details set out in Table 8B should be deleted. The IGS is supported by a draft SPD which provides a more flexible means of co-ordinating long term development. However, we have concerns that viability has not been fully reflected in the guidance. Including SPD detail in policy reduces flexibility to deal with changing circumstances.	The land use budget, land use annotations set out on the Proposals Map, and the details set out in Table 8B should be deleted. Policy CS10 should provide a broad policy framework which allows additional detail to be brought forward as guidance in support of policy. This is exactly the process which is no underway, and it is necessary for strategic policy to avoid detail if this is to be effective.
5278	Suffolk County Council (Mr Robert Feakes) [356]	CS10: Ipswich Garden Suburb	OBJECT	The County Council has no comment regarding the soundness of this policy, which appears to deliver the vision set out in the adopted masterplan. As set out elsewhere in the [County Council's] response, the County Council sees proper infrastructure mitigation as being the key issue for delivery of the Northern Fringe/Garden Suburb. CS10 requires that the Garden Suburb establishes a new library service on site. This is in line with the County Council's strategy for library provision.	
5642	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Objection to traffic generated by the garden suburb development.	
5641	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Traffic issues around the garden suburb proposal, by pass required prior to development	
5576	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Concerned over the loss of land for food production. It is presumed that traffic impacts have been carefully examined. Concern over potential traffic safety impacts for pedestrians on Henley Road railway bridge. Will this be a pretty garden suburb or a severely car congested small town? Delivery of the whole Garden Suburb may not be viable over the timescale of the Plan. The Plan should be based on close co-operation with neighbouring authorities. Population forecasts should not be based on high immigration. Delivery of the Country Park in a timely manner cannot be guaranteed.	
5698	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The garden suburb proposals do not sufficiently consider the additional infrastructure requirements that a large development of this type would demand. Traffic is the obvious issue " the suburb would necessitate a Northern bypass to accommodate the huge rise in vehicular traffic. Other considerations would be health, schools, pollution and waste-water.	
5664	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Concerned that traffic impacts have not been considered. Concerned that increases in usage on Colchester Road, Valley Road, Tuddenham Road and Westerfield Road will worsen congestion. People will not use cycles or public transport. More thought should be given to improving road links. concerned that there are no plans to improve hospitals or GP facilities. Concerned that schools will be expected to cope with additional pupils without any new schools or improvements. Concerned that the development is being hurried through, often rather secretly, without consideration of existing residents.	

5479	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The economic activity driving the demand for the Ipswich Garden suburb, is absent at the present time with absence of any statement of interest by organisations and businesses wishing to local with sustainable commute distance. Who will buy the houses? It is likely that Ipswich Garden suburb will become a commute enclave, contributing many additional vehicle movements.	
5390	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS10: Ipswich Garden Suburb	OBJECT	Traffic from the Garden Suburb will have a severe adverse impact across the whole of north Ipswich and the town centre. Assumptions that use will be made of public transport, cycling and walking are not realistic due to the location of employment sites. Welcome the recent work commissioned by Suffolk County Council around solutions for the road network around North Ipswich. There has been no traffic assessment of the effects of multiple starts. The foul water pipeline from north Ipswich to the treatment works is at capacity. There is no mechanism to ensure timely delivery of the Country Park.	Sewage requirements should be included in the infrastructure table. The entire northern fringe should not be allocated as delivery may not be viable over the plan period. A mechanism for timely delivery of the Country Park needs to be determined. Further traffic modelling should be undertaken which looks at the effects of multiple starts to show that the Garden Suburb development will not result in severe traffic and air quality impacts. The Council needs to provide evidence on how it intends to make roads safer for cycling.
5581	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS10: Ipswich Garden Suburb	OBJECT	How will infrastructure be provided for 3,500 dwellings at IGS plus 10,000 homes elsewhere? Will the Country Park be delivered in a timely/successful fashion? The Multi-start approach is not sustainable and may cause environmental damage, loss of quality of life, the imposition of high urban densities, and loss of soil, biodiversity, heritage, trees and ancient hedgerows, and prime food growing farmland. It is unacceptable. Multi-starts may infringe Human Rights (case law re. freedom from noise pollution in Copenhagen). Need a moratorium from growth pressures so IBC can address long term issues, e.g. resourcing major road infrastructure. Endorse NFFPG points also.	
24072	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	It is not known whether the removal of trees, hedgerows, habitats and farmland is acceptable and whether the plan will deliver the Country Park in a timely manner.	
5635	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The delay in the provision of the Country Park with a multi-start development of housing does not inspire confidence that the park will be delivered and be pushed to the side with further delays. Removal of trees, hedgerows, habitats and farmland without immediate replacement by the country park is not an acceptable proposal - the development of the Country Park should be at the very early stages of the Plan. CS1.4 & CS10	
5632	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Object to the garden suburb on the grounds of loss of countryside, traffic generation and impact on wildlife.	
5627	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	There are numerous "Brown Field" sites in Ipswich and these have acres of land that are eminently suited to housing development without the need to take away prime agricultural land that is needed to feed the growing population of the United Kingdom The traffic that will be generated by these additional homes will overwhelm the road network in the immediate vicinity of the proposed development. (They struggle to cope with the current volume of vehicles). The proposal of tinkering with a couple of road junctions will not solve the problem. Major road works are needed to accommodate residents vehicles.	
5626	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	With specific reference to the Northern Fringe and the Country Park, I understand that delivery is unlikely until 2025 and that you propose a multi start development and immediate removal of trees, hedgerows and habitats and farmland, much of which directly affects the existing housing stock on the perimeters of the proposed development There seems to be a conflict between existing Orders and what is proposed. Sadly, the Council's Core Strategy seems to be led by developers and not the Council as evidenced by the inadequacies of the existing Master Plan exposed by the planning applications made.	
5772	Private Individual	CS10: Ipswich Garden Suburb	SUPPORT	The plan will deliver the park successfully and in a timely fashion. The Council has listened to local opinion.	
5774	Private Individual	CS10: Ipswich Garden Suburb	SUPPORT	CS10 is sustainable development and the public are being listened to in regard of the garden suburb proposal.	

5526	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Major concerns regarding development of the Garden Suburb. Increased traffic will make Westerfield Road more treacherous. Cannot see how Ipswich has the infrastructure to support such a huge housing development. Concerned that hospitals, GPs and schools are over-subscribed. Why aren't brownfield sites being developed? The Country Park should be delivered as a priority. The population figures are based on high and unfounded immigration figures.	
5317	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The development will have an adverse impact on roads, health services and loss of countryside and habitat needed for health and wellbeing. Traffic impacts have not been considered. Air quality will be affected by traffic and vegetation loss. Access to schools, hospitals and GPs needs to be addressed. Drainage and flooding problems should be addressed. What is the evidence on the need for new homes? The Country Park should be available as soon as vegetation is removed. Residents are not being listened to.	
5767	Tuddenham St Martin Parish Council (Mrs C Frost) [1394]	CS10: Ipswich Garden Suburb	OBJECT	Object to inward-looking focus regarding traffic infrastructure for Ipswich Garden Village, ignoring anything outside the Borough boundary. The Parish Council have severe reservations about the predicted peak hour traffic generation, which is based on surveyed traffic for similar housing areas. Suffolk Constabulary measured traffic through Tuddenham St Martin: 30,000 vehicles travelled through the village in one week, last November. This brings in to disrepute the traffic modelling work using old census data. This concern has been raised before with Ipswich Borough Council and Suffolk County Council but no reply has been received. Concerned about the plan's impacts on the village.	
5191	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The policy to allocate all of the Northern Fringe for development at once is unsound. Brownfield should be preferred for development but there is no brownfield target for development. Both the stated policy to release such a large amount of greenfield land for development at once and no firm target for accompanying brownfield development is unsound environmentally. Also there is a risk that such a large amount of development will not be delivered in the timescale of the plan and may result in piecemeal delivery and which would have damaged the natural environment in the Northern Fringe.	Allocate only a portion of the land which can create a self contained environment for future residents (but only after all infrastructure plans have been detailed and accepted).
5169	Parliament (Mr Ben Gummer) [1404]	CS10: Ipswich Garden Suburb	OBJECT	The location of the secondary school is erroneous and does not contribute to sustainable travel patterns.	IBC need to revisit the location of the secondary school.
5183	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Residents object to the CS without proper consideration of the impact on transport infrastructure and the potential negative consequences of this on our road and the surrounding area.	Proper consideration of infrastructure to ensure that traffic in the North West area of Ipswich, specifically Valley Road/ Norwich Road is not significantly impacted by weight of traffic as a consequence of the proposed new build. This should include detailed analysis of impact and viable proposals to ensure the increased volume of traffic can be effectively managed.
5477	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The Ipswich Garden suburb has already received a planning application from Mersea Homes/CBRE Global investors. The standard of architectural design wasn't inspiring. The road layout did not encourage any form of sustainable transport for instance, NO traffic free corridor to link with existing traffic free routes. The only commitment to sustainable transport was provision of an information pack containing local bus timing for would be residents.	
5264	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	I object to the Northern Fringe development on the following grounds:- -The impact of significant amounts of additional traffic in this part of Ipswich has not been adequately scoped and there are not sufficient measures to deal with this traffic growth. -The impact of such a large development on this part of Ipswich has not been correctly planned for in terms of impact on services / utilities and local amenities	To significantly reduce the scale of the development and ensure that it's impact is properly understood and managed.
5416	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS10: Ipswich Garden Suburb	OBJECT	We support the allocation of Ipswich Garden Suburb as a key element of the spatial strategy but are concerned that CS10 does not provide for effective policy, since it establishes inflexible and overly detailed policy requirements. The land use budget, land use annotations set out on the Proposals Map, and the details set out in Table 8B should be deleted. This level of detail is inappropriate in the context of a strategic allocation which is supported by an already drafted supplementary planning document. The SPD provides a more flexible means of co-ordinating long term development across the Garden Suburb.	The land use budget, land use annotations set out on the Proposals Map, and the details set out in Table 8B should be deleted. A description of the status of the SPD should replace the pre-requisite clause as currently drafted.

5324	Crest Strategic Projects (Josephine Ritter) [1456]	CS10: Ipswich Garden Suburb	OBJECT	We fully support the continued allocation of the IGS (CS10). However, there is no evidence available to demonstrate how the triggers included within supporting Table 8B have been arrived at, and whether they represent an "appropriate stage" for delivery. CS10 and Table 8B do not have due regard to the need for a "comprehensive approach" to the development of IGS as a whole. There are currently no effective mechanisms in place to ensure the delivery of infrastructure or to ensure a collaborative approach to development, which will compromise the deliverability of IGS as a whole.	
24195	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Object to Garden Suburbs on grounds of design, traffic congestion, air quality and drainage	
5688	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Object to Garden Suburbs on grounds of design, traffic congestion, air quality and drainage	
5666	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Going north on Westerfield Road, the field adjacent the road before the houses on the left has always been waterlogged even after drainage improvements. Building on the land will worsen drainage at Westerfield which is lower. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	
5679	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Going north on Westerfield Road, the field adjacent the road before the houses on the left has always been waterlogged even after drainage improvements. Building on the land will worsen drainage at Westerfield which is lower. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	
5653	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Northern Fringe delivery may not be viable over the plan timescales. Plan should be based on co-operating more closely with neighbouring LAs. Plan cannot guarantee timely delivery of the Country Park and so demonstrate it won't harm the integrity of a European designated habitat. Multi-site starts will result in severe congestion and damage the future attractiveness and prosperity of Ipswich. With few new jobs being created in the town centre, residents will have to commute. Where will they park? The land is prime agricultural land. Ponds will not work adequately on clay. Brownfield sites should be developed first.	
5804	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The Country Park Plans are unacceptable	
5808	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	The Country Park Plan is unacceptable	
5817	Private Individual	CS10: Ipswich Garden Suburb	OBJECT	Question the effectiveness of the plan which allocates the whole of the Garden Suburb for approximately 3,500 new dwellings, plus 10,000 homes in other parts of Ipswich. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	
5208	Historic England (Mr Tom Gilbert-Wooldridge) [243]	CS11: Gypsy and Traveller Accommodation	OBJECT	Support but require changes. We welcome improved reference to the historic environment in Part C of the policy, although to ensure accuracy with the NPPF, "historic assets" should be amended to "heritage assets" as a nationally defined policy term.	
5593	National Federation of Gypsy Liaison Groups (Mr Roger Yarwood) [1213]	CS11: Gypsy and Traveller Accommodation	OBJECT	Whilst the policy is generally supported, the requirement that sites should "where possible" be within 1km of services including public transport is too prescriptive, albeit ineffective.	To make the policy more effective, the word "preferably" should replace "where possible" and this applies also to criterion b vii.
5173	Parliament (Mr Ben Gummer) [1404]	CS12/8.121	OBJECT	The target for social rented housing is so high as to exclude meaningful numbers of other forms of affordable housing, especially shared equity.	The document should envisage a better mix of affordable housing types.

5429	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS12/8.124	OBJECT	This paragraph risks concentrating affordable housing in certain phases rather than integrating affordable housing throughout the development. We are concerned about a concentration of council housing that will fail to create sustainable, inclusive and mixed communities in accordance with the NPPF. In this respect we note IBC's planning application for Ravenswood has been called in for inspection on this issue.	There should be a clear goal of integrating affordable housing through the developments including the Ipswich Garden Suburb.
5710	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS12/8.124	OBJECT	SOCs endorse the Northern Fringe Protection group's points on 8.124 [CS12]. This paragraph risks concentrating affordable housing in certain phases rather than integrating affordable housing throughout the development. We are concerned about a concentration of council housing that will fail to create sustainable, inclusive and mixed communities in accordance with the NPPF. In this respect we note IBC's planning application for Ravenswood has been called in for inspection on this issue.	There should be a clear goal of integrating affordable housing through the developments including the Ipswich Garden Suburb.
5174	Parliament (Mr Ben Gummer) [1404]	CS12/8.124	OBJECT	This affordable housing target bears no relation to the numbers being discussed with developers, nor indeed to statements made by cabinet members at Executive. It is misleading.	The document should state a more realistic affordable housing target that reflects its own private discussions and also what cabinet members have stated at Executive.
5132	Private Individual	CS12/8.214	OBJECT	Do not drop the idea of an East Bank Relief Road as this is a better solution to traffic problems identified than a Northern Bypass. Consider an alternative route to the original plan to avoid the two main obstacles. Could extend it to a full Town Centre Relief Road/Orwell Bridge Bypass.	Don't drop idea - investigate alternative route to original plan
24216	EDF Energy Plc (Miss Nicola Forster) [248]	CS12: Affordable Housing	OBJECT	Pleased to see the affordable housing target has been lowered and that a lower amount may be acceptable subject to viability testing. However, the policy does not provide for off-site provision or commuted sums, it would be helpful to provide these alternative arrangements.	Include provision for off-site provision or commuted sums.
5144	The Ipswich Society (Michael Cook) [245]	CS12: Affordable Housing	OBJECT	Support but require changes. We have been unhappy that so many developers have reduced their affordable housing commitment, largely on the grounds of non-viability; we support strongly the independent review system. We feel that the wording here needs to be stronger to ensure developers compliance. We should like to see more transparency over such negotiations.	
5548	Home Builders Federation Ltd (Mr James Stevens) [283]	CS12: Affordable Housing	OBJECT	Policy CS12: Affordable housing The affordable housing policy is potentially unsound because the rates proposed may render the plan undeliverable and therefore the policy may prove ineffective. It is also unclear how a policy requirement of 35% and 15% affordable housing by total floor space would work in practice. It is unclear how this would translate into a dwelling requirement.	
5370	Mersea Homes Limited (Mr Stuart Cock) [346]	CS12: Affordable Housing	OBJECT	The requirement for 'at least' 35% affordable housing provision in the IGS is not justified by the evidence, nor does it contribute to an effective policy. CS12 has reduced the affordable housing target on sites other than IGS. We don't believe there is evidence to support this policy position; rather evidence indicates that the target for the IGS should also be reduced. The NPPF makes it clear (paragraphs 173-177) that local plan policy should not place an undue burden on development. Maintaining a 35% affordable housing target for the IGS will render it unviable, and will stall its delivery.	We consider that the affordable housing requirement for the IGS should be revised to 15%, consistent with other areas of the Borough. The expression of the policy target as being a minimum target ('at least') should be deleted. The recognition that viability assessment may justify a lower affordable housing provision should be retained.
5400	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS12: Affordable Housing	OBJECT	The Ipswich Viability Report showed that 'the indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure.' It is therefore unsound to set a target of 35%. Since the Garden suburb infrastructure costs were developed other costs have arisen due to wastewater infrastructure.	The target for affordable homes on the Garden Suburb should be set at a level which will not compromise delivery of other infrastructure. A detailed Garden Suburb Infrastructure Delivery Plan should be agreed with developers and in place prior to development commencing.
5697	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS12: Affordable Housing	OBJECT	SOCs endorse the Northern Fringe Protections Group's points. The Ipswich Viability Report showed that 'the indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure.' It is therefore unsound to set a target of 35%. Since the Garden suburb infrastructure costs were developed other costs have arisen due to wastewater infrastructure.	The target for affordable homes on the Garden Suburb should be set at a level which will not compromise delivery of other infrastructure. A detailed Garden Suburb Infrastructure Delivery Plan should be agreed with developers and in place prior to development commencing.

5417	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS12: Affordable Housing	OBJECT	The requirement for at least 35% affordable housing provision in the IGS is not justified by the evidence, nor does it contribute to an effective policy. This level of affordable housing provision is not viable in Ipswich. The NPPF makes it clear (paragraphs 173-177) that local plan policy should not place an undue burden on development and that the implications of policy should be tested during plan making. The PBA Viability Testing for the Ipswich Development Plan provides no scenario which models the IGS. On a practical level, a floorspace measure is incapable of being applied to outline planning applications.	We consider that the affordable housing requirement for the IGS should be revised to 15% (with no 'at least' obligation imposed) and that this be applied across the Borough. The recognition that viability assessment may justify a lower affordable housing provision should be retained.
5328	Crest Strategic Projects (Josephine Ritter) [1456]	CS12: Affordable Housing	OBJECT	Policy CS12 states that new developments at IGS will be required to provide for at least 35% on-site affordable housing. We understand that a viability appraisal has been undertaken to inform the delivery of the IGS, but question whether the Council seeking 35% affordable housing is robust and justified, especially when the affordable housing requirement is significantly lower at 15% elsewhere in the Borough. We seek further information on IBC viability assessment and reserve the right to comment further once this has been made available. As currently drafted, CS12 is not considered to be 'justified'.	We therefore seek further information on IBC viability assessment and reserve the right to comment further once this has been made available.
5577	Ipswich Conservative Group [1814]	CS12: Affordable Housing	OBJECT	The percentage of affordable housing is too high and unrealistic. It affects the viability of the Northern Fringe site (Ipswich Garden Suburb) and adds to the financial burden on first time buyers.	
5448	Ipswich Central (Mr Paul Clement) [1423]	CS13/8.134	OBJECT	Generally, we are disappointed that there is no mention of the Greater Ipswich Partnership, now extended to include Ipswich's outlying borough councils and more private sector representation.	
5154	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Without properly defined specific and measurable jobs growth objectives the CS is unsound. To improve clarity and effectiveness 2 jobs targets are required: one for the Borough and one for outside. Measurement indicators should be specified. A recent report by Peter Brett Associates calls into question the viability of developing new offices, industrial units, warehousing and large retail offerings within Ipswich. This challenges the ability of the CS to deliver the massive jobs growth target. For soundness the CS needs to address the severe obstacle to growth identified and produce a specific and realistic jobs target for Ipswich Borough.	To deal with comments above
5223	Associated British Ports [209]	CS13: Planning for Jobs Growth	SUPPORT	ABP welcomes and supports the definition of its land at the Port of Ipswich (at the West Bank and Cliff Quay) as existing employment areas defined on the policies map and the protection of this land for employment uses. This is consistent with the Port's recognition in the NALEP Strategic Economic Plan as part of the port and logistics 'underpinning sector' for the regional economy and the recognition given in the DPD Review of the strategic role and importance of the Port of Ipswich (at paragraphs 5.6, 6.19 and 9.153 - 9.154). ABP supports Policy CS13(b).	
5561	Westerfield Parish Council (Mr Peter Miller) [235]	CS13: Planning for Jobs Growth	OBJECT	The policy indicates that housing allocation is mainly justified by job growth in the Ipswich Policy area. Job growth has stalled over the last few years and the global economic growth forecast for the foreseeable future is not good. Although we support job growth, the figure of 12,500 within the Ipswich boundary which equates to a 17% increase, seems optimistic.	The core strategy should include a statement that if job growth falls short of the predictions, then the housing requirement should be revised down accordingly. The forecast model used to assess the housing requirement based on job growth prediction should take part time and zero contract positions into consideration when predicting housing needs.
5470	Barton Willmore LLP (Mr Mark Harris) for Aqigen [350]	CS13: Planning for Jobs Growth	OBJECT	We note that the Site continues to be allocated as a 'Strategic' Employment Site. This is on the basis that approximately 10ha of land is safeguarded for B Class employment use (see CS paragraph 8.139). Aqigen objects to the Site's designation as 'Strategic' as this is not justified by the Evidence Base and is no longer required. Market conditions and signals provide evidence that the site does not serve a strategic function.	

5690	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Assumptions regarding jobs growth. To achieve the projected numbers of new jobs, Ipswich would have to enjoy economic growth far in excess of the current situation here or elsewhere nationally. Please identify the special features of the local economy that would justify this exceptional growth. Without convincing evidence that these figures are achievable, many other elements of the strategy are put in doubt. A recent report by Peter Brett Associates questions the viability of developing new offices, industrial units, etc. within Ipswich. This also calls into doubt the likelihood that the ambitious growth figures will be achieved.
5665	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Where will people in the 12,500 new jobs go for medical assistance? Concerned that there are no plans for improved hospital or GP facilities to cope with increased usage.
5401	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS13: Planning for Jobs Growth	OBJECT	Based on past trends, jobs are unlikely to grow by 625pa to 2031. EEFM forecasts are based on higher population projections than ONS projections and the sectors forecast to grow don't align with the Strategic Economic Plan. There is over-reliance on retail jobs. The target may not be achievable without government funding and improved transport infrastructure. Job forecasts in the Core Strategies of Ipswich and neighbouring authorities are 26% higher than EEFM and are unrealistic. Unclear whether the target relates to Ipswich or the Ipswich Policy Area. If the latter a separate jobs target must be established. Indicators are needed.
				There should be two targets - one for Ipswich and one for the Ipswich Policy Area. Account should be taken of the large differences between the EEFM model and the ONS and Trend Migration forecasts and how this will impact on job forecasts. 'In the region of' needs to be defined. There should be a specific, measurable and achievable jobs target for the Borough and Ipswich that is in balance with the housing target including defining 'in the region of'. Ipswich should work closely with neighbouring authorities to ensure job forecasts are not double counted, and the results should be published. A measurement indicator should be defined such as the ONS Annual Business Survey and/or Business Register and Employment Survey. Additional measures should be identified to facilitate jobs growth.
5587	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS13: Planning for Jobs Growth	OBJECT	The target of 12,500 jobs to be delivered 2011-2031 is unrealistic and undeliverable as to date there has been no real jobs growth since 2001 and public sector jobs are set to reduce. This is unsustainable and non compliant with the NPPF. SOCS support the aspiration but believe that according to our research and evaluation over time, since 2001, that there is no indication as to how this can or will be achieved. Endorse the Northern Fringe Protection Group's points also.
24070	Private Individual	CS13: Planning for Jobs Growth	OBJECT	It is not known where the 12,500 jobs will come from or whether the retail and shopping policies are achievable and would make Ipswich a better place.
5637	Private Individual	CS13: Planning for Jobs Growth	OBJECT	There is little clear evidence that the number of new jobs referred to in Para 6.8 Objective(b) & CS13 are a realistic forecast. With the decline in local government employment and that of other local major employers, the generation/origin of 2500 net new jobs needs to be properly spelt out.
5773	Private Individual	CS13: Planning for Jobs Growth	OBJECT	The jobs target of in the region of 12,500 jobs is questionably realistic This is questionably sustainable and questionably compliant with the National Planning Policy Framework (NPPF).
5319	Private Individual	CS13: Planning for Jobs Growth	OBJECT	What evidence is there that 12,500 jobs can be created, all the major employers have left Ipswich. There has been no major jobs growth since 2001. Where will the jobs come from?
5491	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Frankly I see little chance of more people cycling or walking without the creation of local jobs and I do not see where these will come from (CS13).
24196	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Not enough jobs in central Ipswich to warrant all the new housing
5689	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Not enough jobs in central Ipswich to warrant all the new housing
5512	Ipswich Liberal Democrats [1703]	CS13: Planning for Jobs Growth	OBJECT	Most of the allocated land and current jobs are on the south/east side of Ipswich or the Town Centre. Planning for a large mainly housing development on the Northern Fringe, essentially functioning as a dormitory for people employed elsewhere, will result in even more congestion.
5574	Ipswich Conservative Group [1814]	CS13: Planning for Jobs Growth	OBJECT	The Plan's strategy is no longer employment led, but has been changed to a housing needs led strategy - 13,350 new dwellings to be built by 2031. The result is that the jobs target has fallen out of kilter with the housing target. This is a move in the wrong direction as the emphasis on housing reduces the priority that should be put on jobs.

5803	Private Individual	CS13: Planning for Jobs Growth	OBJECT	The proposed retail and shopping centre plan is unachievable, do not understand how 12500 jobs will be created.	
5810	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Do not understand how 12500 jobs will be created, the retail and shopping centre plan is unachievable	
5824	Private Individual	CS13: Planning for Jobs Growth	OBJECT	Question the jobs target of in the region of 12,500 jobs is unrealistic and undeliverable as to date there has been no real job growth since 2001 and public sector jobs are set to reduce. This is unsustainable and not compliant with the National Planning Policy Framework (NPPF).	
5443	Ipswich Central (Mr Paul Clement) [1423]	CS14/8.149	OBJECT	Retail Development and Main Town Centre issues (P60) - the emphasis of 'retail' (not just shops, but banks, building societies and food & drink) development must be clustered around the Cornhill and Buttermarket areas and stretching towards the Waterfront. East-west expansion is not realistic.	
5175	Parliament (Mr Ben Gummer) [1404]	CS14/8.150	OBJECT	See above objections to the increase in size of the central shopping area.	Amend this section.
5200	The Theatres Trust (Planning Adviser) [278]	CS14: Retail Development and Main Town Centre Uses	OBJECT	The Trust is pleased Policy CS14 now reflects other uses (arts and culture), acknowledging that the success and vitality of a town centre is more than retail development. However, neither this or Policy DM32 include protection for existing cultural facilities such as theatres. Therefore the document does not reflect NPPF item 70 which states that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities. Also ensure that established facilities and services are retained and able to develop for the benefit of the community.	We recommend that: Policy DM32 is amended to include cultural facilities, as per the above definition; and/or Policy CS14 is amended to state that as well as encouraging new leisure, arts and cultural development, the loss or change of use of existing cultural facilities will be resisted, unless it can be demonstrated that there is no longer a community need or a replacement facility is provided in the immediate vicinity.
5608	Private Individual	CS14: Retail Development and Main Town Centre Uses	OBJECT	Will this be achievable and make Ipswich a better place? A reduction in shop rents should be encouraged so that our shopping centres are more diverse and interesting.	
5402	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS14: Retail Development and Main Town Centre Uses	OBJECT	The Viability Study challenges the deliverability of the Westgate site by stating that small comparison and convenience retail is marginally viable but large format convenience is not viable. This raises uncertainty over deliverability of jobs in the town centre. The Core Strategy does not mention the acquisition of the Sugar Beet Factory site which could take jobs away from the Borough.	The Council needs to show how obstacles to growth identified in the Viability Study can be overcome. There should be a specific, measurable and achievable jobs target for the Borough and Ipswich that is in balance with the housing target including defining 'in the region of'. There should be an explanation of how the acquisition of the Sugar Beet Factory site fits with the Core Strategy. Account should be taken of the large differences between the EEFM model and the ONS and Trend Migration forecasts and how this will impact on job forecasts. The forecast growth of retail, business services and professional services jobs needs to be reviewed. The inclusion of further measures to improve the retail offer and deliver new jobs.
5591	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS14: Retail Development and Main Town Centre Uses	OBJECT	Will the proposed retail and shopping centre plan be achievable and make Ipswich a better place? SOCS endorse the Northern Fringe Protection Group's points also.	
5598	WM Morrison Supermarkets Plc Ltd (Mr Mark Batchelor) [1208]	CS14: Retail Development and Main Town Centre Uses	OBJECT	The wording of the draft Core Strategy is vague. The apparent requirement for an RIA [Retail Impact Assessment] for retail schemes of 200sqm and above is draconian and instead a threshold of 1,000sqm should be adopted.	
5442	Ipswich Central (Mr Paul Clement) [1423]	CS14: Retail Development and Main Town Centre Uses	OBJECT	Retail Development and Main Town Centre issues (P59) - we await details of how the Council proposes to "promote high quality investment and development". In our view, in the retail (including leisure) sector, the issue is not so much vacancy rates (which remain below national averages) but, rather, attracting missing retail names through proactive and entrepreneurial inward investment techniques. We would appreciate urgent discussions on how this should be delivered and whether the responsibility may sit best with ourselves, subject to suitable funding being identified.	

5378	Applekirk Properties Ltd (Teresa Cook) [1452]	CS14: Retail Development and Main Town Centre Uses	OBJECT	CS14 is not positively prepared or justified as the allocations included do not seek to meet the requirement for comparison retail identified in the evidence base. Insufficient sites are identified to meet the requirements for retail floorspace over the plan period, particularly for comparison goods. The evidence base identifies a requirement for additional retail floorspace. A single site is proposed for new retail development in the town centre (Westgate), which is carried forward as an existing commitment. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed.	Policy CS14 should be amended to identify further retail allocations which will address the identified comparison and convenience retail capacity within Ipswich to 2026 and 2031. Sites allocated in the Waterfront for mixed use development comprising small scale retail as well as other commercial, residential, leisure and cultural uses should be allocated to allow for a more flexible quantum for the retail component, to allow for a viable mix of uses to be developed. The Central Shopping Area boundary should be extended to include the main routes through the Merchants Quarter at Star Lane and College Street. The application of Policy DM23 to sites within the Waterfront and the town centre but outside the Central Shopping Area should be removed.
5340	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	CS14: Retail Development and Main Town Centre Uses	OBJECT	The DTZ report provides insufficient evidence to justify the reduction in new retail floorspace. The 2010 retail capacity study should be updated now to inform policy. Policy is not positively prepared and could sterilise Ipswich town centre for medium to large scale retail development for 11 years, having serious implications on the vitality and viability of the centre. Additional specific issues: other prospective development sites (e.g. Jewsons) were not considered by the DTZ report; the reduction of retail floorspace is arbitrary; CS14 restricts large scale retail development to one site.	'... This will enable the delivery in the region of 30,000 sq m net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD. Retail development ...' '...The Council will direct other town centre uses including offices, leisure, arts, culture, tourism and hotel developments into an extended town centre area, with some provision being appropriate in the CSA, Cardinal Park area and Waterfront, in recognition of the area's good accessibility by public transport, cycle and foot...'
5935	Private Individual	CS14: Retail Development and Main Town Centre Uses	OBJECT	Need new shops of good quality to lift Ipswich.	
5749	Private Individual	CS14: Retail Development and Main Town Centre Uses	OBJECT	Will this be achievable and make Ipswich a better place?	
5676	Private Individual	CS14: Retail Development and Main Town Centre Uses	OBJECT	Will this be achievable and make Ipswich a better place?	
5685	Private Individual	CS14: Retail Development and Main Town Centre Uses	OBJECT	Will this be achievable and make Ipswich a better place?	
5131	Private Individual	CS15/8.159	OBJECT	Ensure build of school PRIOR to house development on Northern Fringe so residents have a school for children from the outset	Ensure build of school PRIOR to house development on Northern Fringe so residents have a school for children from the outset
5176	Parliament (Mr Ben Gummer) [1404]	CS15/8.162	OBJECT	This section fails to take account of the report by Frank Field and Naomi Eisenstadt to SCC on the function and location of children's centres.	This statement needs to take account of expert opinion.
5271	Suffolk County Council (Mr Robert Feakes) [356]	CS15: Education Provision	SUPPORT	CS15 recognises the NPPF requirement for a proactive, positive and collaborative approach to ensuring sufficient school places. Planned housing growth is expected to generate additional pupils: Early Years 68; Primary 169; Secondary 122; Sixth Form 27. Schools and early years settings are operating at/close to capacity. Growth in pupil numbers from housing growth and population growth justifies CS15's positive approach and the need for a new primary school in the Town Centre. Windfall development (1800 dwellings) will also generate pupils: Early Years 180; Primary 450; Secondary 324; Sixth Form 72. This overall scale can be managed through expanding existing schools.	
5418	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS15: Education Provision	OBJECT	CS15 refers to safeguarding land for educational uses within IGS through the Proposals Map. Our representations against Policy CS10 demonstrate why it is inappropriate for this level of detail to be shown on the policies map: it is not appropriate to establish detailed and inflexible land use parameters within strategic policies, particularly in the context of an SPD which the Council has already approved on an interim basis. The cross-reference to Policy CS10 can be retained, but it is inappropriate for a specific education site to be identified on the policies map. The wording of CS15 should be amended accordingly.	The reference to the policies map in the final sentence of Policy CS15 should be deleted, consistent with the changes to the policies map which we advocate by separate representation.

5289	Suffolk County Council (Mr Robert Feakes) [356]	CS16: Green Infrastructure, Sport and Recreation	OBJECT	In order to meet the requirements of the Habitats Regulations, the Borough Council should liaise with Natural England to ensure that any recommended measures to avoid likely significant effects on the features of designated sites should be put in place. A further amendment is suggested to ensure Objective 6 is realised in relation to Rights of Way. Wording is suggested to add to the supporting text to CS16, to emphasise the role of the Public Rights of Way network as a major recreational resource, economic asset and means of promoting mental and physical health.	Add to supporting text to CS16: Public Rights of Way are more than just a means of reducing vehicular traffic. In addition to connecting areas and providing opportunities for physical recreation and social interaction, they provide vital access to services, facilities and the natural environment. In this sense, the Public Rights of Way network is a major recreational resource, economic asset and means of promoting mental and physical health. These benefits must be taken into account in the design of development along with the contributions it might make to sustainable routes and open space provision.
5430	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS16: Green Infrastructure, Sport and Recreation	OBJECT	Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	
5712	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS16: Green Infrastructure, Sport and Recreation	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	
5280	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	CS16: Green Infrastructure, Sport and Recreation	OBJECT	The green rim designation has no clear purpose or evidence base to support it- it appears in part to be justified in relation to connecting ecological/ natural and semi-natural green space (although without any clear explanation as to why this is necessary). In a context where the plan is failing to both meet objectively assessed housing need and failing to make use of appropriate development opportunities within the Borough boundary the designation of a green rim is premature and prejudicial to the proper long-term planning of the area.	Reference to the green rim should be removed from Policy CS16, DM33 and DM34 on the basis the proposal lacks any substantive rationale or justification, is premature in advance of the formulation of a proper long term strategy for accommodating the new homes required in the Ipswich area.
5419	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS16: Green Infrastructure, Sport and Recreation	OBJECT	Policy CS16 should incorporate a strategic allocation to the Orwell Country Park, as provided under site allocations policy SP8, with clause (h) redrafted to provide flexibility in the way in which mitigation for impacts on European-designated conservation sites can be secured (and incorporating the provisions of clause (d)). The requirement for new development to contribute to the mitigation of existing deficiencies should be deleted. The function of both the proposed Ipswich Garden Suburb country park and the extension to the Orwell Country Park are the same.	The allocation of land under Policy SP8 of the Site Allocations document for an extension to the Orwell Country Park should be incorporated into the provisions of Policy CS16. Clause (h) should be redrafted to read: "working with partners to ensure the provision of appropriate mitigation to sensitive European sites, including visitor management, new and extended country parks." Additional details of how contributions are to be secured to that mitigation will also be necessary. The requirement under clause (a) for new development to contribute to the mitigation of existing deficiencies should be deleted.
5431	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS17/8.177	OBJECT	Support the goal of ensuring Ipswich receives all the infrastructure it needs but are concerned that the proposed development of the Garden Suburb without adequate new road infrastructure will severely impact on traffic congestion and air quality and affect the quality of life of residents.	
5715	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS17/8.177	OBJECT	SOCS endorse the Northern Fringe Protection Group's points on 8.177 [CS17]. Support the goal of ensuring Ipswich receives all the infrastructure it needs but are concerned that the proposed development of the Garden Suburb without adequate new road infrastructure will severely impact on traffic congestion and air quality and affect the quality of life of residents.	
5177	Parliament (Mr Ben Gummer) [1404]	CS17/8.177	OBJECT	This statement is not complete without recognizing the pressures on existing road infrastructure caused by development at Ravenswood, which is now requiring remedial action by SCC.	The pressures caused by Ravenswood need to be acknowledged so that similar mistakes - new housing without new roads - are not made elsewhere in the town.
5129	Private Individual	CS17/8.182	OBJECT	I do not believe that there is sufficient joint working between IBC and SCC. For any development of the Northern Fringe to take place, a northern relief road must be put in place BEFORE development. Also, additional schools must be put in place BEFORE development. It will be no good having congested roads and extra 15 minutes on all journeys and no schools in place ready for when residents move in. And surrounding roads such as Borrowdale Avenue must have sufficient resource available for traffic calming. And where are all the proposed jobs coming from to warrant this plan.	Ensure sections on infrastructure specially reference northern relief road and school development regarding Northern Fringe development. Justification for the large number of houses on greenfield site such as northern fringe as opposed to brownfield sites still not clear. Specific commitment to surrounding roads receiving resource also regarding infrastructure/traffic calming. All building started to be guaranteed to have section 106 status and delivery prior to development.

5562	Westerfield Parish Council (Mr Peter Miller) [235]	CS17: Delivering Infrastructure	SUPPORT	<p>Policy CS17 Infrastructure</p> <p>The policy states that housing growth should not adversely affect the quality of life of existing communities. It also says that growth requirements across the Borough will place additional pressure on existing infrastructure and will therefore require improvements to be made to existing infrastructure, and the provision of new infrastructure.</p> <p>Westerfield Parish Council supports the strategy to deliver the key infrastructure requirements listed in this policy to ensure existing communities, including Westerfield, can be sustained.</p>	
5120	Lawson Planning Partnership Ltd (Mrs Aarti O'Leary) [241]	CS17: Delivering Infrastructure	OBJECT	<p>NHS England (NHSE) wishes to re-state the objection raised at the previous consultation stage in respect to this policy. Specifically, NHSE objects to the limitation imposed by the policy on securing the direct provision of infrastructure by developers.</p> <p>The policy, as currently worded, would preclude the direct provision of infrastructure by developers, as it allows for mitigation to take the form of a commuted sum or CIL payment only.</p> <p>By introducing a restriction in the way the impacts of development could be mitigated, the policy cannot be considered 'positively prepared', 'justified', 'effective' or 'consistent with national planning policy'.</p>	<p>In order to be considered 'sound' Policy CS17 should be amended as follows:</p> <p>"Each development will be expected to meet site related infrastructure needs and where the provision of new, or the improvement or extension of existing off- site infrastructure is needed to support a new development or mitigate its impacts, developments will be required to contribute proportionately through a Section 106 Agreement or CIL charge."</p>
5209	Historic England (Mr Tom Gilbert-Wooldridge) [243]	CS17: Delivering Infrastructure	SUPPORT	<p>We welcome the reference to heritage and archaeology as part of cultural and community facilities as a broad category of infrastructure to be secured or financed from new development.</p>	
5315	Suffolk County Council (Mr Robert Feakes) [356]	CS17: Delivering Infrastructure	SUPPORT	<p>Whereas Central Government funding can be accessed to provide additional school places for natural population change, the Government intends that development should fund additional need arising from housing growth. Therefore, Policy CS17 is essential for the delivery of Policy CS15 and for ensuring that overall strategy represents sustainable development. Without Policy CS17, the County Council would not consider this document sound. Contributions will also be used to expand and improve existing libraries to meet the demands of growth. Therefore the plan is sound regarding library provision in accordance with NPPF Chapter 8.</p>	
5376	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS17: Delivering Infrastructure	OBJECT	<p>There is no evidence of objectively assessed needs for freshwater and foul water infrastructure in the Borough or IPA, no reference to strategic solutions and no listing in infrastructure tables. The catch-all term 'utilities' should not be used as the Core Strategy will fail without strategic wastewater infrastructure including upgrading the sewage treatment works at Cliff Quay, Anglian Water Ipswich Water Reuse project and a solution for Ipswich Garden Suburb which may require a pipeline to Cliff Quay. Concerned the development will severely impact traffic congestion and air quality. A relief road or bypass to north Ipswich is required.</p>	<p>The latest forecast data on freshwater and foul water infrastructure should be used and compared with the latest baseline data. There should be a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure. Possible solutions and key infrastructure need to be listed.</p>
5566	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS17: Delivering Infrastructure	OBJECT	<p>Concerned about how infrastructure will cope with growth, including hospitals, schools, GPs, social care, drainage, sewerage, transport. Support the aspiration to identify the infrastructure required to deliver development, but wish to see developer contributions for major "off-site" road infrastructure discussed within this plan and the obligation to mitigate adverse traffic effects reinstated. There is no indication of how necessary infrastructure can be achieved. Requirements are unlikely to be met in a timely, sustainable manner. If the plan cannot demonstrate effective joint working to meet cross-boundary strategic priorities, we fear Quality of Life will be at stake. Endorse NFFG points also.</p>	
5638	Private Individual	CS17: Delivering Infrastructure	OBJECT	<p>We already have significant and chronic issues relating to infrastructure and surface drainage, flooding and sewerage. The proposals will only add to these and not improve matters. Heavy rainfall and flash flooding are an increasing feature of our weather patterns and this will not improve matters. CS1 CS17 & CS20</p>	
5629	Private Individual	CS17: Delivering Infrastructure	OBJECT	<p>The CS fails to properly assess development and infrastructure requirements including the cumulative effect of traffic and air pollution. In particular it fails to demonstrate that the Northern Fringe Development would not increase traffic congestion and traffic on the surrounding roads to unacceptable levels. The absence of new roads or sufficient upgrades of existing routes in North East Ipswich indicates that the Council is not taking the additional traffic that will be generated from the Development seriously.</p>	

5624	Private Individual	CS17: Delivering Infrastructure	OBJECT	There are transport issues and the traffic proposals policies CS5, CS17 and CS20 do not address these. It seems that the current services in hospitals, schools, GP surgeries and social care are inadequate. The proposals do not address the infrastructure, services, drainage, flooding and sewerage.	
5192	Private Individual	CS17: Delivering Infrastructure	OBJECT	This policy is unsound as regards development of Ipswich Garden Suburb as mentioned. The Core Strategy seeks to allocate all designated land for development within the plan period before the detailed design and agreement of the supporting infrastructure. Of particular concern is the lack of definition of the required road development. It is unrealistic to build 3500 homes and expect the current Henley/Westerfield/Tuddenham & Colchester road system to accommodate the extra traffic. There will be a huge negative impact on traffic levels in this area on all local residents.	Publication of a combined infrastructure and building development plan such that local people can understand how such a large housing estate can be built and supported whilst maintaining the attractiveness of the area
5489	Private Individual	CS17: Delivering Infrastructure	OBJECT	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development.	
5420	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS17: Delivering Infrastructure	OBJECT	CS17 is confused and contradictory. There is inconsistency and overlap in the presentation of requirements which might emerge through S106, and those that could be delivered by CIL. The Council should present a clear strategy for how it will coordinate infrastructure funding and which mechanisms are to be employed. Policy CS17 should be supported by an Infrastructure Delivery Plan which provides details of the infrastructure, cost and delivery mechanisms required to bring forward development, and should demonstrate that the Duty to Cooperate has been engaged, and that the provisions of paragraphs 162 and 173 of the NPPF have been met.	An Infrastructure Delivery Plan should be prepared to support Policy CS16 [sic]. The policy should, as a whole, be redrafted to clarify the role of S106, the role of CIL, and the relevant infrastructure to be delivered under either mechanism.
5709	Private Individual	CS17: Delivering Infrastructure	OBJECT	It would appear that Ipswich Borough Council has omitted the necessary up-front details from the Core Strategy Plan as to how it intends to implement the infrastructure required for the development of the Ipswich Garden Suburb (Northern Fringe), including mitigation of impact due to: a large number of additional vehicles using the existing local network. Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic	
5497	Ipswich Liberal Democrats [1703]	CS17: Delivering Infrastructure	OBJECT	Ipswich needs an up to date traffic assessment of the impact of this plan up until 2031. The proposed Northern Fringe Development will result in country lanes to the north of Ipswich outside the Borough Boundary being used as rat runs more than they are now with Valley Road at capacity. The Local Plan proposes a Sports Fields along Tuddenham Road to replace the Ipswich School Sports Fields behind Valley Road. This proposal should be part of the Traffic assessment for the Local Plan. Tuddenham Road has no pavements past the hump bridge.	
5799	Private Individual	CS17: Delivering Infrastructure	OBJECT	Transport issues and Traffic proposals, Hospitals, Schools and GP surgeries and Social Care Services will not be able to cope, Infrastructure, Drainage, flooding and sewerage issues, there is no need for 13,500 homes.	
5806	Private Individual	CS17: Delivering Infrastructure	OBJECT	Transport issues, Infrastructure issues with drainage, flooding sewerage, school places, hospital places, GPs and Social Care and there is no need for 13500 homes	
24217	EDF Energy Plc (Miss Nicola Forster) [248]	CS17: Delivering Infrastructure	OBJECT	Financial contributions should be sought in areas where there is an identified deficiency and at a level which ensures that the overall delivery of appropriate development is not compromised. Government guidance states that planning obligations must be fair, reasonable and proportionate.	
5646	Marine Management Organisation (Susan Davidson) [1004]	CS18: Strategic Flood Defence	OBJECT	Policy CS18 - as Ipswich Borough Council falls within a neighbouring reporting area any climate change mitigation measures should reference policy CC1 within the East Offshore and East Inshore Marine Plans.	

5196	Environment Agency (Lizzie Griffiths) [1021]	CS188.186	SUPPORT	We support Policy CS18, which demonstrates the Council's intention to work with partners, such as ourselves, to implement the Ipswich Flood Defence Strategy. We would suggest that the wording in this paragraph is amended to read - 'the tidal surge barrier is unlikely to be in place until the end of 2017'. This amendment should be reflected in other areas of the Local Plan where the completion date is given.	
5178	Parliament (Mr Ben Gummer) [1404]	CS20/8.200	OBJECT	This document and no other IBC document has any substantive policy for cycle or pedestrian infrastructure. These statements of intent are meaningless without it.	This document needs to set a broader and more ambitious ambition for cycle and pedestrian infrastructure across the town.
5393	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS20/8.205	OBJECT	Air quality issues, which are likely to be made worse by increasing traffic congestion, may also impact on the effectiveness of the Core Strategy. The 2014 Air Quality Annual Report (July 2014) shows exceedances of nitrogen dioxide at locations within and outside of the Air Quality Management Areas. The Council needs to provide evidence that air pollution will not breach legal limits.	
5695	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS20/8.205	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Air quality issues, which are likely to be made worse by increasing traffic congestion, may also impact on the effectiveness of the Core Strategy. The 2014 Air Quality Annual Report (July 2014) shows exceedances of nitrogen dioxide at locations within and outside of the Air Quality Management Areas. The Council needs to provide evidence that air pollution will not breach legal limits.	
5180	Parliament (Mr Ben Gummer) [1404]	CS20/8.205	OBJECT	Highway capacity in the town centre is a function of town centre growth and local traffic flows and is only affected by the Orwell Bridge or A14 when either is closed. This statement is misleading, therefore.	The document needs to recognize the central implication of local traffic flows on town centre congestion if it is to draw the correct conclusions about what action to take.
5444	Ipswich Central (Mr Paul Clement) [1423]	CS20/8.207	OBJECT	Key Transport Proposals (P72) - we are concerned at proposals to restrict traffic in the gyratory system to one-lane without substantive alternative measures being put in place. In our view, pedestrian egresses across this area to and from the Waterfront are important but not dependent upon traffic removal.	
5181	Parliament (Mr Ben Gummer) [1404]	CS20/8.209	OBJECT	First stage Local Growth Plan funding has now been secured to study the feasibility of the Wet Dock Crossing.	Feasibility funding should be recognized in the text of the document.
5128	Private Individual	CS20/8.213	OBJECT	None of the transport problems identified under CS20 will be resolved by building a Northern Bypass, because a road built out beyond Westerfield is too far away. It would also blight villages and countryside. It will not relieve Star Lane or assist access to the docks. More beneficial would be an East Bank Town Centre Relief Road, and a new link from Tuddenham Road, through the garden suburb to Westerfield Road, Henley Road and the A14/Bury Road. A Northern Bypass would only help when the Orwell Bridge is closed on a few occasions each year.	Remove any consideration of building a Northern Bypass but investigate other road options I've mentioned.
5145	The Ipswich Society (Michael Cook) [245]	CS20/8.213	OBJECT	Whilst in support of all the aims of this CS, we are not in agreement with the recent recrudescence of support for a Northern By pass. This is unnecessary in normal times as the current A14 and A12 problems can be solved by re-engineering the two trunk routes and upgrading of the Felixstowe branch line. It is a distraction to more sensible, cheaper and sustainable solutions. However, it is worthwhile to explore the possibility of a Northern Relief road in association with the Ipswich Garden suburb .	See above representation
5432	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS20/8.213	OBJECT	Support the inclusion of paragraph 8.213 however disagree that it is not practical to include such a route in the strategy. In our opinion without some form of northern bypass the development of the Ipswich Garden Suburb is unsustainable and should not be supported due to traffic congestion and the potential damaging impact on air quality. Without the northern bypass or link road the CS is unsound and should be rejected.	The Council should work with neighbouring authorities on alternative sites for homes growth. There should be a statement that the Council will work with Suffolk County Council and other local authorities in the Ipswich Policy Area to provide an action plan with the goal of providing additional road capacity via a northern bypass or a link road to the north of the town.
5716	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS20/8.213	OBJECT	SOCS endorse the Northern Fringe Protection Group's points on 8.213 [CS20]. Support the inclusion of paragraph 8.213 however disagree that it is not practical to include such a route in the strategy. In our opinion without some form of northern bypass the development of the Ipswich Garden Suburb is unsustainable and should not be supported due to traffic congestion and the potential damaging impact on air quality. Without the northern bypass or link road the CS is unsound and should be rejected.	The Council should work with neighbouring authorities on alternative sites for homes growth. There should be a statement that the Council will work with Suffolk County Council and other local authorities in the Ipswich Policy Area to provide an action plan with the goal of providing additional road capacity via a northern bypass or a link road to the north of the town.

5130	Private Individual	CS20/8.213	OBJECT	<p>Exploration and feasibility and build of a Northern Bypass is essential PRIOR to proceeding with this plan. It is insufficient to say "council will actively encourage key partners". It must be explored prior to development of Northern Fringe and enacted via section 106 requirements. Recent data shows an increase of 15 minutes on journey time coming from Northern Fringe development alone, nevermind other areas. Current Government Transport Minister has visited Ipswich and recognises a northern relief road/bypass is required, as has Ipswich MP Ben Gummer and countless representations including neighbourhood watch committees and multiple comments on this issue.</p>	<p>Ensure feasibility PRIOR to any Northern Fringe development, and if the relief road/bypass is to proceed, ensure Section 106 coverage to ensure the build is legally required - anything less than this will fail residents, visitors, new residents, and economic viability/attractiveness of Ipswich where what Ipswich can offer will always be overtaken by the view that traffic is a problem and it is not worth living in Ipswich. It is really important government Transport Minister, hundreds/thousands of comments on this from residents and Ipswich MP Ben Gummer's views on this are acted on seriously.</p>
5182	Parliament (Mr Ben Gummer) [1404]	CS20/8.213	OBJECT	<p>This paragraph is factually inaccurate on a number of levels:</p> <ul style="list-style-type: none"> - A Wet Dock Crossing is not an alternative to a northern bypass, which addresses different traffic pressures. - A northern bypass is principally needed to relieve local traffic congestion in north Ipswich resulting from planned housing development, not from very very disruptive but occasional closures of the Orwell Bridge. - Modest proposals for a northern bypass could be accommodated partially or entirely within the Borough boundary. 	<p>It is essential that IC fundamentally reassesses the statements it has made in this paragraph, which are not informed by measurement nor by stakeholder engagement. If adopted, they will force the development of infrastructure on a series of erroneous premises.</p>
5232	Private Individual	CS20/8.213	OBJECT	<p>Recognition of the need for a bypass to address traffic demands of housing growth in North Ipswich is welcome. However, there is nothing to indicate that consent to developments in the Garden Suburb will be conditional on road improvements of this nature.</p> <p>Strong representations in the earlier consultation re the effect on traffic congestion in other parts of Ipswich have been ignored. Specifically the effect on the Norwich Road, Valley Road, Chevallier Street, and Yarmouth Road junctions which are already over-congested and a designated AQMA</p>	<p>A northern link road direct from the Garden Suburb to the A14 at Whitehouse is essential and should be a pre-requisite to any development of the Garden Suburb.</p> <p>This should not be delayed until a complete northern bypass is constructed. A northern bypass has been on the table for many years and appears to be nowhere near coming to fruition.</p>
5541	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	CS20/8.213	OBJECT	<p>Unless substantive evidence of progress on planning for a northern bypass can be demonstrated, paragraph 8.213 is simply an aspirational remark and should be deleted. Paragraph 8.213 continues to raise the prospect of a northern bypass, which has been under consideration for decades, but has limited prospect of delivery in the absence a delivery mechanism. If it were to be brought forward, it would be a significant influence on Ipswich's development strategy, including IGS. Therefore, the Council should be careful in pushing the agenda for a bypass without there being a more certain prospect of this option being properly investigated.</p>	<p>Paragraph 8.213 should be deleted.</p>
5226	Associated British Ports [209]	CS20: Key Transport Proposals	SUPPORT	<p>ABP supports Policy CS20.</p>	
5563	Westerfield Parish Council (Mr Peter Miller) [235]	CS20: Key Transport Proposals	OBJECT	<p>Clarification is needed on the Travel Ipswich scheme to reduce car dependency by 15% over the lifetime of the plan. Is it just within the town centre or the whole of the borough? Does it include the Garden Suburb, which on its own is expected to generate a significance increase in car usage?</p>	<p>Valley Road capacity problems are not mentioned.</p> <p>A concrete solution is needed to solve the east west traffic congestion.</p> <p>More evidence is needed to substantiate the objective of reducing car dependency.</p> <p>Traffic modelling should be undertaken.</p>
5146	The Ipswich Society (Michael Cook) [245]	CS20: Key Transport Proposals	OBJECT	<p>Support but require changes. Two more bridges should be in the Transport Proposals. Firstly, a pedestrian and cycle bridge across the Gipping from the Elton Park site to Boss Hall and the Sugar Beet Factory site and secondly, across the railway to connect the Felixstowe Road "Coop" area and the Foxhall road area. Both of these would improve porosity and encourage walking and cycling where the alternative route is so long that inevitably people will drive. If included in a Policy document now, it will be easier for future planners to insist on them in future applications.</p>	
5268	Suffolk County Council (Mr Robert Feakes) [356]	CS20: Key Transport Proposals	SUPPORT	<p>Paragraphs 8.207 - 8.215 set out a series of strategic highway capacity measures which the Borough Council intends to support. The County Council agrees that the delivery of a Wet Dock Crossing has merit and the project is included within the Local Transport Plan strategy for Ipswich. The County Council is already seeking funding from the New Anglia Local Enterprise Partnership toward progressing the project. Furthermore, the County Council will also lead efforts to investigate proposals for additional highway capacity to the north of Ipswich. This will be carried out with partners, including IBC, through the Ipswich Policy Area Board.</p>	

5338	Northern Fringe Protection Group (Mr Brian Samuel) [976]	CS20: Key Transport Proposals	OBJECT	Whilst CS20 supports feasibility studies into a wet dock crossing and a 'northern bypass or a link road to the north of the town' at this stage such proposals can only be viewed as aspirational. In our opinion without the latter the development of the Ipswich Garden Suburb is unsustainable and should not be supported due to traffic congestion and the potential damaging impact on air quality. Without the northern bypass or link road the CS is unsound and should be rejected.	The Council should work with neighbouring authorities on alternative sites for homes growth. There should be a statement that the Council will work with Suffolk County Council and other local authorities in the Ipswich Policy Area to provide an action plan with the goal of providing additional road capacity via a northern bypass or a link road to the north of the town.
5571	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS20: Key Transport Proposals	OBJECT	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Endorse the Northern Fringe Protections Group's points also.	
5639	Private Individual	CS20: Key Transport Proposals	OBJECT	The transport issues and proposals ref. CS5, CS17 and CS20 are not adequately dealt with and will result in many years of gridlock and adverse impact for both residents and businesses alike in the north of Ipswich. This will have knock-on impact elsewhere in the town as drivers seek to avoid pinch points. The plan will not remedy or provide sufficient mitigation against this.	
5630	Private Individual	CS20: Key Transport Proposals	OBJECT	The CS fails to properly assess development and infrastructure requirements including the cumulative effect of traffic and air pollution. In particular it fails to demonstrate that the Northern Fringe Development would not increase traffic congestion and traffic on the surrounding roads to unacceptable levels. The absence of new roads or sufficient upgrades of existing routes in North East Ipswich indicates that the Council is not taking the additional traffic that will be generated from the Development seriously.	
5625	Private Individual	CS20: Key Transport Proposals	OBJECT	There are transport issues and the traffic proposals policies CS5, CS17 and CS20 do not address these.	
5764	Tuddenham St Martin Parish Council (Mrs C Frost) [1394]	CS20: Key Transport Proposals	OBJECT	The plan seems to be oblivious to risk: dismissing the consequences of no clear strategy for East-West traffic (particularly around the wet dock area), dismissing the A14 and northern Ipswich traffic issues as out of its scope, having an inward-looking focus regarding traffic infrastructure for Ipswich Garden Village, ignoring areas outside the Borough boundary. The Key Transport Proposal is not sound. The proposal to work with neighbouring authorities and Suffolk County Council to investigate a northern bypass raises concerns as any northern bypass would result in Westerfield, and neighbouring villages, losing their individual identities, and becoming part of Ipswich.	
5490	Private Individual	CS20: Key Transport Proposals	OBJECT	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development.	
5179	Parliament (Mr Ben Gummer) [1404]	CS20: Key Transport Proposals	OBJECT	There is no support here for the following key infrastructure policies which will profoundly affect Ipswich: - upgrade of the GEML - upgrade of the A12 - upgrade of the A14	The document should support these key transport initiatives.
5654	Private Individual	CS20: Key Transport Proposals	OBJECT	Traffic congestion has always been a key concern. Plan fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Updated traffic and air quality modelling should be undertaken and development not permitted unless effective mitigation methods can be implemented. Freshwater and waste water infrastructure needs to be objectively assessed and key infrastructure listed. Risks to delivery should be identified. Following the introduction of the computer based traffic light control system, traffic is worse than ever. Difficulties are experienced in Valley Road and Henley Road and the pedestrian crossing is dangerous.	
5511	Ipswich Liberal Democrats [1703]	CS20: Key Transport Proposals	OBJECT	Policy CS20 (P. 69). The Council wants to take traffic out of the Waterfront Northern Key and reduce Star Lane traffic. Alternative is proposed a Wet Dock Crossing (P70) 8.210. I agree that with 8.212. I do not agree that 8.213 should be regarded as an Alternative. Ipswich needs both. The Wet Dock Crossing will support the proposal for taking road capacity out of the Waterfront but without extra road capacity in the north of Ipswich the proposed large Northern Fringe Development should not be allowed to take place.	Ipswich needs an up to date traffic assessment of the impact of this plan up until 2031.

5583	Ipswich Conservative Group [1814]	CS20: Key Transport Proposals	OBJECT	<p>A reduction of 15% in the use of cars is not realistic.</p> <p>The impact of the extensive additional housing on the transport infrastructure of the town also gives cause for concern. The current road network is already under pressure and will find it difficult to cope with the extra traffic generated by the new housing. Air quality will also be put at risk.</p>	
5800	Private Individual	CS20: Key Transport Proposals	OBJECT	<p>Transport issues and Traffic proposals - the plan is not justified or effective.</p>	
5809	Private Individual	CS20: Key Transport Proposals	OBJECT	<p>Transport issues and traffic proposals - the plan is not justified or effective.</p>	
5549	Home Builders Federation Ltd (Mr James Stevens) [283]	DM1 - Sustainable and Construction	OBJECT	<p>Policy DM1: Sustainable design and construction</p> <p>Elements of the policy are unsound because the requirements conflict with national policy.</p>	
5371	Mersea Homes Limited (Mr Stuart Cock) [346]	DM1 - Sustainable and Construction	OBJECT	<p>The provisions of DM1 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF. The Code for Sustainable Homes is not mandatory, and is to be replaced by provisions under the Building Regulations. These critical national policy imperatives must be reflected in DM1 if it is to be a sound policy. The Council's whole-plan viability evidence (which we consider optimistic) demonstrates that the obligations set by DM1 have a detrimental effect on viability to the effect that it could determine whether sites would be deliverable.</p>	<p>Unless it can be demonstrated that the provisions of Policy DM1 do not constrain development, the policy should be deleted. In any event, Policy DM1 should be redrafted to accord with national policy on sustainable construction with reference to emerging Building Regulations. The cross reference to Policy DM4 is unnecessary and can be deleted, since the policies of the plan must be read as a whole in any event.</p>
5600	WM Morrison Supermarkets Plc Ltd (Mr Mark Batchelor) [1208]	DM1 - Sustainable and Construction	OBJECT	<p>The requirements of the policy are too stringent. Viability should be taken into account or else the policy could prevent development from coming forward.</p>	
5422	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM1 - Sustainable and Construction	OBJECT	<p>The provisions of Policy DM1 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF, which requires sustainability policies to be set in a way which is consistent with the Government's own approach. The Code for Sustainable Homes is not mandatory, and is to be replaced by provisions under the Building Regulations. The Council's whole-plan viability evidence demonstrates that the obligations set by Policy DM1 have a clearly detrimental effect on viability and could determine the deliverability of sites.</p>	<p>Unless it can be demonstrated that the provisions of Policy DM1 do not constrain development, the policy should be deleted. In any event, Policy DM1 should be redrafted to accord with national policy on sustainable construction with reference to emerging Building Regulations. The cross reference to Policy DM4 is unnecessary and can be deleted, since the policies of the plan must be read as a whole in any event.</p>
5329	Crest Strategic Projects (Josephine Ritter) [1456]	DM1 - Sustainable and Construction	OBJECT	<p>Emerging Policy DM1 part a. seeks that all new build residential developments achieve a minimum of Level 4 for the Code for Sustainable Homes standard or equivalent. Whilst we in part support the principle of this emerging policy and welcome the removal of the onerous requirement to achieve Code Level 5 and 6 [in adopted policy DM1], we query whether seeking Code Level 4 on all development sites, we query the need for the Council to include such a policy given the Code requirements are dictated by Building Regulations.</p>	
5550	Home Builders Federation Ltd (Mr James Stevens) [283]	DM2 - Decentralised Renewable or Low Carbon Energy	OBJECT	<p>The policy is unsound because it is contrary to national policy.</p>	
5373	Mersea Homes Limited (Mr Stuart Cock) [346]	DM2 - Decentralised Renewable or Low Carbon Energy	OBJECT	<p>The provisions of Policy DM2 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF. The evidence base which purports to assess the viability implications of the policy demonstrates that this policy has a significant impact on the viability of sites, and will therefore affect deliverability. The Borough's own evidence also failed to assess the implications of the Policy on the IGS. The policy cannot therefore be considered the most appropriate strategy.</p>	<p>Policy DM2 should be deleted, or alternatively should be reworded to encourage, rather than require the provision of decentralised energy sources.</p>
5366	Gladman Developments (Mr Russell Spencer) [1437]	DM2 - Decentralised Renewable or Low Carbon Energy	OBJECT	<p>Gladman reiterate the point made above when discussing policy CS1 that in seeking to ensure that all new build development of 10 or more dwellings shall provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources, this policy should comply with the requirements set out in paragraphs 173 and 174 of the Framework.</p>	

5423	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM2 - Decentralised Renewable or Low Carbon Energy	OBJECT	The provisions of Policy DM2 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF, which requires sustainability policies to be set in a way which is consistent with the Government's own approach. The evidence base which purports to assess the viability implications of the policy demonstrates that it has a significant impact on the viability of sites, and will therefore affect deliverability. NPPF paragraph 173 is clear that this adverse consequence should be avoided. Its implications for the IGS have not been assessed.	Policy DM2 should be deleted, or alternatively should be reworded to encourage, rather than require the provision of decentralised energy sources.
5330	Crest Strategic Projects (Josephine Ritter) [1456]	DM2 - Decentralised Renewable or Low Carbon Energy	OBJECT	Emerging Policy DM2: Decentralised Renewable or Low Carbon Energy replicates adopted Policy DM2 by requiring all new development of 10 or more dwellings to provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources. We object to the principle of this policy as there is no robust evidence base to justify the requirement and there has been no regard to potential viability issues.	
5551	Home Builders Federation Ltd (Mr James Stevens) [283]	DM3 - Provision of Private Outdoor Amenity	OBJECT	This policy is unsound because it is unjustified.	
5434	Northern Fringe Protection Group (Mr Brian Samuel) [976]	DM3 - Provision of Private Outdoor Amenity	OBJECT	Object to the change from 'rear garden area' to 'private garden area' as this will result in much smaller dwelling plots, some with no rear gardens at all and more cramming together of properties including infill. Welcome the stipulation in 9.21 that 'garden sizes need to be calculated independently of any parking space(s) to be provided.'	Amend 'private garden area' to 'rear garden area' for all houses, bungalows and ground floor maisonettes.
5717	Save Our Country Spaces (Mrs Barbara Robinson) [978]	DM3 - Provision of Private Outdoor Amenity	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Object to the change from 'rear garden area' to 'private garden area' as this will result in much smaller dwelling plots, some with no rear gardens at all and more cramming together of properties including infill. Welcome the stipulation in 9.21 that 'garden sizes need to be calculated independently of any parking space(s) to be provided.'	Amend 'private garden area' to 'rear garden area' for all houses, bungalows and ground floor maisonettes.
5439	Northern Fringe Protection Group (Mr Brian Samuel) [976]	DM3/9.21	SUPPORT	We welcome the stipulation in Para 9.21 that 'Garden sizes need to be calculated independently of any parking space(s) to be provided.'	
5718	Save Our Country Spaces (Mrs Barbara Robinson) [978]	DM3/9.21	SUPPORT	SOCS endorse the Northern Fringe Protection Group's points. We welcome the stipulation in Para 9.21 that 'Garden sizes need to be calculated independently of any parking space(s) to be provided.'	
5197	Environment Agency (Lizzie Griffiths) [1021]	DM4 - Development and Flood Risk	OBJECT	We are very supportive of Policy DM4 We are pleased to note that the policy ensures that new development does not increase flood risk overall from any form of flooding. We consider that the policy could mention that the benefits of using SuDS include both flood risk and water quality. Given the future of Suffolk County Council, as Lead Local Flood Authority, in surface water management, we would recommend you ensure that the County Council have been consulted on the wording of this policy.	
5198	Environment Agency (Lizzie Griffiths) [1021]	DM4/9.29	SUPPORT	We are pleased that Table 7 includes the recommendation that 'layout should be designed so that the most vulnerable uses are restricted to higher ground at lower risk of flooding, with more flood-compatible development (parking, open space etc.) in the highest risk areas'.	
5210	Historic England (Mr Tom Gilbert-Wooldridge) [243]	DM5 - Design and Character	SUPPORT	We welcome Part (e) of the policy relating to the special character and distinctiveness of Ipswich. The completion of the Urban Characterisation Study SPD would help to support this policy.	
5552	Home Builders Federation Ltd (Mr James Stevens) [283]	DM5 - Design and Character	OBJECT	Part I of the policy requiring the provision of public art is contrary to the advice in the NPPG and we recommend this should be deleted.	

5424	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM5 - Design and Character	OBJECT	The provisions of Policy DM5(f) are not consistent with national policy and are contrary to paragraph 173 of the NPPF. DM5(f) [and paragraph 9.51] implies an obligation for homes to be built to Lifetime Homes Standard, but doesn't make this clear. Thus policy DM5 is ambiguous and establishes obligations which are inconsistent with national planning policy, which recognises that the delivery costs of policies must be taken into account. Other obligations e.g. "very good architectural quality" and "highly sustainable" buildings are subjective and without justification. The public art policy has been deleted, and clause (i) should therefore be deleted.	Clauses (f) and (i) of Policy DM5 should be deleted.
5331	Crest Strategic Projects (Josephine Ritter) [1456]	DM5 - Design and Character	OBJECT	DM5 part i. introduces the provision of public art where this would be required to enhance the public realm and/or reinforce a sense of place. This could include new installations where this would be commensurate to the scale and type of development. We do not object to IBC seeking public art but expect any requests to be proportionate in scale and to allow for flexibility, taking into account the other contributions sought, to ensure that new developments remain viable and deliverable. The definition of 'art' should be flexible and cover the delivery of a wide range of products/installations.	
5212	Historic England (Mr Tom Gilbert-Wooldridge) [243]	DM6 - Tall Buildings	OBJECT	While we generally welcome the criteria within this policy regarding tall building proposals, it is not clear whether this policy has been reviewed since the adoption of the original Core Strategy to see whether it remains justified and effective. We maintain that a comprehensive and thoroughly modelled policy is required, as well as a general policy approach on the identification of strategic views. Part (j) of the policy helpfully refers to conservation areas, but should be strengthened by reference to listed buildings and other heritage assets.	To make the policy and plan sound, Part J should be amended to read: "the effect of the building in terms of its silhouette and impact on strategic views, with particular reference to conservation areas, listed buildings and other heritage assets, and the wooded skyline visible from and towards central Ipswich"
5675	Ministry of Defence (Louise Dale) [1057]	DM6 - Tall Buildings	OBJECT	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	
5213	Historic England (Mr Tom Gilbert-Wooldridge) [243]	DM8 - Heritage Assets and Conservation	OBJECT	While we welcome amendments and additions to Policy DM8 following the previous consultation, the policy needs further amendments and additions in order to make it sound.	In order to make the plan and policy sound: * The policy should refer to scheduled monuments and historic parks and garden (both designated and non-designated) * The listed building section should address demolition issues * Point (i) of the conservation area section should refer to buildings/structures that do not make a positive contribute to the character and significance of the conservation area * The third paragraph of the archaeology section should reflect the wording of the fourth paragraph with regarding to programmes of archaeological works. * The final paragraph should be headed "climate change"
5282	Suffolk County Council (Mr Robert Feakes) [356]	DM8 - Heritage Assets and Conservation	OBJECT	The County Council understands the role of the Area of Archaeological Importance (AAI) to be descriptive; i.e. alerting developers to areas where the high potential for significant archaeological assets may necessitate detailed archaeological investigation as part of the development process. At present, DM8 applies differing investigation procedures for inside and outside the AAI. Whilst the County Council supports a more stringent pre-determination investigation requirement within the AAI, the reference to applying archaeological monitoring conditions as standard is not appropriate given the significance of the Historic Environment Record in this part of Ipswich.	To clarify the role of the AAI, to better protect archaeological assets within Ipswich and to allow greater flexibility in the way in which requirements for investigation and recording are carried out, the County Council proposes that the archaeological paragraphs of DM8 are redrafted as follows. Within the Area of Archaeological Importance defined on the policies maps, development will not be permitted which may disturb remains below ground, unless the proposal is supported by an appropriate assessment of the archaeological significance of the site and, if necessary, a programme of archaeological investigation in proportion to the significance of archaeological remains. This should be undertaken at an appropriate stage prior to determination and early consultation with relevant agencies is encouraged.
5133	Suffolk Preservation Society (Bethany Philbedge) [1352]	DM8 - Heritage Assets and Conservation	OBJECT	Support but require changes. DM8 refers to proposals to listed buildings which may affect the fabric or setting of the building. The setting of listed buildings can also be impacted by proposals to nearby unlisted buildings - also covered by the statutory duty set out in para 9.66 - a policy which aims to 'protect our assets' should reflect this.	

5332	Crest Strategic Projects (Josephine Ritter) [1456]	DM8 - Heritage Assets and Conservation	OBJECT	Emerging Policy DM8: Heritage Assets and Conservation replicates adopted Policy DM8, but also combines the archaeology element of adopted Policy DM9: Buildings of Townscape Interest. Emerging Policy DM8 at part b. Conservation Areas, states that the position, height, mass and materials of a proposed building shall pay regard to the character of adjoining buildings and the area as a whole. Whilst we do not object to this policy, the weight that should be attached to the character of buildings should be proportionate to their status and this should be reflected in the policy wording to ensure that it is 'justified'.	
5286	Suffolk County Council (Mr Robert Feakes) [356]	DM8/9.73	OBJECT	The following words should be inserted in the supporting text for DM8 to help define the reasoning behind the AAI: 'The settlement of Ipswich has developed through Saxon, Medieval and later periods, leaving a legacy of history below ground which tells the complex story of the town's evolution. To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damages, the planning process must ensure that development proposals respect archaeologically important sites.' The Borough Council should also consider amending the Core Strategy to reflect the emerging proposal for an Archaeological Supplementary Planning Document.	The following words should be inserted in the supporting text for DM8 to help define the reasoning behind the AAI: The settlement of Ipswich has developed through Saxon, Medieval and later periods, leaving a legacy of history below ground which tells the complex story of the town's evolution. To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damaged, the planning process must ensure that development proposals respect archaeologically important sites. The Borough Council should also consider amending the Core Strategy to reflect the emerging proposal for an Archaeological Supplementary Planning Document.
5214	Historic England (Mr Tom Gilbert-Wooldridge) [243]	DM9 - Buildings of Townscape Interest	SUPPORT	We broadly welcome this policy and the recognition given to buildings of townscape interest as part of a local list approach.	
5134	Suffolk Preservation Society (Bethany Philbedge) [1352]	DM9 - Buildings of Townscape Interest	OBJECT	Support but require changes. The policy should be expanded. Policy DM9 refers to Buildings of Townscape Interest. The NPPF para 135 refers to non-designated heritage assets which could include features other than buildings such as a monument or important view - these can also be included on a local list. Their importance can be due to social/historical interest and should not be restricted to that of townscape interest.	
5290	Suffolk County Council (Mr Robert Feakes) [356]	DM10 - Protection of Trees and Hedgerows	OBJECT	The Borough Council may consider a minor amendment to the supporting text of Policy DM10 to make reference to the Hedgerow Regulations.	The Borough Council may consider a minor amendment to the supporting text of Policy DM10 to make reference to the Hedgerow Regulations.
5510	Northern Fringe Protection Group (Mr Brian Samuel) [976]	DM10 - Protection of Trees and Hedgerows	OBJECT	In order to be sustainable Policy DM10 needs to reference the Hedgerow Regulations 1997 and the CS needs to state that "important hedgerows" will be protected from being removed (uprooted or destroyed).	The Core Strategy needs to state that "important hedgerows" will be protected from being removed (uprooted or destroyed).
5723	Save Our Country Spaces (Mrs Barbara Robinson) [978]	DM10 - Protection of Trees and Hedgerows	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. In order to be sustainable Policy DM10 needs to reference the Hedgerow Regulations 1997 and the CS needs to state that "important hedgerows" will be protected from being removed (uprooted or destroyed).	The Core Strategy needs to state that "important hedgerows" will be protected from being removed (uprooted or destroyed).
5530	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM10 - Protection of Trees and Hedgerows	OBJECT	DM10 clause (b) fails to anticipate that there may be other sound reasons for requiring works to a tree. The Policy should be reworded to reflect such cases. It restricts the criteria under which specific arboriculture activities will be permitted. However, landscape considerations (e.g. the creation of new green spaces) or transport considerations (e.g. the need to serve access to or within a development site) may offer sound justification for felling trees. In the context of a replacement policy being applied under DM10, these would be sound alternative reasons for undertaking works to a tree.	Clause (b) of DM10 should be rewritten to acknowledge that other landscape or access reasons may justify works to a tree.
5440	Northern Fringe Protection Group (Mr Brian Samuel) [976]	DM17 - Transport and Access in New Developments	OBJECT	It is unclear how 'significant adverse impacts' in bullet point (a) will be defined.	The plan needs to specify how an adverse impact will be judged.
5719	Save Our Country Spaces (Mrs Barbara Robinson) [978]	DM17 - Transport and Access in New Developments	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. It is unclear how 'significant adverse impacts' in bullet point (a) will be defined.	The plan needs to specify how an adverse impact will be judged.

5367	Gladman Developments (Mr Russell Spencer) [1437]	DM17 - Transport and Access in New Developments	OBJECT	Gladman has concerns that the current wording of this requirement takes too narrow an approach to sustainability, one based on simple distances to services, in this case public transport. Gladman believe that this is an outdated approach to understanding sustainability and does not take into account changes in people's lifestyles, the increase in levels of homeworking and the availability of an increasing range of services online and via home delivery, which are all serving to change people's travel patterns.	Gladman believes the wording of this policy should be amended to introduce an element of flexibility to make clear that whilst the distance specified should be a consideration, it should be weighted in the planning balance against the positive benefits of a particular scheme when determining the acceptability of development proposals.
5531	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM17 - Transport and Access in New Developments	OBJECT	Policy DM17 includes obligations which are not justified, nor have they been costed or assessed for their impact on viability. Clauses (c), (e) and (f) should be deleted. They are contrary to the requirement of paragraph 173. The obligations should be deleted unless and until evidence demonstrates that these measures are necessary, and that their costs do not adversely affect viability.	Clauses (c), (e) and (f) should be deleted.
5334	Crest Strategic Projects (Josephine Ritter) [1456]	DM17 - Transport and Access in New Developments	OBJECT	Emerging Policy DM17 part c. seeks to incorporate electric charging points and part f. seeks safe and convenient access to public transport within 400m. The provision of electric charging points within a development will not be necessary for development to come forward in a sustainable way. DM17f. is not necessary for all development sites, e.g. it does not take into account sites that are within reasonable walking distance of local services which would not necessarily need to be served by public transport. The policy should therefore be reworded to reflect individual site circumstances to ensure it is 'justified' and 'effective'.	The policy should therefore be reworded to reflect individual site circumstances to ensure it is 'justified' and 'effective'.
5148	Private Individual	DM17 - Transport and Access in New Developments	OBJECT	Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution fresh water and wastewater. As such the plan will not be effective and is unsound. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation methods can be implemented. Freshwater and wastewater infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	Change re comments above
5269	Suffolk County Council (Mr Robert Feakes) [356]	DM17/9.101	OBJECT	National Guidance refers to the need for Transport Assessments to be proportionate to the scale and nature of development. Whilst the commitment to sustainable transport solutions is welcomed, IBC's proposed threshold of ten dwellings for a full Transport Assessment is tougher than the approach previously applied by national government and does not consider the role of Transport Statements. The County Council wishes to apply a more robust approach than that in the 2007 Guidance, but believes that indicative thresholds would be more appropriate. Depending on other feedback, ten dwellings would be a useful indicative threshold for requiring a Transport Statement.	
5529	RCP Parking Ltd [1418]	DM18 - Car and Cycle Parking	OBJECT	We think that there is a need for the Council to develop a policy for long and short-stay parking which reflects the real-time economy and is integral to parking strategy for the town (both long and short stay)	An addition to policy DM18 is suggested :- the use of vacant sites within the designated Central Parking Core for additional short-term parking facilities may be permitted.
5445	Ipswich Central (Mr Paul Clement) [1423]	DM18 - Car and Cycle Parking	OBJECT	Car and Cycle Parking (P105) - there seems to be a lack of comprehension that the majority of shoppers and visitors to the town centre do, and will always, prefer to use their car. Retailers also prefer car-borne shoppers who are likely to buy more. It is imperative that Ipswich does everything that it can to attract back the car user, particularly after the Travel Ipswich project that has done much to damage reputations. Ipswich must not be perceived or, worse still become, anti-car.	
5335	Crest Strategic Projects (Josephine Ritter) [1456]	DM18 - Car and Cycle Parking	SUPPORT	Emerging Policy DM18: Car and Cycle Parking - this policy proposes to move away from maximum parking standards and seeks to ensure developments comply with the minimum standards of car and cycle parking adopted by the County Council. We support this policy.	

5447	Ipswich Central (Mr Paul Clement) [1423]	DM20 - The Central Shopping Area	OBJECT	Central Planning Area (P107) - the extension of the retail boundary to allow for retail development on the Westgate site is unacceptable for two reasons. Firstly, it is completely contrary to the Council Masterplan and BID Vision to concentrate development around a north-south axis. Secondly, Ipswich has been placed 'on hold' for much retail development and retailer acquisition through clinging for far too long to the uneconomic prospects for a retail-led development on the Cox Lane/Tacket Street site. Simply moving this to the other side of the town will achieve nothing more than creating more uncertainty.	
5446	Ipswich Central (Mr Paul Clement) [1423]	DM20 - The Central Shopping Area	OBJECT	Central Planning Area (P107) - the zoning policy for A1 to A5 is admirable but possibly unrealistic and unresponsive to changing town centres. Town centres need to change and alternative uses must not be deterred through unduly restrictive planning policy.	
5379	Applekirk Properties Ltd (Teresa Cook) [1452]	DM20 - The Central Shopping Area	OBJECT	Object to Policy CS20 as it cannot be considered to have been positively prepared and is not justified as the strategy will not provide the future capacity for comparison and convenience retail floorspace identified in the evidence base. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed. We consider that Policy CS20 fails to do this. The focus on the Central Shopping Area alone for major new retail development (here defined as over 200sqm) will not meet the requirements for retail floorspace over the plan period.	Policy CS20 should be amended to allow for major retail development within the town centre to address the identified comparison and convenience retail capacity within Ipswich to 2026 and 2031. Alternatively, the Central Shopping Area boundary should be extended to include the main routes through the Merchants Quarter at Star Lane and College Street.
5471	Barton Willmore LLP (Mr Mark Harris) for AquiGen [350]	DM21 - District and Local Centres	OBJECT	Re. the extension of the Nacton Road District Centre under Policy DM21: District and Local Centres and Proposals Map. There are no immediately available opportunities to the south and west of the Centre to support a viable extension. Instead, given the strong and positive linkage between the two locations, we recommend an expansion of the District Centre boundary to include the Site [Futura Park].	There are no immediately available opportunities to the south and west of the Centre to support a viable extension. Instead, given the strong and positive linkage between the two locations, we recommend an expansion of the District Centre boundary to include the Site.
5274	Suffolk County Council (Mr Robert Feakes) [356]	DM21 - District and Local Centres	OBJECT	CS15 encourages early education facilities to be located within/adjacent to district/local centres or co-located with schools, which is supported. However, Policy DM21 protects district and local centres for retail uses. Community facilities have significant value on high streets. They include early education (Appendix 4), but the criteria in DM21 set the bar too high. 'Prominent positions' (part (i)) is difficult to define and therefore ineffective. The required marketing strategy (Part (ii)) will restrict the County Council's ability to provide new early years facilities. Paragraph f. regarding accessibility is difficult to achieve when facilities are aimed at specific age groups.	Whilst the intention to promote retail uses in district and local centres is appropriate, this approach [DM21] taken by the Borough restricts community uses and could be considered counter to Chapter 8 of the Framework [and policy CS15]. A relaxation of this approach is sought.
5569	Planware Ltd (Donna Smith) [1223]	DM21 - District and Local Centres	OBJECT	Planning policy must be consistent with the principles set out within the Framework. Each policy should "plan" positively for development; be justified; effective; and consistent with the Framework. If any policy that is not compliant with one of these four tests, it cannot be considered sound (see the Framework).	The proposed policy is considered unsound and fails to meet the four tests of the Framework. It is not positively prepared; justified; effective; or consistent with national planning policy. It should therefore be deleted in its entirety. No alternative wording or alterations can be suggested that would make the proposed policy sound.
5599	WM Morrison Supermarkets Plc Ltd (Mr Mark Batchelor) [1208]	DM23 - Retail Proposals Outside Defined Centres	OBJECT	The wording of the draft Core Strategy is vague. The apparent requirement for an RIA [Retail Impact Assessment] for retail schemes of 200sqm and above is draconian and instead a threshold of 1,000sqm should be adopted.	
5380	Applekirk Properties Ltd (Teresa Cook) [1452]	DM23 - Retail Proposals Outside Defined Centres	OBJECT	Object to Policy CS23 as it cannot be considered to have been positively prepared and is not justified as the strategy will not provide the future capacity for comparison and convenience retail floorspace identified in the evidence base. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed. We consider that Policy CS23 fails to do this. The focus on the Central Shopping Area alone for major new retail development (here defined as over 200sqm) will not meet the requirements for retail floorspace over the plan period.	Policy CS23 should be amended to allow for major retail development within the town centre to address the identified comparison and convenience retail capacity within Ipswich to 2026 and 2031. Alternatively, the Central Shopping Area boundary should be extended to include the main routes through the Merchants Quarter at Star Lane and College Street.
5532	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM24 - Affordable Housing	OBJECT	Matters such as sustainable construction criteria and parking are managed by other plan policies which apply to all development in the Borough. There is no benefit to the inclusion of clauses (a) and (d) of Policy DM24, since other plan policies will already control those matters. They should be deleted.	Clauses (a) and (d) of Policy DM24 should be deleted.

5336	Crest Strategic Projects (Josephine Ritter) [1456]	DM24 - Affordable Housing	OBJECT	DM24 states that affordable housing provision will be required in accordance with Policy CS12 and replicates adopted Policy DM24. This emerging Policy is not 'justified' or 'effective'. As noted above, the appropriate Code Level is determined by Building Regulations and therefore should not be dictated by planning policy. We also consider part d. of the policy to be unreasonable. Evidence suggests that car ownership among affordable housing occupants is lower than market housing, and therefore the requirement to provide the same ratio of parking is considered unnecessary. We therefore seek the removal of part d.	The appropriate Code Level is determined by Building Regulations and therefore should not be dictated by planning policy [part a.]. The requirement to provide the same ratio of parking is considered unnecessary. We therefore seek the removal of part d.
5230	Associated British Ports [209]	DM25 - Protection of Employment Land	OBJECT	Support Policy DM25. Whilst Policy DM25 will serve to safeguard existing employment areas, care should be exercised when development proposals are brought forward in the vicinity of these areas (consistent, perhaps, with other policies of the DPD) to ensure that this new development does not prejudice existing employment uses and business operations which are "appropriately located" (consistent with the key strategic challenges for Ipswich identified at paragraph 5.25). ABP requests, therefore, that the local planning authority does not apply the policies of the Core Strategy and Policies DPD Review uncritically and in isolation in exercising its development control functions.	
5472	Barton Willmore LLP (Mr Mark Harris) for AquiGen [350]	DM25 - Protection of Employment Land	OBJECT	This Policy provides the basis for controlling the development of non B-class uses on Employment Sites. In addition to our comments above on the relationship of the employment definition with the NPPF, we consider the levels of control imposed in the policy to be far too strict and thus unsound.	We recommend Policy DM25 is amended to include reference to 'Economic Development' rather than B Class Uses. If this is unacceptable to IBC, there should instead be the inclusion of a reference to acceptable non B Class uses on Employment sites for clarity and to ensure the policy is sufficiently flexible. We would recommend that a Car Showroom is included within this list of permitted uses for the reasons outlined above.
5287	Suffolk County Council (Mr Robert Feakes) [356]	DM25 - Protection of Employment Land	OBJECT	The County Council as Minerals and Waste Planning Authority considers the Ipswich Local Plan to be generally consistent with the Suffolk Minerals and Waste Plans. In order to support the provision of sustainable waste management facilities, e.g. Household Waste and Recycling Centres, amend DM25 to make it clear that, where compatible with adjacent uses, waste facilities can come forward on land allocated for employment. This amendment would better enable the delivery of employment-generating civic amenity sites, whilst still protecting other employment uses. Other policies, such as DM26, would ensure that sufficient weight is given to the protection of amenity.	DM25 should be amended as follows: '... and defined Employment Areas will be safeguarded for employment uses or similar sui generis employment uses.'
5350	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	DM25 - Protection of Employment Land	OBJECT	The policy potentially risks prejudicing the delivery of new retail and town centre floorspace in suitable locations. The Employment Areas defined on the policies maps and referenced in DM25 appear to be based on an out of date evidence base (Suffolk Haven Gateway Employment Land Review, October 2009). The Council must consider its stance in relation to the protection of employment sites in relation to the need for other uses. Retail and leisure capacity evidence demonstrates more sites are required. The Jewson site will be available for redevelopment in the plan period and should therefore be allocated to meet need.	Re-word sections of DM25 as follows: a. there is no reasonable prospect of the site being re-used for employment purposes over the plan period or there would be no adverse impact from its loss; ... Outside the defined Employment Areas, the change of use from B1, B2 or B8 to other uses may also be permissible if there is no reasonable prospect of the site being re-used for employment purposes over the plan period.
24218	EDF Energy Plc (Miss Nicola Forster) [248]	DM25 - Protection of Employment Land	SUPPORT	Support the amendment to this policy which now contains clearer guidance around the grounds upon which the Council will accept evidence that there is no reasonable prospect of the site being used for employment purposes. The approach accords with paragraphs 51 and 52 of the NPPF.	
5351	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	DM25/9.156	OBJECT	DM25 [and supporting text] potentially risks prejudicing the delivery of new retail and town centre floorspace in suitable locations. The Employment Areas defined on the policies maps/through DM25 appear to be based on an out of date evidence base (Suffolk Haven Gateway Employment Land Review, October 2009). The Council must consider its stance in relation to the protection of employment sites in relation to the need for other uses. Retail and leisure capacity evidence demonstrates more sites are required. The Jewson site will be available for redevelopment in the plan period and should therefore be allocated to meet need.	The loss of employment land, whether in existing employment use or allocated for employment, 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, leisure and housing. DELETE: As a general principle therefore, such land needs to be protected. Retail uses will not be permitted other than as small scale retailing ancillary to the main/B class use.

5292	Suffolk County Council (Mr Robert Feakes) [356]	DM28 - Protection of Open Spaces, Sport and Recreation Facilities	OBJECT	Policies CS5, CS16, CS20, DM5, DM17 and DM34 promote the development of the Rights of Way Network. Useful supporting text exists at paragraphs 8.63 and 9.99. However an amendment is required to protect the Public Rights of Way Network. Suggest amending DM28 by adding 'Rights of Way' to the title and add text at the end: 'Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made.'	Amend DM28 title to: Protection of Rights of Way, Open Spaces, Sport and Recreation Facilities. Add text to end of policy: Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made.
5534	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM29 - Provision of New Open Spaces, Sport and Recreation Facilities	OBJECT	Policy DM29 appears to make provision for new development to meet existing open space deficiencies. This would be contrary to Regulation 122 of the CIL Regulations. Paragraph two implies that the extent of provision within an area will inform the contributions sought from new development. This could be used to justify additional provision to meet existing deficiencies in the area. This does not accord with the law on this matter. Evidence to support the provisions of Appendix 6 should be published. Without it, the degree to which the Policy is evidence based and the most appropriate alternative is questioned.	Policy DM29 should be redrafted to make it clear that the provisions of Regulation 122 of the CIL Regulations will be upheld. Evidence to support changes to Appendix 6 should be published.
5215	Historic England (Mr Tom Gilbert-Wooldridge) [243]	DM30 - The Density of Residential Development	SUPPORT	It is not clear whether the density targets set out in this policy have been reviewed since the adoption of the Core Strategy to establish whether they remain appropriate. High densities may be acceptable in some locations, including in the town centre, but care needs to be taken to avoid harm to heritage assets through overly dense development. The SA notes uncertainties with regards to the impact of this policy on objective ET9. The policy helpfully sets out exceptions to the general approach, and specific site allocations should provide clarity with regards to detailed design issues.	
5535	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM30 - The Density of Residential Development	OBJECT	Policy DM30 is confused and contradictory in its requirements for density. Whilst clauses (a) to (c) seek to control densities, clauses (d) and (e) allow them to be overridden. Density should be informed by the principles set out in clause (d). Paragraphs 9.181 and 9.182 are aspirational and are in any case subject to the Housing Standards Review. Policy DM30 should be reviewed to ensure that it provides a reasonable basis for setting out the Council's expectations for the density of new development.	Policy DM30 should be reworded to provide a clear and consistent approach on development densities. Paragraphs 9.181 and 9.182 should be deleted.
5747	Private Individual	DM31 - The Natural Environment	OBJECT	The wildlife corridors as previously identified (just lines on a map) have been largely ignored. Wildlife corridors need resources to maintain, enhance and manage them over time. They need to have the right structure and be as wide as adjacent development will allow. In the past, once development starts, the existing wildlife corridor begins to deteriorate. They need a management plan.	
5291	Suffolk County Council (Mr Robert Feakes) [356]	DM31 - The Natural Environment	OBJECT	Policy DM31 appears to be a useful tool for applying the Framework's requirement to protect and enhance the natural environment. However, in order to be sound, the policy needs to refer to protected species in addition to Priority species, and 'priority species' rather than 'biodiversity action plan species' because there is no longer a national list of BAP species. An amendment is proposed to ensure that the plan is compliant with the legal duty set out by the Natural Environment and Rural Communities Act 2006. Reference should also be added to 'Biodiversity: Code of Practice for Planning and Development' (BS42020).	The following amendment is proposed to DM31: 'Development proposals should particularly seek to protect and enhance protected and priority species and habitats...' The County Council further recommends a minor amendment to the supporting text to make reference to new British Standard guidance - 'Biodiversity: Code of Practice for Planning and Development' (BS42020). This Guidance provides an excellent approach for dealing with the issues in this policy.
5149	Ipswich Wildlife Group (Mr Steve Pritchard) [1164]	DM31 - The Natural Environment	SUPPORT	Ipswich Wildlife Group agrees that the protection and enhancement of the natural environment in Ipswich is an important aspect of the overall life of the town. We think that the idea of the Ecological Network is an excellent one, and the plans set out for establishing it are very promising - we are already working with Greenways to promote the network in local communities. We are pleased to see that IBC will seek to conserve and enhance County Wildlife Sites and Local Wildlife Sites, in addition to the sites that have statutory protection (e.g. SSSIs, SPAs).	
5538	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM31 - The Natural Environment	OBJECT	Policy DM31 should be a criteria led policy, consistent with the provisions of paragraph 113 of the NPPF. The NPPF requires policies which protect ecology and landscape designation to be criteria based. This ensures that proposals for development can be adequately, transparently and objectively assessed against policy. Policy DM31 offers no such opportunity. In order to be consistent with national policy, DM31 should be redrafted to provide a criteria-led policy approach.	The policy should be redrafted to provide a criteria-led policy approach.

5199	The Theatres Trust (Planning Adviser) [278]	DM32 - Protection and Provision of Community Facilities	OBJECT	The Policy is unsound as it does not contain any policies that protect and enhance cultural facilities as guided in item 70 in the National Planning Policy Framework which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.	We recommend that: Policy DM32 is amended to include cultural facilities, as per the above definition; and/or Policy CS14 is amended to state that as well as encouraging new leisure, arts and cultural development, the loss or change of use of existing cultural facilities will be resisted, unless it can be demonstrated that there is no longer a community need or a replacement facility is provided in the immediate vicinity.
5201	The Theatres Trust (Planning Adviser) [278]	DM32 - Protection and Provision of Community Facilities	OBJECT	Regarding Paragraph 2 of the Policy, we suggest that the change of use of one community facility (eg a post office) to another community facility (eg a place of worship) would still have a significant impact on the community.	We'd recommend removing 'to non-community uses'.
24212	Planware Ltd (Donna Smith) [1223]	DM32 - Protection and Provision of Community Facilities	OBJECT	The requirement to demonstrate a facility is genuinely redundant is too vague. The 12 month marketing requirement is too long, 6 weeks would be more appropriate for a public house. No consideration has been given to the negative impact on the community, employment provision or sustainability through sites remaining redundant for 12 months. The policy is not consistent with the policy in the NPPF which states that planning should not act as an impediment to sustainable growth.	
5284	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	DM33 - Green Corridors	OBJECT	The designation of the green rim has no clear purpose or evidence base to support it. In the context where the plan is failing to both meet objectively assessed housing need and failing to make use of appropriate development opportunities within the Borough boundary the designation of a green rim is premature and prejudicial to the proper long term planning of the area.	Reference to the green rim should be removed.
5540	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	DM33 - Green Corridors	OBJECT	Policy DM33 is inconsistent with other plan policies which allocated land for development. The way in which green corridors within allocated development sites should be considered must be clarified through amendments to the Policy. The Key Diagram/DM33 provide a very broad definition of the location and width of green corridors. It is therefore unclear how development proposals will be assessed against the policy in the absence of any clear definition of the physical extent of the corridors. On sites such as the IGS, directly applying the provisions of DM33 would sterilise large swathes of the IGS from built development.	The policy should be reworded to provide a clearer explanation of the relationship between allocated development sites and green corridors.
5293	Suffolk County Council (Mr Robert Feakes) [356]	DM34 - Countryside	OBJECT	Policy DM34 refers to the Area of Outstanding Natural Beauty, in line with the requirements in the Framework. However, the policy does not explicitly deal with the impacts of development outside the AONB on the character and qualities of the AONB. Other locally protected landscapes, which exist outside the Borough boundaries but potentially within sight of new development are not referred to, which is not consistent with paragraph 109 of the Framework.	
5368	Gladman Developments (Mr Russell Spencer) [1437]	DM34 - Countryside	OBJECT	Concern is raised here that "development which would be relatively isolated in terms of access to public transport and community facilities should be avoided" but this is too restrictive and ignores the possibility of sites in these locations contributing to improving public transport connectivity and providing additional community facilities. The sustainability of such sites should be judged on a case-by-case basis through the planning balance exercise.	
5285	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	DM34 - Countryside	OBJECT	The designation of the green rim has no clear purpose or evidence base to support it, in the context of the plan failing to meet objectively assessed housing need and failing to make use of the appropriate development opportunities within the Borough boundary, the designation of a green rim is premature, and prejudicial to the proper long-term planning of the area.	Reference to the green rim should be removed
5513	Ipswich Liberal Democrats [1703]	DM34 - Countryside	OBJECT	Policy DM 34 says, "Avoid the loss of best and most versatile agricultural land where possible." I find this whole paragraph strongly hypocritical since the land allocated for the Northern Fringe is precisely within that category of best and most versatile agricultural land. Mainly Grade 2a.	

5565	Westerfield Parish Council (Mr Peter Miller) [235]	Chapter 10: Implementation	OBJECT	Westerfield Parish Council is concerned that little detail is given on how some of the necessary utility services will be implemented to show the services meet the requirement of both the development and do not have any permanent adverse affect on existing communities. The main services of concern are management of surface water drainage and foul waste. However, Westerfield Parish Council supports the inclusion of detailed infrastructure requirements and the trigger points for the Garden Suburb in the core strategy.	As part of the Infrastructure requirements for the Garden Suburb, more detail is needed on how foul waste will be handled. There needs to be a trigger in the infrastructure requirements for Anglian Water to produce a plan. At the moment it is not known if the existing system can be enhanced or if a new pipeline is required to cater for 3,500 additional houses. Key information should be put in the Supplementary Planning Document. Details should be known before any planning application is approved.
5391	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 10: Table 8A	OBJECT	There is no evidence of objectively assessed needs for freshwater and foul water infrastructure or to strategic solutions, and no listing in the infrastructure tables.	Key infrastructure deliverables for freshwater and foul water infrastructure should be listed in Table 8a. All transport infrastructure required to deliver the Core Strategy's targets should be identified, or the targets revised.
5693	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 10: Table 8A	OBJECT	SOCS endorse Northern Fringe Protection Group points. There is no evidence of objectively assessed needs for freshwater and foul water infrastructure or to strategic solutions, and no listing in the infrastructure tables.	Key infrastructure deliverables for freshwater and foul water infrastructure should be listed in Table 8a. All transport infrastructure required to deliver the Core Strategy's targets should be identified, or the targets revised.
5121	Lawson Planning Partnership Ltd (Mrs Aarti O'Leary) [241]	Chapter 10: Table 8B	OBJECT	NHS England (NHSE) objects to the inclusion of the health centre required to serve the proposed Garden Suburb as an infrastructure item to serve the southern neighbourhood only. The requirement for a new health centre is based on the overall growth to be accommodated within the Garden Suburb and, therefore, should be included as an item of strategic infrastructure. The omission of the health centre from the list of strategic infrastructure to serve the Garden Suburb is not 'positively prepared', 'justified', 'effective' or 'consistent with national planning policy' and, therefore cannot be considered 'sound'.	In order to be considered 'sound' Table 8 in Chapter 10 should be amended as follows: Strategic Infrastructure: Community Facilities - Health Centre - Serviced site within the southern neighbourhood District Centre to be transferred at time to be agreed. Phased contributions for capital costs of providing health centre to be secured throughout each stage of the development.
5279	Suffolk County Council (Mr Robert Feakes) [356]	Chapter 10: Table 8B	OBJECT	Table 8B refers to three 420-place primary schools. The County Council requires three 315-place primary schools as the minimum necessary resulting from the development. Experience of other large greenfield developments suggests that they generate greater demand for education places than existing housing. It is intended that land is provided such that the schools can be constructed with a larger (420-place) capacity, if monitoring of the number of children emanating from the development necessitates it. In the initial phases, the primary schools will not be constructed for more than 315 pupils each; this enables flexibility whilst meeting statutory requirements for proportionality.	
5407	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 10: Table 8B	OBJECT	Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later that 2021 or not at all this will adversely impact on the integrity of a European site. The Core Strategy fails to identify and plan for key strategic wastewater infrastructure. There is the possibility that a major new pipeline will be needed from the Garden Suburb to Cliff Quay.	A firm delivery date for the Country Park should be specified, or it should be delivered on a sequential basis as the Garden Suburb is developed. The Core Strategy should include a proper assessment of the need for strategic wastewater infrastructure based on the cumulative needs from homes and jobs growth and key infrastructure deliverables should be incorporated in table 8b.
5706	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 10: Table 8B	OBJECT	SOCS endorse the NFPG's points. Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later that 2021 or not at all this will adversely impact on the integrity of a European site. The Core Strategy fails to identify and plan for key strategic wastewater infrastructure. There is the possibility that a major new pipeline will be needed from the Garden Suburb to Cliff Quay.	A firm delivery date for the Country Park should be specified, or it should be delivered on a sequential basis as the Garden Suburb is developed. The Core Strategy should include a proper assessment of the need for strategic wastewater infrastructure based on the cumulative needs from homes and jobs growth and key infrastructure deliverables should be incorporated in table 8b.
5162	Ipswich Wildlife Group (Mr Steve Pritchard) [1164]	Chapter 10: Table 8B	OBJECT	Re: Country Park with joint visitor / community centre for Henley Gate. - Trigger point for delivery: Henley Gate is the last of the 3 areas to be developed and so up to 2000 houses might be in place before a single tree is planted in the Country Park. This would put pressure on other existing greenspaces, including the Stour and Orwell Estuaries SPA. We think that a start should be made on the Country Park as soon as the first house is started in the first area.	Work on the Country Park should begin at the start of the Green Suburb development, involving community organisations within an overall plan. As much public access as possible should be allowed from Day 1. Capital and maintenance contributions (or in-kind provision by the Henley Gate developer) and transfer of the remaining land will be secured prior to the occupation of 500 dwellings in Henley Gate.

5544	CBRE Global Investors on behalf of CBRE SPUK III (No. 45) Ltd (Mr Arwel Owen) [1450]	Chapter 10: Table 8B	OBJECT	The provisions set out in Table 8B are not justified by detailed evidence and does not provide an effective basis for implementation of the Plan over its plan period. Strategic infrastructure headings should be identified alongside mechanisms for delivery of those items, with detailed information about triggers agreed through the determination of planning applications, in accordance with paragraph 177 of the NPPF.	Table 8B should have detailed triggers removed, and instead should identify infrastructure headings, their role as strategic or neighbourhood infrastructure, and their respectively delivery mechanisms. An Infrastructure Delivery Plan should provide evidence base to support the Table.
5327	Crest Strategic Projects (Josephine Ritter) [1456]	Chapter 10: Table 8B	OBJECT	CS10 is supported by Table 8B, which sets out the detailed infrastructure requirements and trigger points for their delivery. There is no evidence available to demonstrate how the triggers have been arrived [at], and whether they represent an "appropriate stage" for delivery. The policy and Table 8B do not currently have due regard to the need for a "comprehensive approach" to the development of IGS as a whole. There are no effective mechanisms in place to ensure the delivery of infrastructure, which will compromise the deliverability of IGS as a whole. See Appendix 1 of full submission for detailed comments.	Seek further clarification as to how the triggers in Table 8B have been arrived at and whether they represent an appropriate stage for delivery.
5713	Private Individual	Chapter 10: Table 8B	OBJECT	It would appear that Ipswich Borough Council has omitted the necessary up-front details from the Core Strategy Plan as to how it intends to implement the infrastructure required for the development of the Ipswich Garden Suburb (Northern Fringe), including mitigation of impact due to:demands on clean water supply and demands on sewerage systems. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution fresh water and wastewater. Freshwater and wastewater infrastructure needs to be objectively assessed and key infrastructure listed in the CS.	
5473	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Objective 3	OBJECT	ONS migration data used by the Council only extends to 2010/11, the latest ONS forecast shows no net migration from 2012-2031 for Ipswich. DCLG's February 2015 household projections suggest a need for 10,434 new homes. The baseline household figure used is too high. The Viability Report indicates 28% affordable housing for the Garden Suburb, the affordable housing target should not compromise delivery of other infrastructure. It is not clear whether the jobs target relates to Ipswich or the Ipswich Policy Area. How will jobs growth be measured? A higher population has been used to estimate jobs growth than population growth.	There should be clear and specific objectives for homes and jobs growth for the Borough of Ipswich. Additional objectives can be specified for outside the Borough and in relation to the IPA but these should not be used to blur the former and it is not clear how the data will be obtained. 'In the region' of is not specific and a specific target (greater than x with a stretch target of y) should replace this phrase. Targets for homes and jobs growth need to be in balance. Targets should be revised in line with the latest ONS data. For jobs, the Business Register and Employment Survey should be specified. If jobs are to be created outside of the Borough the Core Strategy should include an indicator to measure this.
5474	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Objective 6	OBJECT	The CS relies heavily on a transport modal shift from cars to more sustainable modes such as walking, cycling and public transport. This will be challenging and it is suggested that an additional indicator of the Census travel mode to work data be included to improve soundness.	Add an additional indicator of the Census travel mode to work data be included to improve soundness.
5216	Historic England (Mr Tom Gilbert-Wooldridge) [243]	Objective 8	OBJECT	The indicators and targets for Objective 8 should be improved with regards to the historic environment. Reference to buildings at risk is welcomed, but the national register now covers all designated heritage assets on a Heritage at Risk (HAR) Register. There should be a related target to this indicator stating that the number of assets on the HAR Register should be reduced. Other indicators/targets could include the number of up-to-date conservation area appraisals and management plans, and/or the number of planning decisions made in accordance with officer / English Heritage advice.	In order to make the plan sound, the second indicator should refer to the number of heritage assets on the Heritage at Risk Register as well as the local Building at Risk Register, with a target to reduce the number of heritage assets at risk for positive reasons. We also suggest further indicators and targets as above.
5462	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Objective 10	OBJECT	The target is very unambitious. Low income is a key factor in deprivation but is not included as an indicator. The Core Strategy needs to be more effective in tackling this issue.	Include average wages and the rank of Ipswich in the Indices of Multiple Deprivation as indicators. More ambitious and specific time related targets for continuously improving the latter should be used.
5475	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Objective 12	OBJECT	The proposed indicator is vague and gives no measure of beneficial outcomes from working together on jobs growth, housing growth or strategic infrastructure.	Indicators should include joint topic papers, work programmes and definable outcomes relating to jobs growth, housing growth and strategic infrastructure. The target should be more specific but as a minimum should be 'to achieve effective cross boundary working on housing growth, jobs creation and strategic cross boundary infrastructure including green space.'

5270	Suffolk County Council (Mr Robert Feakes) [356]	Appendix 5 - Activities or services relevant to each Planning Standard Charge Heading	OBJECT	Appendix 5 refers to a list of infrastructure to be 'included in the standard charge'. It is assumed that this list is not intended as a precursor to a Community Infrastructure Levy Regulation 123 List; this should be made clear through an amendment to the supporting text. Whilst the County Council agrees that development should be expected to fund each of these types of infrastructure (where consistent with relevant tests), the County Council would not support each of these types of infrastructure being funded under the Community Infrastructure Levy (rather than through the Section 106 regime).
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Proposed Submission Core Strategy and Policies Development Plan Document Review (Proforma Numbers)

REPRESENTATIONS	POLICY	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED
777	4.4	OBJECT	IBC has not demonstrated that it has effectively worked with neighbouring Authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill and consequently the CS should not be adopted. IBC needs to demonstrate that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council. IBC needs to explain in the CS how this strategic purchase aligns with employment and housing growth strategies and targets [to focus new employment within the town centre].	IBC needs to explain in the CS how the strategic purchase of the old sugar beet factory site aligns with employment and housing growth strategies and targets.
22	4.4	OBJECT	IBC needs to demonstrate that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council. IBC needs to explain in the CS how this strategic purchase aligns with employment and housing growth strategies and targets [to focus new employment within the town centre].	IBC needs to explain in the CS how the strategic purchase of the former sugar beet factory site aligns with employment and housing growth strategies and targets.
43	4.4	OBJECT	IBC has not demonstrated that it has effectively worked with neighbouring authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill and consequently the CS should not be adopted.	
87	6.8 The Objectives 3:	OBJECT	The jobs and homes figures are not justified. Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside it. Measurement indicators are needed. The housing target is so poorly defined as to be ineffective. A specific, realistic and measurable housing growth target is required for Ipswich Borough, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.	Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed. A specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.
28	6.8 The Objectives 3:	OBJECT	Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed.	Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed.
187	6.8 The Objectives 3:	OBJECT	Where will 12,500 jobs come from? There is no need for 13,500 homes and this number is not desirable.	
19	6.8 The Objectives 3:	OBJECT	Where will 12,500 jobs come from?	
6	6.8 The Objectives 3:	OBJECT	There is no need for 13,500 homes and this number is not desirable.	
1	6.8 The Objectives 3:	OBJECT	There is no need for 13,500 homes and this number is not desirable (Objective 3a). Where will 12,500 jobs come from (Objective 3b)?	
4	6.8 The Objectives 3:	OBJECT	The housing target is so poorly defined as to be ineffective. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.	A specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.
684	6.8 The Objectives 3:	OBJECT	Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed. The housing target is so poorly defined as to be ineffective. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.	Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed. A specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.
271	CS1: Sustainable Development - Climate Change	OBJECT	The plan will not protect our health or deal with air pollution. National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	
1	CS1: Sustainable Development - Climate Change	OBJECT	The plan will not protect our health or deal with air pollution. National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development. Local residents feel that there will be adverse effects and that their views are not being listened to.	

15	CS1: Sustainable Development - Climate Change	OBJECT	The plan will not protect our health or deal with air pollution	
1	CS1: Sustainable Development - Climate Change	SUPPORT	The plan will protect our health or deal with air pollution. National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will deliver sustainable development.	
783	CS2: The Location and Nature of Development	OBJECT	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.	A target should be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.
303	CS5: Improving Accessibility	OBJECT	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy.	
1	CS7: The Amount of Housing Required	SUPPORT	There is a need for 13,500 homes and this number is desirable.	
722	CS7: The Amount of Housing Required	OBJECT	The Council's population forecast should not be based on a high immigration scenario, which is inconsistent with the policies of all the main political parties.	
212	CS7: The Amount of Housing Required	OBJECT	Object to the requirement for 13,500 homes - they are not needed and this number is not desirable. It requires a big increase on current building levels and those since 2008.	
83	CS7: The Amount of Housing Required	OBJECT	The Council's population forecast should not be based on a high immigration scenario, which is inconsistent with the policies of all the main political parties. Object to the requirement for 13,500 homes - they are not needed and this number is not desirable. It requires a big increase on current building levels and those since 2008.	
28	CS10: Ipswich Garden Suburb	OBJECT	The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not harm the integrity of a European designated habitat. CS10 and table 8B need to be revised.	
213	CS10: Ipswich Garden Suburb	OBJECT	The plan allocates the whole of the Garden Suburb for approximately 3,500 new dwellings, plus 10,000 homes in other parts of Ipswich. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	
723	CS10: Ipswich Garden Suburb	OBJECT	It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time.' IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, residents will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	
81	CS10: Ipswich Garden Suburb	OBJECT	It's unsound to allocate the entire Northern Fringe when its delivery may not be viable over plan timescales. How will infrastructure be provided? The CS should be based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not harm a European designated habitat. Allowing multi-site starts will result in severe congestion and damage the attractiveness and prosperity of Ipswich. With few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites.	
205	CS13: Planning for Jobs Growth	OBJECT	The jobs target of in the region of 12,500 jobs is unrealistic and undeliverable as to date there has been no real job growth since 2001 and public sector jobs are set to reduce. This is unsustainable and not compliant with the National Planning Policy Framework (NPPF).	

707	CS13: Planning for Jobs Growth	OBJECT	A recent report by Peter Brett Associates (listed on the IBC website) calls into question the viability of developing new offices, industrial units, warehousing and large retail offerings with Ipswich. This challenges the ability of the CS to deliver the massive jobs growth target. For soundness the CS needs to address the severe obstacle to growth identified and produce a specific and realistic jobs target for the Borough of Ipswich.	The Core Strategy needs a specific and realistic jobs target for the Borough of Ipswich.
83	CS13: Planning for Jobs Growth	OBJECT	A report by Peter Brett Associates calls into question the viability of developing new offices, industrial units, warehousing and large retail offerings with Ipswich. This challenges the ability of the CS to deliver the massive jobs growth target. For soundness the CS needs to address the severe obstacle to growth identified and produce a specific and realistic jobs target for the Borough of Ipswich. The jobs target of in the region of 12,500 jobs is unrealistic and undeliverable. This is unsustainable and not compliant with the National Planning Policy Framework (NPPF).	The Core Strategy needs a specific and realistic jobs target for the Borough of Ipswich.
4	CS14: Retail Development and Main Town Centre Uses	SUPPORT	This will be achievable and will make Ipswich a better place.	
278	CS14: Retail Development and Main Town Centre Uses	OBJECT	This will not be achievable and will not make Ipswich a better place.	
83	CS17: Delivering Infrastructure	OBJECT	Traffic congestion is a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Hospitals, schools and access to GPs and social care are currently inadequate, how will they and other infrastructure and services e.g. drainage cope with growth? Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation can be implemented. Fresh/waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	
731	CS17: Delivering Infrastructure	OBJECT	Traffic congestion is a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. The plan will not be effective and is unsound. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation can be implemented. Fresh/waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified. There is a lack of sewage pipeline capacity between the Garden Suburb and Cliff Quay treatment works.	
218	CS17: Delivering Infrastructure	OBJECT	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Hospitals, schools and access to GPs and social care are currently inadequate, how will they cope with growth? Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area, development will not improve matters.	
220	CS20: Key Transport Proposals	OBJECT	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy.	
731	CS20: Key Transport Proposals	OBJECT	Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. As such the plan will not be effective and is unsound. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation methods can be implemented. Freshwater and waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	
83	CS20: Key Transport Proposals	OBJECT	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation methods can be implemented. Freshwater and waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	
1	CS20: Key Transport Proposals	OBJECT	Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic. the lack of access between the Northern Fringe area and major trunk routes (A14 in particular) without having to travel via/near Ipswich town centre, further adding to congestion - the Core Strategy only indicates that a northern bypass or link road investigation be "encouraged" by key partners.	

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CS20: Key Transport
Proposals

OBJECT

Traffic congestion has always been a key concern. Plan fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Updated traffic and air quality modelling should be undertaken and development not permitted unless effective mitigation methods can be implemented. Freshwater and waste water infrastructure needs to be objectively assessed and key infrastructure listed. Risks to delivery should be identified. Following the introduction of the computer based traffic light control system, traffic is worse than ever. Difficulties are experienced in Valley Road and Henley Road and the pedestrian crossing is dangerous.

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2.1

OBJECT

The Localism Act - local people are not being listened to.

Proposed Submission Supporting Documents

REP ID	RESPONDENT NAME	DOCUMENT	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED
5433	Boyer Planning (Mr Matt Clarke) [293]	Ipswich Local Plan Policies Map Nov 2014 (Amended 07/01/2015)	OBJECT	The East of England Co-operative Society supports the definition of this boundary insofar as it relates to the Rosehill Centre and associated land that it owns. It is considered that this represents a broadly logical reflection of the recent consent (IP/14/00080/FUL) and the valuable role that all of this land plays in supporting the District Centre in line with policies directing retail uses to such centres.	
5294	Suffolk County Council (Mr Robert Feakes) [356]	Plan 2 Flood Risk	SUPPORT	The Strategic Flood Risk Assessment appears appropriate. Additional comments are provided in relation to the surface water management implications of the Site Allocations document.	
5482	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Proposed Submission Core Strategy - Appropriate Assessment	OBJECT	The Appropriate Assessment ignores the change in Table 8B which states that completion of initial works at the Country Park is dependent on the occupation of 500 dwellings at Henley Gate. If fewer houses are developed or Henley Gate does not come forward in a timely manner there is no mechanism to secure delivery of the Country Park. The Habitats Regulations Assessment submitted for the CBRE planning application states that the Country Park should be in place in advance of occupation of the first dwelling.	The Appropriate Assessment needs to be revised to take account of the change to Table 8B.
5724	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Proposed Submission Core Strategy - Appropriate Assessment	OBJECT	SOCs endorse the Northern Fringe Protection Group's points. The Appropriate Assessment ignores the change in Table 8B which states that completion of initial works at the Country Park is dependent on the occupation of 500 dwellings at Henley Gate. If fewer houses are developed or Henley Gate does not come forward in a timely manner there is no mechanism to secure delivery of the Country Park. The Habitats Regulations Assessment submitted for the CBRE planning application states that the Country Park should be in place in advance of occupation of the first dwelling.	The Appropriate Assessment needs to be revised to take account of the change to Table 8B.
5618	Natural England (Mr John Jackson) [1413]	Proposed Submission Core Strategy - Appropriate Assessment	OBJECT	Further to our earlier comments, we are satisfied that the Appropriate Assessment for the Core Strategy now addresses our concerns in relation to increases in visitors to Orwell Country Park and Pond Hall Farm. IBC has also committed to carrying out a study into visitor use and bird disturbance around Bridge Wood and Pond Hall, which will provide a baseline and will be used to inform visitor management measures at the park. Where necessary we would expect individual developments to be subject to project level Habitats Regulations Assessment linking back to elements of mitigation identified at the strategic level.	Where necessary we would expect individual developments to be subject to project level Habitats Regulations Assessment linking back to elements of mitigation identified at the strategic level.
5342	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Ipswich Local Plan Policies Map Nov 2014 (Amended 07/01/2015)	OBJECT	Whilst we accept that meeting the full housing requirement is highly likely to necessitate joint working with neighbouring areas, it is incumbent on Ipswich Borough Council to make best use of land within its own boundary first before it relies on assistance from others. The evidence base, in the form of the SHLAA, shows that it has not done that, because the SHLAA identifies additional opportunities within the Borough boundary, including my client's land, which has previously been tested through and found to be suitable for housing.	In accordance with our representations to the Core Strategy Review, there is a need to allocate additional strategic sites for the last part of the Plan period (2026-2031) or identify deliverable broad locations. In that context, land at North-East Ipswich should be identified on the Key Diagram and Site Allocations Proposals Map as a growth location or strategic site for post 2026 development.

Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED
5485	Northern Fringe Protection Group (Mr Brian Samuel) [976]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	Table 3-2 fails to use the most recent baseline data. Suggested improvements to the objectives and indicators in Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.
5498	Northern Fringe Protection Group (Mr Brian Samuel) [976]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	The SA underestimates the impact of Objective ER3. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.	
5609	Save Our Country Spaces (Mrs Barbara Robinson) [978]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	SOCS commented previously (September 2014) in response to IBC's updated SA scoping consultation letter. SOCS feel the responses given to key issues in the letter sent do not address these key issues [the need to incorporate an updated evidence base and give more detailed consideration to alternative spatial options] sufficiently. SOCS reserve the right to continue to question the "evidence base".	
5730	Save Our Country Spaces (Mrs Barbara Robinson) [978]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA underestimates the impact of Objective ER3. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.	
5494	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.1 The Vision	OBJECT	The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	The jobs target needs to be re-appraised.
5728	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.1 The Vision	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	The jobs target needs to be re-appraised.
5499	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies	OBJECT	Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	A wider range of alternatives should be considered including a jobs led strategy, locating homes nearer to new employment sites, co-operating more closely with neighbouring authorities and delivering jobs and homes on the Sugar Beet Factory site.

5731	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	A wider range of alternatives should be considered including a jobs led strategy, locating homes nearer to new employment sites, co-operating more closely with neighbouring authorities and delivering jobs and homes on the Sugar Beet Factory site.
5486	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.1	OBJECT	Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.
5727	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.1	OBJECT	Endorse NFPG points. Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.
5501	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.2	OBJECT	Joint evidence base documents for the Ipswich Policy Area have not been made available. Jobs targets for the four Ipswich Policy Area authorities are 26% higher than the January 2015 EEFM forecasts and are therefore at risk of being unrealistic. Evidence needs to be provided that the jobs targets will provide sustainability benefits and that the Core Strategies of neighbouring authorities take account of the need to deliver 4,000 extra homes and that the sustainability effects have been assessed. If the jobs target is sustainable why do jobs and homes need to be provided in other authority areas.	
5612	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.2	OBJECT	The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the new SA. This can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work. This approach is required under the Duty to Co-operate.	

5481	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.3	OBJECT	SA should assess effects of 13,550 homes against evidence illustrating 10,434 are needed. SA should consider effects of multiple starts at the Garden Suburb. Conclusions of CBRE traffic assessment should be considered. SA should assess implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling. The effect on redevelopment through removal of the brownfield land target and multiple starts at the Garden Suburb should be assessed.	the SA needs to assess the effects of delivering 13,550 homes when evidence suggests this should be 10,434. The SA should take account of the change to Table 8B. The SA should recognise the effects identified through the transport assessment submitted with the CBRE application. The removal of the brownfield land target should be better considered in the SA.
5613	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.3	OBJECT	The adopted CS allows for a phased approach to development of the NF. Its SA judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the NF without locational restrictions. A detailed examination of the implications of this change must be included in the new SA and a full critique of the rationale. Multiple starts may pose the risk that if a developer/landowner hits financial problems, the added burden [of infrastructure provision] falls on remaining landowners/developers, making their operation unviable and halting delivery, resulting in blight. Grampian Conditions are not mentioned within the Scoping report.	A "safety net fund" needs to be arranged and established as mitigation, - reserve matters? - or perhaps Grampian Conditions with front loaded finance ahead of any planning permission being granted and started.
5597	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.3	OBJECT	SA is not fit for purpose. The adopted CS allows a phased approach to development of the Northern Fringe/IGS and its SA judged multiple starts as unsustainable. The revised CS now allows multi-site development across the NF. A detailed examination of the implications must be included in the new SA and a full critique of the rationale behind the proposed changes. With multiple starts, if one developer hits financial problems, the added burden on remaining developers may make their operation unviable and halt delivery. This would blight the land. What contingency is there if market forces impact on infrastructure delivery?	A "safety net fund" needs to be arranged and established as mitigation or Grampian conditions with front loaded finance ahead of planning permission being granted and started. The Hyder Scoping Report does not mention Grampian Conditions.
5495	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.4	OBJECT	The SA needs to take account of the outputs from the Viability Testing for Ipswich Borough Council report which questions the viability of office, industrial and warehouse development. The jobs figure is based on over-estimated population growth, the SA should take this into account. The viability study challenges the viability of the Westgate site and the SA has not acknowledged this. The SA should recommend measures to improve the retail offer and deliver new jobs. The SA should assess the impact of developing the Sugar Beet Factory site on the delivery of the Core Strategy.	The SA should consider the conclusions of the viability report, assess the implications of the purchase of the Sugar Beet Factory site and recommend measures to improve retail and jobs delivery.
5611	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.4	OBJECT	SOCS argued [previously] that IBC's Core Strategy was unsustainable as it was based on unrealistic job targets. The previous SA failed to recognise these concerns. Evidence now shows that the jobs target was unsustainable and the original SA incorrectly assessed the CS as sustainable. A more evidence-based approach to SA is required. We are disappointed that IBC has ditched the employment-led strategy in favour of a housing-led approach. There has been no assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy. The SA needs to consider the implications of this key change.	

5502	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.6	OBJECT	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.
5732	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.6	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.
5503	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.7	OBJECT	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.
5496	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.7	OBJECT	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.
5729	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.
5733	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.

5504	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.2	OBJECT	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.
5734	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.2	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.
5505	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.4	OBJECT	Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.
5735	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.4	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.
5506	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.6	OBJECT	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modelling needs to be updated.	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas and recognise that the employment target relates to the Ipswich Policy Area.
5736	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.6	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modelling needs to be updated.	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas and recognise that the employment target relates to the Ipswich Policy Area.
5507	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.7	OBJECT	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.

5737	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.
5508	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.8	OBJECT	The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.
5738	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.8	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.
5480	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Appendix B - Baseline Data	OBJECT	The best available data has not been used. More recent data on air quality, average weekly wages, sports/open space provision, population and employment is available. Data showing changes in the number of jobs over the years should be included. The most recent DCLG, ONS and EEFM forecasts should be included. The Trend Migration scenario is flawed.	
5610	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Appendix B - Baseline Data	OBJECT	Regarding Air Quality and air Pollution impacts, the SA is totally lacking in capacity to reflect the current situation regarding lack of resource; eg lack of data and continuous monitoring within Ipswich from traffic, lack of particulate impacts; lack of progress in responding to emerging health impacts from Air pollution; lack of work and remit within the SA for Cumulative and compound impacts for Ipswich from multiple sources of air pollution ie Industrial, biomass, clinical and traffic and also from the crematorium. Also from "chem trails" from overhead aircraft. All in combination from impacts from Europe impacting Ipswich adversely.	
5484	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Appendix C - Consultation Comments	OBJECT	Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.
5726	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Appendix C - Consultation Comments	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.

5483	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.	
24075	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	The manner of "last minute", poorly drafted "revisions" to the Executive paper on the 15th October [2013] on CS10 were unacceptable, and in breach of protocols and SCI. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the public interest. The revisions make a fundamental change in direction that has "seriously undesirable unintended consequences" which should be properly referenced, appraised and evaluated within the SA. The CS10 changes are not properly referenced nor track-changed within the SASR.	
5725	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.	
5620	Natural England (Mr John Jackson) [1413]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	Natural England is reasonably satisfied that the Sustainability Appraisal considers the impacts of the Core Strategy and Policies on relevant aspects of the environment within our remit, including biodiversity and geology, landscape, green infrastructure and soils. We particularly welcome SA objectives to protect and enhance designated sites, including SSSIs, SACs, SPAs and Ramsar sites, in addition to locally designated and non-designated areas of biodiversity. However, we would advise that the SA should cross-reference with the findings and recommendations of the Appropriate Assessment which identifies potential recreational disturbance effects on European sites and measures to mitigate these.	
5500	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 5: CUMMULATIVE EFFECTS	OBJECT	The SA does not take account of the cumulative effects of Core Strategies in neighbouring authority areas regarding housing, employment, traffic/transport and air quality. There is no evidence of any strategic policy outcomes from the Ipswich Policy Area. The jobs targets of the four local authority areas within the Ipswich Policy Area are 26% higher than the total January 2015 EEFM forecast and there is a risk that the jobs targets are unrealistic.	The cumulative effects of neighbouring authority's plans need to be assessed. The SA should take account of any effects from the IPA Board.

5594	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 5: CUMMULATIVE EFFECTS	OBJECT	Likely predicted Climatic Change and adverse climatic weather impacts are insufficiently addressed with insufficient work on Compound and Cumulative Impacts likely, especially from the Suffolk Coastal District growth and expansion plans. A Joint Environmental Impact Assessment of the Core Strategy is needed for the whole of the Ipswich Policy Area. An isolated EIA on the Northern Fringe would provide no necessary safeguards for public health. Hyder's SA does not address the issues we suggest. (see Appendix E [of full submission] - SOCS 2 Sept 2014 SA Scoping Update Consultation).
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