

# **Ipswich Local Plan**

## **Proposed Submission Core Strategy and Policies Development Plan Document Review**

### **Statement of Consultation Pre-Submission Main Modifications December 2015**

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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. The Core Strategy and Policies DPD Review – Statement of Consultation – Proposed Submission (September 2015) covers points (v) and (vi) above. This Consultation Statement details the consultation undertaken in relation to the Pre-Submission Main Modifications.
- 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 should 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 19<sup>th</sup> November 2014 and consultation took place between 12<sup>th</sup> December 2014 and 5<sup>th</sup> 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.
- 2.5 Proposed Submission consultation was undertaken between 12<sup>th</sup> December 2014 and 5<sup>th</sup> March 2015. The consultation was carried out in accordance with the March 2014 SCI as detailed in the Core Strategy and Policies DPD Review – Statement of Consultation – Proposed Submission (September 2015).

### **3 Pre-Submission Main Modifications consultation**

- 3.1 The Pre-Submission Main Modifications consultation is not a formal required stage of the Local Plan preparation process. However, due to a number of changes to national policy the Council decided to propose modifications and provide people with the chance to comment on these prior to the plan being submitted. An addendum to the Proposed Submission Sustainability Appraisal report and an addendum to the Proposed Submission Habitats Regulations Assessment were also produced for consultation. This also provided an opportunity to address comments received at the Proposed Submission consultation where the Council considered main modifications would be appropriate to address these.
- 3.2 A six week consultation took place between 9<sup>th</sup> October 2015 and 23<sup>rd</sup> November 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; and
  - Holding a drop-in event at the Town Hall on Saturday 7<sup>th</sup> November.
- 3.3 Extra effort was taken to ensure, through the written material, that people were aware that comments were only being invited on the main modifications at this stage. A total of 19 people attended the exhibition.

3.4 Representations on the Pre-Submission Main Modifications consultation for the Core Strategy and Policies development plan document review were received from a total of 28 individuals and organisations amounting to a total of 72 representations. A further 4 comments were made in relation to the Sustainability Appraisal addendum and a further 1 comment was made in relation to the Habitats Regulations Assessment addendum.

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

- In relation to the proposed Ipswich Garden Suburb there is concern from a number of previous respondents that previous comments have not been taken into account. Objections remain in relation the impact of the development in terms of traffic, air quality and the provision of infrastructure;
- Concern that the housing figures do not assess the most recent data on housing need;
- Objections to the requirements for energy efficiency in that they are contrary to national policy;
- Objections to the requirements for accessible dwellings and the space standards as these are not evidenced;
- Historic England support many of the changes in relation to historic assets but require further changes to DM8;
- Natural England consider that reference to the Habitats Regulations Assessment mitigation strategy should be included in CS17 and there should be a commitment to producing the strategy, however they are supportive of requirements for developer contributions;
- Suffolk County Council support changes relating to the biodiversity duty, the requirement for accessible dwellings, amendments relating to archaeology, parking standards;
- Natural England and Suffolk County Council support the amendments relating to the AONB;
- Obstacles to economic growth have not been addressed and no consideration has been given to the potential impact of the sugar beet site purchase on the town centre;
- Support from Crest Strategic Projects for changes to CS10;
- The criteria for gypsy and traveller sites does not reflect national policy;
- Support from Sport England to provide for indoor as well as outdoor sports facilities.

Some of the issues above do not relate directly to the pre-submission main modifications but have been logged as they relate to how the Council has addressed comments raised previously.

## **4 Conclusion**

4.1 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 consultation statements, 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. The Council has greatly valued the input received from all respondents.

4.2 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 the Pre-Submission Main Modifications to the Proposed Submission Core Strategy and Policies development plan document review (December 2014 – March 2015)**

Note to summary of representations on proposed Pre-Submission Main Modifications

Please note that 43 people who made representations at the earlier Regulation 19 stage were not notified of the public consultation on the Pre Submission Main Modifications by e-mail, due to a technical omission. Therefore the Council has extended the public consultation for these 43 people until 21<sup>st</sup> December 2015. The Council will submit any representations received from these 43 people as soon as possible after this date, together with summaries of the representations.

Rep ID	Respondent	Modification	Support / Object	Comments	Change to Plan requested
24288	Save Our Country Spaces	Whole Document	Object	Paragraph 3.4 of the Statement of Consultation does not accurately capture the issues raised, including the lack of effective policies and outcomes from the Duty to Co-operate. Concerned that the genuine concerns and issues raised by the public have been disregarded. Modifications do not reflect evidence of case law relating to congestion, air quality and affordable homes. The objectives can be categorised as muddled and sometimes in conflict, not measured and only aspirations. SOCS have no confidence the modifications will lead to 'more genuinely sustainable development or growth' (8.5). Balance between housing and jobs is not aligned (8.9).	
24302	Northern Fringe Protection Group	Whole Document	Object	Paragraph 3.4 of the Statement of Consultation does not accurately capture the issues raised, including the lack of effective policies and outcomes from the Duty to Co-operate. Concerned that the genuine concerns and issues raised by the public have been disregarded.	
24264	Save Our Country Spaces	1. CS1	Object	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. Climate change remains unaddressed and multi start development at the Northern Fringe is more likely to exacerbate flood risk and compromise CS4.	
24307	Marine Management Organisation	1.CS2	Support	Marine plans apply up to the mean high water springs mark, which includes the tidal extent of any rivers. Marine plans guide decision makers on development in marine and coastal areas. In 2014 the East Inshore and Offshore marine plans for the area north of Felixstowe were published, becoming a material consideration for public authorities. The	



				MMO is currently developing marine plans for the South Inshore and Offshore Plan Areas. Where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on planning that involves coastline or tidal river.	
24230	Crest Strategic Projects	2. CS2	Support	Emerging Policy CS2: The Location and Nature of Development - We support the amendment to the wording of Policy CS2 which removes the requirement to provide suitable infrastructure 'prior' to the delivery of the IGS. This reflects Table 8B in Chapter 10 of the Proposed Submission Core Strategy, which sets out trigger points for the delivery of items of infrastructure (this table is not proposed to be modified).	
24292	Save Our Country Spaces	2. CS2	Object	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. The CS2 modification to accelerate and allocate the Northern Fringe in its entirety will not improve accessibility.	
24219	Historic England	4. CS4	Support	<p>We welcome the proposed main modification to Policy CS4, which largely addresses our concerns with the Proposed Submission draft. Although the additional wording to the third sentence does not fully reflect our suggested wording, the modification does enough to overcome our concerns. Amending 'historical' to 'heritage' in the first sentence is also welcomed.</p> <p>While it does not form part of the current public consultation, we note and welcome the additional modifications to paragraphs 8.46, 8.53 and 8.55.</p>	
24243	Suffolk County Council	4. CS4	Support	CS4 - The County Council supports this amendment, which will help ensure compliance with the biodiversity duty as set out in the Natural	

				Environment and Rural Communities Act 2006. It improves the soundness of the proposed policy through stronger legal compliance and a more effective response to the requirements of paragraph 109 of the National Planning Policy Framework.	
24293	Save Our Country Spaces	4. CS4	Object	The Greenways Project never had any input on CS10 area. There is omission on the data (SPD) which exists for NF and IGS. The modifications are more likely to compromise CS4. CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable.	
24280	Private Individual	7. CS7	Object	The assessment of housing need does not reflect the most recent information.	
24283	Private Individual	7. CS7	Object	The assessment of housing need does not reflect the most recent information.	
24286	Private Individual	7. CS7	Object	<p>No evidence of compliance with the Localism Bill on effective policies and co-operation with adjacent Authorities on jobs and housing where you ignore up-to-date evidence on housing assessment.</p> <p>Fail to take into account how financial investment in the sugar beet site will have on future jobs and homes in Ipswich. How the development of brownfield sites such as the former Volvo site, owned by the Council, and the 10acre nearby site owned by another, both immediately available for residential use, without negative input on employment. Both can be developed, without the need for redesigned roads, sewerage systems or cost to the Council.</p>	
24289	Save Our Country	7. CS7	Object	Paragraph 3.4 of the Statement of Consultation does not accurately capture all of the issues raised.	

	Spaces			This includes issues raised in relation to the assessment of housing not being updated to reflect the most recent information available including the DCLG Household Projections 27th February 2015 and the ONS migration data. Concerned that the genuine concerns and issues raised by the public have been disregarded. CS7 will fail if the balance between jobs growth and housing are not aligned.	
24303	Northern Fringe Protection Group	7. CS7	Object	Paragraph 3.4 of the Statement of Consultation does not accurately capture all of the issues raised. This includes issues raised in relation to the assessment of housing not being updated to reflect the most recent information available including the DCLG Household Projections 27th February 2015 and the ONS migration data. Concerned that the genuine concerns and issues raised by the public have been disregarded.	
24253	Private Individual	9. CS10	Object	<p>Writing to let you know that myself and family strongly object to the Northern Fringe proposal and of disgust at the way IBC has completely failed to address the substantial number of key issues raised during previous consultation, without offering any explanation.</p> <p>The Northern Fringe is currently one of the most beautiful open spaces within easy reach of Ipswich. To develop it will be to spoil it beyond repair and deny thousands of residents easy access to the countryside.</p> <p>Believe that the environmental consequences (including traffic, sewage and lack of natural space) of damaging this area will be extremely negative.</p>	

24255	Private Individual	9. CS10	Object	<p>Disappointed that the documents fail to address the main concerns raised on the previous proposals; which were on the need and cost of basic infrastructure.</p> <p>The existing road network is close to maximum capacity. Only solution is for a northern bypass. This would also overcome difficulties with the Orwell Bridge.</p> <p>Ignoring problems associated with site drainage will place additional burdens on residents, and cause chaos on the route needed for new drainage. The viability and sustainability of this development should be reassessed, especially given the lack of effort to co-ordinate with neighbouring authorities on matters such as housing and jobs.</p>	
24256	Private Individual	9. CS10	Object	<p>It appears that we are going over old ground. Issues that were raised in previous consultations have not been addressed. Without addressing these issues this area could be turned into a 'tip' to live in - unhealthy, noisy, dangerous.</p> <p>The traffic in the north of Ipswich regularly at peak times is at maximum. Before any more houses are built, a north bypass is needed. Will also solve air quality problems.</p> <p>The sewage problem need to be addressed before any houses are built. More local jobs are also needed.</p>	
24263	Save Our Country Spaces	9. CS10	Object	<p>Statement of Consultation doesn't accurately capture issues raised, including uncertainty over deliverability of allocating the entire Northern Fringe</p>	

				<p>due to traffic congestion, air quality impacts and lack of sewage infrastructure. Failure to address cumulative needs for infrastructure including roads, sewage and health/social care.</p> <p>Allocating in entirety may exacerbate flooding - should be shown on Map 2. High risk strategy, should be phased. Appendix 5 should reflect issues. Impacts of public sector job losses, income:house price ratios, impacts on Suffolk Coastal villages, Housing and Planning Bill, real reasons for pre-submission main modifications, current planning application and alternatives also should be considered.</p>	
24272	Private Individual	9. CS10	Object	<p>We are very disappointed to learn that our key issues raised in our previous letters appear to have been totally ignored. No explanation has been put forward as to why 1090 letters from local people have been ignored, raising a total of 9325 submissions. We can only assume that the scheme is to be 'steam rolled' through at any cost regardless of anyone's opinions. By totally ignoring public concerns, sadly our confidence in local democracy has fallen to zero.</p>	
24273	Private Individual	9. CS10	Object	<p>We are very disappointed to learn that our key issues raised in our previous letters appear to have been totally ignored. No explanation has been put forward as to why 1090 letters have been ignored, raising a total of 9325 submissions. We can only assume that the scheme is to be 'steam rolled' through at any cost regardless of anyone's opinions. By totally ignoring public concerns, sadly our confidence in local democracy has fallen to zero.</p>	

24274	Private Individual	9. CS10	Object	I am concerned to see that several key issues raised have not been addressed through the Pre-Submission Main Modifications. 1. Failure to address the needs for key infrastructure within the Borough including roads and sewerage both of which are at full capacity. 2. The allocation of the entire Northern Fringe is a high risk strategy since delivery may not be viable. 3. How will the Sugar Beet site impact on jobs and homes growth? 4. The assessment of housing need has not been updated to reflect the most recent information.	
24276	Private Individual	9. CS10	Object	I wish to express my disappointment that the key issues I raised at the last consultation have been totally ignored without explanation. Examples below: the application is premature as the master plan has not been adopted; phasing differs between documents; traffic assessment fundamentally flawed; traffic impact and congestion; drainage and sewers; relocating Westerfield station; cumulative impacts on air quality, noise and dust; open space and sports provision; poor and energy inefficient house designs; loss of trees, hedges, biodiversity and habitat; application likely to prejudice other IGS developments. By ignoring public concerns, IBC undermines confidence in local democracy.	
24277	Private Individual	9. CS10	Object	I am disappointed that no answers have been forthcoming from the issues raised at the last consultation, and why the Borough have not bothered to answer these questions. It undermines public confidence in democracy? The main issues have been: increase in traffic, need for such a large development, lack of jobs and infrastructure, destruction of villages, effect on railway. Needs	

				have changed now, with development to come near the Holiday Inn and on the sugar beet site. Tax payers money has been spent in acquiring this site on a loan? Develop it to pay back the loan.	
24279	Private Individual	9. CS10	Object	In March 2015 we submitted comments and it would appear that the Council has completely failed to address a substantial number of key issues including: Lack of any effective policies from co-operating with neighbouring authorities such as jobs and housing. The negative impact of the development of the Northern Fringe on traffic congestion, air quality and sewage infrastructure. The failure to include the investment in the Sugar Beet located in a neighbouring authority which could impact favourably on jobs and homes growth strategies in Ipswich.	
24282	Private Individual	9. CS10	Object	In March 2015 we submitted comments and it would appear that the Council has completely failed to address a substantial number of key issues including: Lack of any effective policies from co-operating with neighbouring authorities such as jobs and housing. The negative impact of the development of the Northern Fringe on traffic congestion, air quality and sewage infrastructure. The failure to include the investment in the Sugar Beet located in a neighbouring authority which could impact favourably on jobs and homes growth strategies in Ipswich.	

24285	Private Individual	9. CS10	Object	Complete failure by you to address the viability of the allocation of the Northern Fringe due to the impact of traffic congestion, air quality and lack of sewerage infrastructure. There is a clear and urgent need for you to address the congested roads and sewerage facilities that service the whole of Ipswich which will be greater if the Northern Fringe proceeds as anticipated by you.	
24304	Northern Fringe Protection Group	9. CS10	Object	Paragraph 3.4 of the Statement of Consultation doesn't accurately capture all issues raised. Concerned genuine concerns and issues raised were disregarded. This includes issues raised in relation to the allocation of the entire Northern Fringe which may not be deliverable due to severe traffic congestion, negative impact on air quality and lack of sewage infrastructure. Failure to address cumulative needs for key strategic infrastructure within the Borough including roads and sewage infrastructure.	
24306	Private Individual	9. CS10	Object	Despite a torrent of submissions expressing concerns with the plans for the Northern Fringe no substantive changes have been made. Would be less objectionable if Council had sought to answer concerns. The Council is hell-bent on maximising risks by allocating the entire Northern Fringe. The need for the development needs to be demonstrated in terms of housing, growth and other developments. Will become a commuter suburb to other towns and cities. Enormous costs are about to be imposed on Ipswich residents by the reckless manner in which the development is being pursued.	



24271	Private Individual	9. CS10	Object	As a member of the Northern Fringe Protection Group, I am extremely disturbed to learn that key issues raised in the last consultation have been ignored, no explanation has been offered for this. Allocating the entire Ipswich Northern Fringe is a high risk strategy, as delivery may not be viable. There has been failure to address cumulative infrastructure needs and a lack of cross border co-operation on jobs and housing. Housing need data has not been updated. Obstacles identified through the Peter Brett report have not been addressed, nor has the impact of the sugar beet factory been considered.	
24250	Private Individual	9. CS10	Object	<p>We are concerned that very few of the earlier representations have not been incorporated into the amended documents. There is little point in having a public consultation if the majority of valid concerns are ignored.</p> <p>The allocation of the Northern Fringe without considering the total effect of the traffic congestion that will result will not add to the "Ipswich Vision". The housing should be phased to trigger additional road capacity by way of a northern bypass. The Wet Dock Crossing will not assist congestion in north Ipswich. The road capacity will not be achieved with improvements to existing junctions/traffic lights.</p>	
24249	Private Individual	9. CS10	Object	We are concerned that very few of the earlier representations have not been incorporated into the amended documents. There is little point in having a public consultation if the majority of valid concerns are ignored.	

				The allocation of the Northern Fringe without considering the total effect of the traffic congestion that will result will not add to the "Ipswich Vision". The housing should be phased to trigger additional road capacity by way of a northern bypass. The Wet Dock Crossing will not assist congestion in north Ipswich. The road capacity will not be achieved with improvements to existing junctions/traffic lights.	
24239	Private Individual	9. CS10	Object	We are disappointed that the main issues raised at the last consultation meeting have not been addressed. The entire Northern Fringe Development will be high risk due to severe traffic congestion, poor air quality and lack of sewage infrastructure. Good quality farm land, essential for food for the future will be concreted over. Also, the hospital is already over-stretched. The assessment of housing need has not been updated and there seem to be obstacles to jobs growth identified by a report by Peter Brett Associates in December 2014.	
24238	Private Individual	9. CS10	Object	We are disappointed that the main issues raised at the last consultation meeting have not been addressed. The entire Northern Fringe Development will be high risk due to severe traffic congestion, poor air quality and lack of sewage infrastructure. Good quality farm land, essential for food for the future will be concreted over. Also, the hospital is already over-stretched. The assessment of housing need has not been updated and there seem to be obstacles to jobs growth identified by a report by Peter Brett Associates in December 2014.	
24231	Crest Strategic Projects	10. CS10	Support	Support additional text within Policy CS10 and the supporting text, which reinforces the need for a comprehensive approach to the development of the	

				IGS and reflects the need for proposals to positively facilitate and not prejudice the development of other phases. This aligns with current work being undertaken on the Infrastructure Delivery Plan and Collaboration Agreement. Crest is a key delivery partner of the IGS. The commitment within the Core Strategy to a comprehensive and coordinated approach to the development of IGS is essential to ensure the delivery of infrastructure at an appropriate time by the relevant parties.	
24266	National Federation of Gypsy Liaison Groups	11. CS11	Object	The change to 'preferably' from 'where possible' is supported. The new criteria are unacceptable. Whilst these issues of need and personal circumstances can weigh in favour of a proposal, they are not issues which can be regarded as criteria to assess acceptability. Such a stance does not accord with guidance in paragraph 10 of Planning Policy for Traveller Sites.	
24294	Save Our Country Spaces	11. CS11	Object	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable.	
24251	Private Individual	12. CS13	Object	<p>I am writing to express disappointment that the key issues raised at the last consultation have been ignored in the modifications. There has been no reasons given.</p> <p>There has been failure to address the obstacles to jobs growth identified in the viability testing report produced by experts Peter Brett associated in December 2014 and the employment space requirements shown by the East of England forecasting 2015 model.</p>	

24281	Private Individual	12. CS13	Object	The failure to address the severe obstacles to job growth identified by the viability testing report produced by Peter Brett Associates in December 2014 and the employment space requirements identified by the East of England Forecasting 2015 Model.	
24287	Private Individual	12. CS13	Object	No account has been taken of the Peter Bretts December 2014 Liability Testing Report and East of England 2015 Employment Space Requirement Model, which highlights the severe obstacle to jobs growth which clearly impact on housing needs in Ipswich and surrounding area.	
24291	Save Our Country Spaces	12. CS13	Object	Paragraph 3.4 of the Statement of Consultation does not accurately capture all issues raised, including in relation to addressing severe obstacles to growth identified by the viability report and the employment space requirements identified by the EEFM 2015. There has also been failure to consider how the acquisition of the sugar beet site will impact on jobs and homes growth strategies in the Borough. Concerned that the genuine concerns and issues raised by the public have been disregarded. CS1-CS6 may be undeliverable, therefore CS11-20 may be undeliverable. Too many imponderables will lead to likely non-delivery. Few solutions in the modifications.	
24305	Northern Fringe Protection Group	12. CS13	Object	Paragraph 3.4 of the Statement of Consultation does not accurately capture all issues raised, including in relation to addressing severe obstacles to growth identified by the viability report and the employment space requirements identified by the EEFM 2015. There has also been failure to consider how the acquisition of the sugar beet site will impact on jobs and homes growth strategies in	

				the Borough. Concerned that the genuine concerns and issues raised by the public have been disregarded.	
24232	Crest Strategic Projects	13. CS17	Object	Emerging Policy CS17: Delivering Infrastructure - We support the addition of text to clarify that the direct provision of infrastructure by developers is allowed as mitigation for impacts, as an alternative to a commuted sum or CIL payment. This provides sufficient flexibility for developers. We suggest that similar text is also included within Policy CS10.	We suggest that similar text is also included within Policy CS10.
24252	Private Individual	13. CS17	Object	<p>I am writing to express disappointment that the key issues raised at the last consultation have been ignored in the modifications. There has been no reasons given.</p> <p>There has been a failure to address the cumulative needs for key strategic infrastructure within the Borough such as new roads and drainage as the existing are already full to capacity. Also there has been a failure to address the obstacles to jobs growth identified in the viability testing report produced by Peter Brett Associates and the employment space requirements shown by the East of England Forecasting Model.</p>	
24254	Natural England	13. CS17	Object	We welcome the amendment to ensure that the Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment (HRA) can be addressed, including for any measures not classified as infrastructure. However, we advise that reference is also made to the mitigation strategy, as this is the document which should specify the detailed mitigation measures that will need to be delivered to ensure development proposed in the plan will not	Add text to CS17: The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Mitigation Strategy can be addressed and delivered, including for any measures not classified as

				have an adverse effect on any European Protected sites. We therefore advise inserting the additional text to ensure the plan complies with the Habitats Regulations.	infrastructure.
24284	Private Individual	13. CS17	Object	The failure to address the severe obstacles to job growth identified by the viability testing report produced by Peter Brett Associates in December 2014 and the employment space requirements identified by the East of England Forecasting 2015 Model.	
24296	Save Our Country Spaces	13. CS17	Object	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. A policy to reinstate the obligation on landowners/developers to contribute to road networks should be reinstated. The modification to accelerate and allocate the Northern Fringe in its entirety is likely to overwhelm IBC's limited remit, capacity and shrinking resources to deal with this in addition to service and infrastructure delivery for the existing and new population.	
24259	Natural England	13. CS17	Object	We are pleased to see a link with the mitigation measures identified in the Habitats Regulations Assessment (HRA) of the Core Strategy. However, the final sentence 'The Council is...' is not sufficient to satisfy the requirements of the Habitats Regulations. There needs to be a commitment in the policy to having a mitigation strategy in place, ideally by the time the plan is adopted or by a specified timescale shortly afterwards. This is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and NPPF paragraphs 113 and 118.	We therefore suggest the following rewording: 'The Council will produce a mitigation strategy by {INSERT DATE} which will specify the measures required and how these will be delivered and funded'

24298	Save Our Country Spaces	13. CS17	Support	Support the proposal to seek contributions to mitigate measures in the Habitats Regulations Assessment whether classed as infrastructure or not.	
24297	Save Our Country Spaces	15. CS20	Object	Modification to accelerate and allocate the Northern Fringe in entirety is identified as causing unacceptable delays, congestion and health impacting pollution, a scenario recently explored in new case law and deemed unacceptable sustainable development. CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable.	
24233	Crest Strategic Projects	16. DM1	Object	We support the amendment to Policy DM1 which reflects the withdrawal of the Code for Sustainable Homes. However, we object to Part a. of Policy DM1 and this should be removed. The Written Ministerial Statement March 2015 and 'Fixing the Foundations' July 2015 indicate that LPAs should not set additional local technical standards for new dwellings and that the Government does not intend to proceed with 'Allowable Solutions' or the proposed increased energy efficiency requirement. Therefore, LPAs cannot require developments to meet standards higher than those set in the Building Regulations Part L.	We object to Part a. of Policy DM1 and this should be removed.
24267	Home Builders Federation Ltd	16. DM1	Object	Requiring residential development to achieve a 19% improvement in energy efficiency over Part L of the Building Regulations is contrary to national policy in the Written Ministerial Statement March 2015, the Deregulation Act 2015 (S.43), and Fixing the Foundations July 2015. The Government is not proceeding with zero carbon Allowable Solutions or the proposed 2016 increase in on-site energy	This policy should be removed. Document is not Sound

				efficiency standards. It does not wish LPAs to set targets higher than the Building Regulations. The Council cannot require that applicants go further than Part L 2013. The Council should also consider the viability implications of the water efficiency standard.	
24220	Historic England	17. DM5	Support	We support the proposed main modification which adds reference to the setting of listed buildings to Part (e) of the policy.	
24234	Crest Strategic Projects	17. DM5	Object	This policy now requires that 35% of new dwellings, built on developments of 10 or more dwellings, are built to Building Regulations standard M4(2) and where affordable housing is provided a proportion of dwellings should be built to Building Regulations standard M4(3). There is no robust evidence to justify this requirement and without this we object to the Policy. However, we welcome the flexibility provided within the Policy which will ensure that the requirements do not hinder development in circumstances where it is not possible to accommodate the requirement and/or in case were the requirement would render the development unviable.	
24244	Suffolk County Council	18. DM5	Support	DM5 (In reference to the M4(2) accessibility standard). The County Council supports the amendment relating to higher accessibility standards in new development, subject to viability assessment as set out in national guidance.	
24268	Home Builders Federation Ltd	18. DM5	Object	The policy in relation to the Part M optional technical standards is unsound because the adoption of these optional technical standards has not been justified. Before these can be adopted in the local plan the Council will need to demonstrate need and the effect on viability. The Viability	



				Testing for the Ipswich Development Plan report, December 2014, has not assessed the cost of applying these standards. The DCLG report: Housing Standards Review: Cost Impacts, September 2014 summarises the costs (p.38). The Council will also need to justify the 35% figure for Part M(2) and the percentage figure for Part M4(3).	
24221	Historic England	19. DM6	Support	We support the proposed main modification which adds reference to listed buildings and other heritage assets into clause (j). This addresses our concerns regarding the wording of this policy.	
24222	Historic England	20. DM8	Support	Re-labelling Part (a) as 'designated and un-designated assets' and adding a third and fourth paragraph is helpful in terms of covering other heritage asset types and the issue of demolition. It provides the minimum required text to address our concerns, although in the new fourth paragraph, parks and gardens are 'registered', not 'scheduled'.  We welcome the modification to Part (b) in terms of point (i) which clarifies that a building/structure can be demolished if it does not make a positive contribution to the significance of the conservation area.	
24245	Suffolk County Council	20. DM8	Support	The County Council welcomes the amendment pertaining to archaeology, which is in line with earlier representations and subsequent discussion. The revised policy wording represents a much clearer approach to archaeological assessment which is proportionate and consistent with the intent of the NPPF. The minor modifications to the Core Strategy explain the role of the Area of Archaeological Importance in signposting developers as to where there is greater potential for	

				archaeological finds. Ipswich's long history of occupation means that there is strong potential for significant finds in certain locations. This policy ensures that proper and proportionate assessment will be carried out.	
24223	Historic England	20. DM8	Object	We have concerns regarding the proposed main modifications to the archaeology paragraphs in Part (c) in terms of the deleted reference to the Area of Archaeological Importance (AAI). Removing reference to the AAI means that there is no policy guidance as to what the AAI means in terms of development proposals. We consider this modification to be unsound as it not effective in terms of delivering the plan. It does not provide sufficient clarity regarding the status of the AAI.	References to the Area of Archaeological Importance should be reinstated to Policy DM8
24235	Crest Strategic Projects	20. DM8	Object	Modifications to this Policy are not proposed, however our previous representations (Barton Willmore, March 2015) highlighted concerns regarding Part b. "Conservation Areas" which states that the position, height, mass and materials of a proposed building shall pay regard to the character of adjoining buildings. This is not objected to however, 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'. [Note - DM8 Part b Conservation Areas has been modified.]	
24299	Save Our Country Spaces	21. DM10	Object	Main modification - loss of assets in conflict with CS4.	
24246	Suffolk County Council	23. DM18	Support	The County Council welcomes this amendment to reflect the adoption, by the Borough Council, of countywide guidance on parking standards.	

24236	Crest Strategic Projects	25. DM24	Support	The amendment to this Policy to reflect the withdrawal of the Code for Sustainable Homes is supported.	
24247	Suffolk County Council	27. DM25	Support	The County Council welcomes the amendment to improve consistency with the adopted Suffolk Waste Plan.	
24269	Homes Builders Federation Ltd	28. DM29	Object	The part of the policy in relation to residential development is unjustified. The policy requires that developments of 15 dwellings or more provide at least 10% of the area, or 15% in higher density schemes, as public green space. In view of the Council's inability to meet its OAN in full, and because there is no plan to provide for these unmet needs elsewhere, we consider that this policy requirement is unjustified.	
24275	Sport England	28. DM29	Support	Sport England supports the modifications made to this policy which now include the need to provide for indoor as well as outdoor sports facilities where justified. The policy supporting text also makes reference to the emerging Playing Pitch Strategy and Sports Facilities Strategy as key documents that will help to inform policy/decision making as well as identify priorities for enhancing off-site facilities if on-site provision is not a reasonable option. Sport England welcomes the reference to these up to date and robust evidence bases.	
24237	Crest Strategic Projects	29. DM30	Object	Emerging Policy DM30: The Density of Residential Development - The Written Ministerial Statement - March 2015 introduces new Nationally Described Space Standards for housing. These regulations are optional and the Planning Practice Guidance (PPG) (ID: 56-002-20150327) requires LPAs to gather evidence to determine whether there is a need for additional standards and the viability	

				implications. The Council has not demonstrated there is a need or provided evidence regarding viability and therefore we object to this policy.	
24270	Home Builders Federation Ltd	29. DM30	Object	The requirement that new residential development complies with the Nationally Described Space Standard is unjustified. The Council has not demonstrated that the relevant tests set out in the NPPG have been satisfied (need, viability and timing). The Council should provide a justification for requiring the Nationally Described Space Standard. Given the scale of the unmet need in Ipswich, we would question the efficacy of adopting the standard. The plan should also specify a reasonable transition period to provide for legacy projects or land transactions currently underway. The Council should have regard to the effect the standard will have on affordability.	
24260	Natural England	30. DM31	Support	We welcome the amendment to ensure that developer contributions may be sought in some instances in relation to mitigation measures identified through assessments at planning application stage.	
24295	Save Our Country Spaces	33. DM33	Object	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. Modification and weakening is unacceptable. Green rim and green corridors are vital and should not be compromised to please landowners/developers when so much net biodiversity loss is proposed. Open space deficits in the north, east and north-west Ipswich need addressing. DM33 should not be compromised due to landowner/developer pressure. Modification to accelerate and allocate Northern Fringe in entirety will lead to significant biodiversity loss, employment loss (agriculture) and	

				irreversible loss of food growing land which is in conflict with CS1 and CS4.	
24248	Suffolk County Council	34. DM34	Support	The County Council welcomes this amendment, which helps to protect the characteristics of the Area of Outstanding Natural Beauty from the impacts of development outside the designated area.	
24261	Natural England	34. DM34	Support	We agree with the amendment to clarify that the landscape and scenic beauty of the AONB should be conserved.	
24257	Save Our Country Spaces	Core Strategy SA Report Addendum	Object	Issues raised previously haven't been addressed. The SA represents an optimistic view. For example it assumes 15% modal shift from cars to more sustainable transport. The impact on the town centre of the Council's focus on delivering the sugar beet site should be assessed. It does not assess the potential impacts of the garden suburb development halting midway. How can the SA make meaningful conclusions in light of incomplete and missing data? It should identify negative effects on heritage in relation to Red House Park. Not surprised by conclusions that there are no changes to significant effects or mitigation.	
24258	Save Our Country Spaces	Core Strategy SA Report Addendum	Support	The SA quite rightly highlights the lack of information and uncertainty in assess the effects on traffic, air quality and climate change of circa 4,000 homes identified in the Core Strategy to be built in association with neighbouring local authorities and exposes a hole in the Core Strategy which needs to be rectified at this review.	
24300	Northern Fringe Protection	Core Strategy SA Report	Object	Issues raised previously haven't been addressed. The SA represents an optimistic view. For example it assumes 15% modal shift from cars to more	

	Group	Addendum		sustainable transport. The impact on the town centre of the Council's focus on delivering the sugar beet site should be assessed. It does not assess the potential impacts of the garden suburb development halting midway. Not surprised by conclusions that there are no changes to significant effects or mitigation.	
24301	Northern Fringe Protection Group	Core Strategy SA Report Addendum	Support	The SA quite rightly highlights the lack of information and uncertainty in assess the effects on traffic, air quality and climate change of circa 4,000 homes identified in the Core Strategy to be built in association with neighbouring local authorities and exposes a hole in the Core Strategy which needs to be rectified at this review.	
24262	Natural England	Habitats Regulations Assessment Addendum	Object	As mentioned in relation to CS17/new 8.183, the wording does not give us confidence that the mitigation measures identified in the HRA will be delivered. To satisfy the Habitats Regulations, we would like to see a commitment by the Council in the policy to having an overarching mitigation strategy in place, ideally prior to the adoption of the plan. If this timescale is not practical, there should be a commitment to deliver a strategy by a specified date and an approach to determine what measures are needed in the interim. The strategy will need to include details of delivery mechanisms.	