

Ipswich Local Plan

**Proposed Submission Site Allocations and Policies
(Incorporating IP-One Area action Plan)
development plan document**

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

Contents

Introduction	1
Outline of the plan preparation process in Ipswich	1
Proposed Submission (Regulation 19) Consultation	4
Conclusion	5
Appendix 1 – Summary of Responses Received under Proposed Submission Consultation	6

1 Introduction

- 1.1 The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document is a key development plan document forming part of the Ipswich Local Plan.
- 1.2 Before the Council submits the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document (known hereinafter as the Site Allocations plan) 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. Point (v) is addressed through the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document – Statement of Consultation – Proposed Submission (September 2015). 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 Site Allocations plan 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 Site Allocations and Policies (Incorporating IP-One Area Action Plan) development plan document preparation process in Ipswich

- 2.1 The Site Allocations plan preparation process in Ipswich began in 2005, and has seen several changes along the way. In 2005, the Council started preparing four development plan documents in parallel:

- Core Strategy and Policies;
- The Requirements for Residential Developments;
- IP-One Area Action Plan; and
- Site Allocations and Policies.

2.2 This remained the case through the Issues and Options stage.

2.3 However, subsequently at the Preferred Options Stage, the Requirements for Residential Development document was combined with the Core Strategy. Thus the number of development plan documents was reduced to three. Public consultation was undertaken on the three development plan documents between January and March 2008. The Core Strategy document was then taken through to adoption in December 2011. The Council combined the Site Allocations and Policies Development Plan Document and the IP-One Area Action Plan into one plan through the Local Development Scheme review July 2012.

2.4 The Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document – Statement of Consultation – Proposed Submission (September 2015) details the consultations which have been undertaken throughout the production of the Site Allocations plan.

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 and to the planning status of some sites, 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 9th October 2015 and 23rd November 2015. Comments were invited by:

- Publishing consultation documents and comment forms for the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document;
- 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 7th 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 Proposed Submission Site Allocations plan were received from a total of 4 individuals and organisations amounting to a total of 9

representations. One further comment was made in relation to the Habitats Regulations Assessment addendum which accompanied the consultation.

- 3.5 A summary of the representations is shown in Appendix 1. The comments generally relate to issues specific to particular sites including IP011a (Lower Orwell Street), IP132 (Former St Peter's Warehouse Site) and IP047 (Land at Commercial Road). Natural England cannot agree to the conclusions of the Habitats Regulations Assessment without sight of the visitor survey report for Orwell Country Park. Anglian Water

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 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.
- 4.2 The Council considers that the approach taken has complied with Regulatory requirements and with the adopted SCI 2007 and its subsequent review 2014.

Appendix 1 – Summary of Representations on Proposed Pre-Submission Main Modifications to the Site Allocations and Policies (Incorporating IP-One Area Action Plan) development plan document (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 21st 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
24224	Historic England	36. SP2	Object	<p>IP011a: Lower Orwell Street</p> <p>While we do not object to the principle of this site being developed, the site sheet is not effective with regards to archaeological considerations, particularly with regards to the scheduled monument. The extent of archaeological potential within this site and the wider area is not fully understood and there could be nationally important archaeology within the site where development may be constrained.</p> <p>Furthermore, while the site sheet refers to the adjoining conservation area and listed building, there is no explanation of the implications for development in terms of these heritage assets.</p>	<p>In order to make the plan sound, the first and second paragraph of the development constraints section of the site sheet for IP011a should be amended along the following lines:</p> <p>"This site affects an area of archaeological importance within the area of the Anglo-Saxon and medieval town. Much of the site is a scheduled monument (List entry no: 1005985), therefore scheduled monument consent will need to be obtained via Historic England and they should be consulted at the earliest opportunity. There is a high potential for archaeological remains of national significance and detailed early pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required in order to agree the principle of development and inform design. Archaeology would be a major consideration for project costs and timescales. Proposals would need to be supported by programmes of pre-determination archaeological works which may include desk-based assessments, survey works and archaeological evaluation. Complex archaeological mitigation is likely to be required which could include watching</p>

					<p>briefs, full excavation and / or design scheme changes to allow for preservation in situ. Post-excavation analysis, assessment and reporting would also be necessary.</p> <p>The site is adjacent to the Central Conservation Area, close to a listed building (Tooley's Court) and contains trees protected through a TPO. Any proposals would need to consider the impact of development upon designated and non-designated heritage assets and their setting, including any resulting benefit, harm or loss to their significance."</p>
24225	Historic England	36. SP2	Object	<p>IP132: Former St Peter's Warehouse site, 4 Bridge Street</p> <p>While we do not object to the principle of this site being developed, we have concerns with the site sheet. While it refers to the Central Conservation Area and the listed building at 4 College Street, it does not mention the Wet Dock Conservation Area, the listed church or the listed and scheduled Wolsey's Gate. There is also no recognition of non-designated buildings within the site that have heritage interest. Furthermore, there is no explanation of the implications for development in terms of these heritage assets.</p>	<p>In order to make the plan sound, the final paragraph of the development constraints section of the site sheet for IP132 should be amended along the following lines:</p> <p>"The site is within the Central Conservation Area and adjoins the Wet Dock Conservation Area and contains a Grade II listed building at 4 College Street. It is also opposite the Grade II* listed Church of St Peter and Wolsey's Gate, a scheduled monument and listed building. Any proposals would need to consider the impact of development upon designated and non-designated heritage assets and their setting, including any resulting benefit, harm or</p>

					loss to their significance. The conservation and enhancement of the townscape should be sought, including the retention of buildings that make a positive contribution to the conservation areas."
24226	Martin Robeson and Partners	36. SP2	Object	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD. In the event the Council disagrees, full consideration must be given to allocating the site for a mix of uses, including substantial new retail floorspace. Otherwise the allocation will fail to meet development needs and the Council's own retail objectives.	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6.
24240	Anglian Water	36. SP2	Object	It is noted that it is proposed to include additional housing allocation sites in Policy SP2 which formerly had the benefit of planning permission. All of the proposed sites are expected to require improvements to the existing water supply and foul sewerage networks to enable development. Anglian Water has no objection to the principle of development on the additional housing allocations included in Policy SP2. Similarly we have no objection to the	

				proposed increase in the number of dwellings for Site IP132 Former St Peters' Warehouse site.	
24242	Suffolk County Council	36. SP2	Object	Regarding sites moved into Policy SP2: the previous permission suggests that there is no planning obstacle to their delivery. However, as the sites come forward they will still require robust assessment in terms of the impacts on SCC responsibilities, e.g. transport, education and archaeological assessment. An appendix to this letter sets out indicative infrastructure costs, with caveats, to help developers and landowners understand some of the costs which may accompany development. Site IP047 will be expected to contribute towards significant off-site highway mitigation, to be determined through a Transport Assessment, due to its scale, location and the proposed uses.	
24227	Martin Robeson and Partners	37. SP3	Object	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD.	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6.

24228	Martin Robeson and Partners	38. SP5	Object	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD. In the event the Council disagrees, full consideration must be given to allocating the site for a mix of uses, including substantial new retail floorspace. Otherwise the allocation will fail to meet development needs and the Council's own retail objectives.	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6.
24241	Anglian Water	38. SP5	Object	<p>It is noted that it is proposed to include additional employment allocation sites in Policy SP5 which formerly had the benefit of planning permission. All of the proposed sites are expected to require improvements to the existing water supply and foul sewerage networks to enable development.</p> <p>Anglian Water has no objection to the principle of development on the proposed additional allocation sites.</p>	
24229	Martin Robeson and Partners	39. SP6	Object	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6.

				<p>for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD. In the event the Council disagrees, full consideration must be given to allocating the site for a mix of uses, including substantial new retail floorspace. Otherwise the allocation will fail to meet development needs and the Council's own retail objectives.</p>	
24265	Natural England	Habitats Regulations Assessment	Object	<p>We would like to see the final version of the Orwell County Park visitor survey, as the summary of the results presented in section 2.4 includes insufficient evidence for us to reach the conclusions presented in the HRA. We welcome the acknowledgement that appropriate management measures (section 2.4.9) are required to enable a conclusion of no adverse effect on the integrity of the SPA resulting from the proposed extension to the Country Park. To satisfy the Habitats Regulations, appropriate management measures must be referenced and included in the proposed overarching mitigation strategy. Also wish to discuss the England Coast Path.</p> <p>We are therefore unable to agree with the conclusions of the appropriate assessment, i.e. no adverse effect on integrity, without further information on the visitor survey and additional wording (in</p>	

				the relevant Plan policies), which would provide us with sufficient confidence that there was a legal commitment to deliver appropriate mitigation.	
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