

Ipswich Borough Council Local Plan

Representations made in accordance with Regulations
20 (in response to consultation at Regulation 19 Stage)
in Respondent Order



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Core Strategy and Policies
Development Plan Document Review Final Draft

Record count: 337

26248

Support

Chapter 7 - Key Diagram**Respondent:** AONB**Summary:**

Diagram 3 has been amended to include the small area of the Suffolk Coast & Heaths AONB that falls within the Ipswich Local Plan boundary. This change was requested by the AONB team in representations submitted to the Preferred Options consultation

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

26256

Support

Policy DM8 The Natural Environment**Respondent:** AONB**Summary:**

The title link to policy DM8 under Chapter 9 currently reads The Natural Development. This should be changed to read The Natural Environment

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

26255

Support

Policy DM11 Countryside**Respondent:** AONB**Summary:**

The change to policy DM11 with regards the AONB is acknowledged and welcomed. This change was requested by the AONB team as part of our representations to the Preferred Options consultation.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

26252

Support

Policy CS4 Protecting our Assets**Respondent:** AONB**Summary:**

The AONB team welcomes the amendment to bullet point (h) Policy CS4 which will help ensure that the purposes for designation of the Suffolk Coast & Heaths is recognised and that the Natural Beauty & Special Qualities of the nationally designated landscape is considered as part of decision making.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

26254

Object

Policy DM8 The Natural Environment**Respondent:** AONB**Summary:**

The AONB team support the objectives of this policy. European protected sites are now called Habitats Sites and the policy should be amended to reflect this for accuracy- see below

Change suggested by respondent:

"Sites of International and National Importance

Proposals which would have an adverse impact on Habitats Sites will not be permitted, either alone or in combination with other proposals, unless imperative reasons of overriding public interest exist in accordance with the provisions of the European Habitats Directive."

Legally Not specified

compliant:

Sound: Yes

Comply with Not specified

duty:

Attachments: None

26257

Object

Policy DM34 Delivery and expansion of Digital Communication Networks**Respondent:** AONB**Summary:**

The AONB team is concerned about potential impacts of new 5G technology and other telecommunications equipment on the Natural Beauty of the Suffolk Coast & Heaths AONB.

The team is seeking an amendment to criteria b of policy DM34.

Change suggested by respondent:

"b. Proposals for the expansion of electronic communications networks, including next generation mobile technology (such as 5G) will be supported, where they preserve the historic environment, do not harm the Natural Beauty of the AONB and/or the appearance of the street scene."

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

26434

Object

Appendix 6 - Marketing Requirements**Respondent:** AquiGen**Agent:** AquiGen**Summary:**

Welcome introduction of marketing requirements - offers basis for early agreement with Council. However, aspects are onerous and should be removed. Paragraph 2.1: discussions with Council before marketing unnecessary if marketing requirements in Appendix 6 are followed. Adds hurdle to process/could delay marketing. Paragraph 2.5: welcome amendment to require simple schedule noting origin of enquiry and reason for interest is sufficient. Paragraph 2.6: commercial site not generally marketed at set market value as this is determined by the offer that a purchaser is willing to make. "All Enquiries" exercise is appropriate as it generates enquiries on all potential purchase options.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26436

Object

Policy CS13 Planning for Jobs Growth**Respondent:** AquiGen**Agent:** AquiGen**Summary:**

Land allocation should be consistent with needs identified in Evidence Base. 23.2ha requirement represents most up-to-date figure to base allocation on. When compared with total land allocated for employment use (28.34ha) under Policy SP5, there is a significant amount of land allocated in excess of requirement. Even allowing for flexibility, the excess is not justified. Entirely appropriate to consider reducing land allocation to reflect actual need. Allocations require further review to ensure consistency with Evidence Base and to achieve soundness. Recommend land identified in Plan is reduced under Policy CS13 to circa 23ha.

Change suggested by respondent:

Review allocation of employment land and change to circa 23ha to be consistent with Evidence Base

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26435

Object

Policy DM32 Retail Proposals Outside Defined Centres**Respondent:** AquiGen**Agent:** AquiGen**Summary:**

Object to criterion (a) which requires consideration of the appropriateness of scale when assessing out-of-centre retail proposals. Use of 'scale' no longer recommended by national guidance and is therefore inconsistent with the NPPF which only requires an applicant to demonstrate compliance with the Sequential Approach and Impact. As identified in paragraph 89 b), scale forms part of the consideration of Impact. Therefore, no requirement to demonstrate appropriateness of scale separate from Impact. In addition, requirement to demonstrate scale not identified by Evidence Base as a retail policy requirement based on the characteristic of the area. Recommend criterion (a) removed.

Change suggested by respondent:

Remove criterion (a)

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26431

Object

Policy DM33 Protection of Employment Land**Respondent:** AquiGen**Agent:** AquiGen**Summary:**

Policy continues to only specifically allow for consideration of no reasonable prospect of re-use for employment purposes for sites outside the Employment Areas. Ambiguity in the supporting paragraphs as 9.32.2 and 9.32.4 suggest that the no reasonable prospect test could be applied to Employment Area land.

NPPF paragraph 120 relates to allocated land and recommends the use of the no reasonable prospect test. Recommend DM33 is amended to allow the test to be applied to all defined Employment Area land. Will ensure plan is consistent with national guidance and flexible to deal with changing market needs. Important given surplus allocation.

Change suggested by respondent:

Recommend DM33 is amended to allow the test to be applied to all defined Employment Area land.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26478

Object

Plan 2 Flood Risk**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

The Flood Risk areas defined on Plan 2 reflect, we understand, the definitive Flood Maps maintained and published by the Environment Agency. However, whilst the Environment Agency Flood Maps distinguish between Zone 3 and Zone 3 with tidal flood defence, Plan 2 does not. Given the Environment Agency is responsible for the update of these Maps, request that Plan 2 and/or the Core Strategy and Policies Development Plan Document includes a note making clear the flood zones shown on Plan 2 are indicative and that IBC will rely on the current Environment Agency Flood Maps for decision making purposes.

Change suggested by respondent:

Request that Plan 2 and/or the Core Strategy and Policies Development Plan Document should include a note making clear that the flood zones shown on Plan 2 are indicative and that IBC will rely on the current Environment Agency Flood Maps to determine what flood risk zone any site may fall within for decision making purposes.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26468

Object

Policy CS2 The Location and Nature of Development**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

The Island Site is situated within the Waterfront area to which this policy applies. As noted at para 5.21, parts of the operational port are also within it. ABP notes the desire of IBC to secure high density development in the interests of maximising the use of previously developed land, subject to that not compromising heritage assets and the historic character of Ipswich. ABP's vision for the site (agreed with the partners and the LEP) does not envisage 'high density' development as currently defined in Policy DM23. ABP request additional wording in the final paragraph of Policy CS2.

Change suggested by respondent:

Policy CS2 should be amended as follows "...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets.. " or wording of similar effect.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26469

Object

Policy CS3 IP-One Area Action Plan**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Support regeneration objectives for IP-One area. Important elements of the Port within or adjacent to area. Development should have regard to existing port uses/activities to ensure they are protected. Concerned to ensure right and ability to use land and infrastructure for port purposes is retained and Port's 'significant (economic) role' and ability to expand is protected. Request that recognition is made to the Port and other important existing employment/activities within/adjoining IP-One area which the Council wishes to safeguard and support. Development should be sensitive to existing uses and avoid potential impacts which may prejudice the continued operation/expansion of these uses.

Change suggested by respondent:

Request the addition of a new criterion into any new policy based on Policy CS3:

"New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses."

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

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26470

Object

Policy CS8 Housing Type and Tenure**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP welcomes IBC's policy on housing type and tenure mix and the recognition of potential exceptions to these requirements in response, for example, to viability constraints. ABP also notes the desire of IBC to secure high density development on central sites (para 8.121) which will also assist viability. However, high density may not be appropriate in all instances.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26471

Support

Policy CS12 Affordable Housing**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP notes the requirement for major new development (10+ dwellings) to provide 15% affordable housing and welcomes the flexibility within the wording of Policy CS12 both in respect of the proportion of affordable housing and tenure mix where development viability justifies it.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26472

Support

Policy CS13 Planning for Jobs Growth**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP welcomes and supports the inclusion in Policy CS13 of reference at sub-point b. to the need to protect "land for employment uses in existing employment areas defined on the policies map, including the function and strategic role of the port to Ipswich" in response to ABP's specific request for such reference in the previous Core Strategy and Policies Development Plan Document Review Preferred Options.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26473

Object

Policy CS20 Key Transport Proposals**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Welcome intention to make case for highway improvements including Wet Dock Crossing. Support recognition (para 8.243) that provision of Wet Dock Crossing is not a pre-requisite of access improvements to enable development. Whilst supportive of redevelopment of Island Site, delivery is dependent on commercial viability. Until satisfactory scheme agreed, reserve right to use site as operational port area and to restrict access. Disagree with reference to requirement of road bridge to enable development at Island Site (para 8.247) - request removal. Access required will depend on development - reduced density of approximately 150 units, may not require additional vehicular access.

Change suggested by respondent:

Not appropriate to be so prescriptive about the need for a new road bridge and we would request the removal of reference to it:

"at a minimum, a road bridge from the west bank to the Island Site...will be required to enable any significant development on the Island".

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26474

Object

Policy DM12 Design and Character**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP is supportive of IBC's desire for all new development to be well designed and sustainable, for 25% of new dwellings to be built to Building Regulations standard M4(2), and for proposals to respect the special character and distinctiveness of Ipswich including ensuring good public realm design. However, this should not be at the expense of development viability and the policy should be applied flexibly in the context of the objective to achieve sustainable regeneration.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26475

Object

Policy DM13 Built Heritage and Conservation**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Objection to reference in Policy under section titled 'Conservation Areas' to the demolition of buildings and to the consideration by the Council of "the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area". ABP benefits from 'permitted development' rights over its 'operational land'. Reliance on these rights is critical to the ability to fulfil its statutory duties. Strongly resist any steps to withdraw permitted development rights. If reference to withdrawal of permitted development rights does not encompass those enjoyed by ABP, specific clarification should be included.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26476

Support

Policy DM22 Car and Cycle Parking in New Development**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP welcomes IBC's qualification that it will not insist on the requirement to meet Nationally Described Space Standards if this is demonstrated to be unviable in specific cases.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26477

Support

Policy DM33 Protection of Employment Land

Respondent: Associated British Ports

Agent: Associated British Ports

Summary:

ABP supports the safeguarding of the operational areas of the Port through their definition as Employment Areas E9 and E12 on the Policies Map and under Policy DM33. Welcome the recognition at para 9.33.6 of the need for ABP's specific operational requirements and consents and licences for the handling and storage of hazardous substances to be taken into account in any development planned in the vicinity of these areas.

Change suggested by respondent:

N/A

Legally Not specified

compliant:

Sound: Yes

Comply with Not specified

duty:

Attachments:

26463

Support

Chapter 2 - The Planning System

Respondent: Babergh District Council & Midsuffolk District Council

Agent: Babergh District Council & Midsuffolk District Council

Summary:

Support the spatial strategy for continued urban regeneration in central Ipswich and development of the Ipswich Garden Suburb and land at Humber Doucy Lane.

Change suggested by respondent:

N/A

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments:

26453

Support

Policy CS10 Ipswich Garden Suburb**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

Support the delivery of homes at the Ipswich Garden Suburb and associated infrastructure, in particular the 1,200-place secondary school. It is essential that this secondary school is delivered alongside the housing.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26467

Object

Chapter 8 - The Spatial Strategy of the Core Strategy**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

A comment was made to the previous Regulation 18 consultation in March 2019 undertaken by Ipswich Borough Council, where Babergh and Mid Suffolk District Councils sought a re-phrasing of paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan. This paragraph remains unchanged.

Change suggested by respondent:

Re-phrase paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26450

Object

Policy CS2 The Location and Nature of Development**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

Before an assumption is made that later in the plan period, housing land supply opportunities in Ipswich Borough will be limited, a comprehensive regeneration and asset strategy needs to be undertaken to exhaust all other options. Through measures contained in the Local Transport Plan and the Suffolk County Council Transport Mitigation Strategy, it should be possible to rationalise / make better use of the amount of car parking required in Ipswich. We would have expected the parking strategy to have been produced before the assertion was made in paragraph 8.58 of limited housing land supply opportunities.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26464

Object

Policy CS7 The Amount of Housing Required**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

Policy CS7 contradicts the text in paragraph 8.58. Whilst it is correct the Ipswich Housing Market Area authorities discuss the housing requirement for each local planning authority in the IHMA through the ISPA Board, before considering any implications for not being able to meet need, the text in paragraph C3 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) needs to be adhered to.

Change suggested by respondent:

The text in paragraph C3 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) needs to be adhered to.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26454

Object

Policy CS11 Gypsy and Traveller Accommodation**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

Object to wording in Paragraph 8.141 and Policy CS11.

Whilst work is being undertaken with neighbouring authorities on short-stay provision within the Ipswich Strategic Planning Area as part of wider work in Suffolk, no contact has been made with Babergh and Mid Suffolk District Councils regarding permanent provision.

It is identified that Ipswich Borough Council need to find 27 permanent pitches to 2036.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26460

Object

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

Para 8.207 - Support the collaborative working on the Recreational disturbance Avoidance and Mitigation Strategy (RAMS), although need to ensure that any RAMS contributions collected are spent to mitigate the impact from the development that has generated the need for the RAMS contribution.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26459

Object

Policy CS17 Delivering Infrastructure**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

Para. 8.218 - Support the collaborative working on the Recreational disturbance Avoidance and Mitigation Strategy (RAMS), although need to ensure that any RAMS contributions collected are spent to mitigate the impact from the development that has generated the need for the RAMS contribution.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26461

Object

Policy CS20 Key Transport Proposals**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

In respect of a 'Transport Mitigation Strategy' for the Ipswich Strategic Planning Area, this paragraph states: 'Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board'. Additional text needs to be added to also say, '... and to be agreed by each respective local planning authority'.

Change suggested by respondent:

Additional text needs to be added to also say, '... and to be agreed by each respective local planning authority'.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26462

Object

Policy CS20 Key Transport Proposals**Respondent:** Babergh District Council & Midsuffolk District Council**Agent:** Babergh District Council & Midsuffolk District Council**Summary:**

Object to reference to an Ipswich Northern Route as this is no longer supported by Babergh or Mid Suffolk District Councils. However, appreciate that the decision by Suffolk County Council to not pursue funding for an Ipswich Northern Route was made after the emerging Ipswich Local Plan was published for consultation.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26581

Object

Policy ISPA1 Growth in the Ipswich Strategic Planning Area**Respondent:** Bloor Homes**Summary:**

We support the recognition within the Plan that the Council will need to work closely with neighbouring authorities regarding future development and infrastructure, as set out in the first strategic objective. However, as expanded upon below we do not consider that the Council have fully explored all opportunities to work with neighbouring authorities to meet full identified housing needs throughout the Plan period as a whole, as also set out in response to the Suffolk Coastal emerging Local Plan (refer to Appendix C).

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26590

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Bloor Homes**Summary:**

There is a lack of a coordinated approach, with allocations proposed within Ipswich. Concerned that spatial strategy has been unduly influenced by the administrative boundary, e.g. SHELAA only looking at sites within IBC. The Site has the potential to help meet housing needs within a location (East of Ipswich) which has already been tested through the Suffolk Coastal Local Plan plan-making process and found to be a sustainable location for growth. Do not consider the Site has been robustly assessed, subsequently a sustainable option for growth being rejected without justification. 200 homes (shorter term) and 1,200 homes (medium term)

Change suggested by respondent:

Allocate site identified at Humber Doucy Lane.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26582

Object

Policy CS7 The Amount of Housing Required**Respondent:** Bloor Homes**Summary:**

No housing trajectory and the rate of delivery unknown. This is a significant failure. The Site can deliver a smaller scale housing development of around 200 homes within the early Plan period. Without full consideration of this and joint working to increase delivery, the stepped trajectory has not been justified and is unsound. Plan is also overly-reliant on delivery of IGS for stepped delivery. Question the overall housing requirement and whether the Council have adequately considered uplifting to support economic growth as this contradicts paragraph 8.168. Contrary to NPPF 35 and not positively prepared or effective.

Change suggested by respondent:

Allocate identified site to address early plan delivery issues. Include a housing trajectory. Apply an uplift to the housing requirement to support economic growth.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26586

Object

Policy CS8 Housing Type and Tenure**Respondent:** Bloor Homes**Summary:**

There is a disconnect between Policy CS8 seeking a mix of housing to meet the identified needs and site allocations, contrary to national policy. 61% of dwellings proposed are at a high density. These are likely to be small flats and over saturate this market. 13% of dwellings will be low density and predominantly houses, we question if this will meet the actual housing mix identified in qualitative terms or the overall need figure. IGS only likely to deliver post 2024 so there is a need for 3-bedroom and larger homes in early plan period. The Site can deliver this.

Change suggested by respondent:

Allocate Site at Humber Doucy Lane to deliver a mix of housing that reflects SHMA in early plan period.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26585

Object

Policy CS12 Affordable Housing**Respondent:** Bloor Homes**Summary:**

The plan allocates a total of 1,647 affordable dwellings (assuming 30% IGS and ISPA4 and 15% on all other sites including windfall). In all likelihood this is overly optimistic given that most windfall sites are likely to be small and fall below the threshold set in Policy CS12. Based on the 239 dwellings per year in the SHMA, this would result in 38% of the affordable need. This is insufficient. Contrary to NPPF 20 and PPG. The Site can come forward to provide market and affordable housing to assist with meeting the need, working with East Suffolk.

Change suggested by respondent:

Allocate the Site at Humber Doucy Lane to help address the affordable housing shortage.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26553

Support

Chapter 6 - Vision and Objectives**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company offers its general support for the spatial strategy, as set out at paragraphs 6.10 to 6.22, and, in particular, the objective of focusing development in central Ipswich in order to tackle issues of deprivation and social exclusion (see also paragraph 6.8 - Objective 3). Summary: Support.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Yes**Comply with** Not specified**duty:****Attachments:**

26555

Support

Policy CS3 IP-One Area Action Plan**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company welcomes the change made to criterion c and the explicit recognition that guidance set out in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft may not always be the optimum way to develop a site. Summary: Support

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Yes**Comply with** Not specified**duty:****Attachments:**

26557

Support

Policy CS8 Housing Type and Tenure**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and 'abnormals' relating to a site, it may not always be viable to provide a full mix of dwelling types and sizes. Summary: General support.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26552

Object

Chapter 6 - Vision and Objectives**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company continues to support the general Vision as is set out at paragraph 6.7. It is also in general agreement with the Objectives (paragraph 6.8), but considers that there should be explicit recognition that, unless development is viable (or is subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved (and is unsound). Object for the reasons set out above. The inclusion of the word 'viable' needs to be added to Objective 4.

Change suggested by respondent:

The inclusion of the word 'viable' needs to be added to Objective 4.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26562

Support

Policy DM13 Built Heritage and Conservation**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company supports the general objectives set out in this policy and is satisfied with the revised wording of the policy, which better accords with the guidance set out in the NPPF. Summary: General support.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26564

Support

Policy DM22 Car and Cycle Parking in New Development**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company welcomes the recognition (para 9.21.6) that many people still own cars and that adequate levels of residential parking, that uses land efficiently and is well designed, needs to be provided as part of new residential schemes. Summary: Support.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26565

Support

Policy DM23 The Density of Residential Development**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company welcomes the policy support for high densities of residential development in the Portman Quarter and Waterfront areas. Summary: Support.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26554

Support

Policy CS2 The Location and Nature of Development**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

Policy CS2 gives expression to the Council's spatial strategy and its main principles are supported by the Company. In particular, the Company again notes the focus that is being placed upon the IP-One Area, where high-density development will be the norm. The Company notes, and welcomes, the changes made to criterion h of the policy, which is now consistent with the guidance set out in the NPPF. Summary: Support

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26556

Object

Policy CS5 Improving Accessibility**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

Generally welcomes, and supports, initiatives that are designed to minimise the need to travel and promote foot, bicycle and public transport travel modes. Also welcomes recognition that some journeys will need to be made by car, however, disappointed that only the Town Centre is specifically mentioned as being a location, the vitality and viable of which, depends upon access by a variety of transport modes. Of the view that, in order for the Final Draft to be found sound, this 'recognition' needs to be expanded to include the whole of the IP-One Area. Summary: Object for reasons set out above.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26558

Support

Policy CS12 Affordable Housing**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and 'abnormals' relating to a site, it may not always be viable to provide full affordable housing provision. It is understood that the Council will shortly be progressing with its proposed Community Infrastructure Levy. This will place additional financial burdens upon development and, in some circumstances, reduce the amount of affordable housing that can be provided (on viability grounds). Summary: General support.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26559

Object

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

Whilst generally supportive of the objectives of this policy, in order for the Plan to be sound, there should be an explicit recognition that, on high density sites within the IP-One Area, and particularly along the Waterfront, it won't be possible to make full provision for private, and public, open space, in accordance with the Council's standards. Open space is a 'land hungry' use and, if developments have to meet full standards, densities will be greatly reduced. Could threaten achievement of the Council's spatial strategy and result in new development not making the best/most effective use of previously developed sites.

Change suggested by respondent:

Include reference within policy that "on high density sites within the IP-One Area, and particularly along the Waterfront, it won't be possible to make full provision for private, and public, open space, in accordance with the Council's standards."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26560

Object

Policy DM6 Provision of New Open Spaces, Sport and Recreational Facilities**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company again offers its general support to the objectives of the policy, but considers that, in order to be found sound, it needs to be more explicit in recognising that, on higher density, previously developed sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council's standards. Summary: Object for the reasons set out above.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26561

Object

Policy DM7 Provision of Private Outdoor Amenity Space and New and Existing Developments**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

There should be explicit recognition that, in respect of high density, previously developed sites, it may not always be possible to make full provision for private amenity space to accord with the Council's standards. Summary: Object for the reasons set out above.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26563

Object

Policy DM15 Tall Buildings**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

Whilst generally supportive, objection to exclusion of IP035 from the 'arc of land', where tall buildings may be appropriate, as shown on IP-One Area Inset Proposals Map. Costs of developing IP035 are such that high density development, potentially involving 'tall buildings', will be required. Council has granted planning permission to redevelop the site for mixed use purposes, with buildings ranging from 7-11 storeys and 'tall buildings' have been developed on a number of adjacent sites. Policy will potentially frustrate development of this key Waterfront site - therefore, unsound. Impacts upon adjacent listed buildings and heritage assets, addressed under DM13.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26312

Object

Policy DM3 Air Quality**Respondent:** Clean Air Ipswich**Agent:** Clean Air Ipswich**Summary:**

Extensive modal shift required in Ipswich to improve air quality, reduce carbon emissions and reduce impacts of traffic from new developments. Suffolk County Council modelling indicates just over 15% modal shift required in Ipswich by 2026 (as well as improvements to existing network). Sustainable travel options in Ipswich are poor/need considerable investment. Insufficient evidence that funding to deliver required improvements is available. Local Plan is unsound - there are insufficient actions and investments proposed to improve air quality and deliver required modal shift. Cycling network is poor - people won't want to cycle and there is lack of cycle training.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26297

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Constable Homes Ltd**Summary:**

These representations relate to the promotion of Red House Farm for residential development. Constable Homes Ltd has an interest in the land referred to as Red House Farm. Constable Homes is an operating subsidiary of the Anderson Group, which is a private development and construction business. The extent of our client's ownership is defined by the red line shown on Figure 1.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26298

Object

Policy CS7 The Amount of Housing Required**Respondent:** Constable Homes Ltd**Summary:**

Presume shortfall of 796 units is a result of the housing supply period being reduced to 2019-2036 (Table 4). Please clarify. Ipswich only delivered 46% of the minimum target. Previous year, the measurement for Ipswich Borough Council was 66%. This indicates that housing delivery has worsened and measures needed to recover the position. Also very close to the 45% threshold in 2019 NPPF paragraph 215b. Threshold will increase to 75% next year which reinforces the urgency of addressing the significant shortfall in housing delivery. Council should be proactively identifying opportunities to accelerate delivery to overcome the significant shortfall.

Change suggested by respondent:

Clarify shortfall of 796 units.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26300

Object

Policy CS7 The Amount of Housing Required**Respondent:** Constable Homes Ltd**Summary:**

Paragraph 73 (NPPF) states 20% buffer to the five year supply should be applied. This adds to significant challenge of meeting 75% of need. Assumed date is February 2021. No buffer applied to Policy CS7. To be effective, a buffer equivalent to one year's supply (445 dwellings) should be added to five year housing land supply. Council is in a critical position of acute under supply and failing to quantify the need increases likelihood that unmet need won't be addressed. An immediate review of the Plan will be necessary if the Council is only targeting a capped need figure.

Change suggested by respondent:

In order for the Plan to be effective, a buffer equivalent to one year's supply (445 dwellings) units should be added to the five year housing land supply.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26301

Object

Policy CS8 Housing Type and Tenure**Respondent:** Constable Homes Ltd**Summary:**

Have considered suitability of an element of care accommodation rather than convention 100 dwelling scheme but told by Council officers there is no need for elderly accommodation. SHMA update explains that 65+ population will increase dramatically. Policy does not separate elderly provision from other forms of housing and so would contribute to the Council's five year housing land supply. Therefore surprising that Council is not actively encouraging this form of development. A retirement village is also different to sheltered housing, where the surplus is noted. Trickle-down benefits from down-sizing to elderly provision. Will continue to engage with Council.

Change suggested by respondent:

Policy CS8 should be expanded to acknowledge that retirement living proposals are supported in order for the Plan to be effective.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26302

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Constable Homes Ltd**Summary:**

Client's land is area N3(b) (Figure 2). Reiterate concerns that the Council continues to number the phases in a way that implies they should be delivered in numerical order. SPD shows development can come forward in a self-contained manner. A safe and effective access from Tuddenham Road can be achieved. Surprised that when the Council interprets its own policy that this development would be precluded rather than positively facilitated. Suggest that the policy wording be amended to outline how each parcel could come forward individually to be sufficiently flexible and facilitate timely delivery of much needed residential accommodation.

Change suggested by respondent:

Policy wording be amended to outline how each parcel could come forward individually, whilst still being in general accordance with the Council's growth strategy and the requirement for balanced growth across the strategic allocation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26551

Object

Policy CS20 Key Transport Proposals**Respondent:** Cycle Ipswich**Agent:** Cycle Ipswich**Summary:**

Local plan not radical enough. To solve air quality, obesity, health issues due to physical inactivity, traffic congestion, etc, there needs to be change in modal shift and improved walking and cycling infrastructure. Park and Ride facilities negatively impact on rural bus services outside of Ipswich. Rural services should be prioritised over park and rides. Nothing in CS20 about reducing rat running on residential roads, increasing use of 20mph speed limits, nor implementing protected cycle tracks - key to achieving required modal shift to reduce congestion and air pollution. Proposals likely to have little effect on walking and cycling levels.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26540

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Department for Education (DfE)**Summary:**

DfE supports the Council's prioritisation of education infrastructure, and the allocation and safeguarding of land for schools as set out in the following policies: Ipswich Garden Suburb (Policy CS10) – 1 secondary school and 3 primary schools. DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.

Change suggested by respondent:

DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26541

Object

Policy CS17 Delivering Infrastructure**Respondent:** Department for Education (DfE)**Summary:**

While DfE supports Policy CS17, we request a minor amendment either to the policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This minor amendment would help to demonstrate that the plan is positively prepared and deliverable over its period.

Change suggested by respondent:

We request a minor amendment either to the policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26262

Support

Chapter 4 - The Duty to Co-Operate**Respondent:** East Suffolk and North Essex NHS Foundation Trust (ESNEFT)**Summary:**

ESNEFT is undergoing a Sustainability Transformation Plan (STP) to determine how acute hospital healthcare provision will be provided. Acute hospital trusts are required to provide early delivery of additional inpatient bed spaces, which for Ipswich will support growth and resilience across the local health economy. Significant investment in healthcare facilities and services is/ will be taking place, to meet requirements of existing and future catchment population by planned new housing growth included in the Local Plan. A new Emergency Department and Urgent Treatment Centre, is due to be implemented 2020/21. to deliver the STP a planning policy basis is needed.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26266

Object

Chapter 10 - Implementation**Respondent:** East Suffolk and North Essex NHS Foundation Trust (ESNEFT)**Summary:**

It is noted that health and emergency services are again referred to, although there is no specific reference to acute hospital facilities. Therefore, amendments requested.

Change suggested by respondent:

Page 203 – list of strategic infrastructure facilities. Under 'Community facilities' add the following to the description of facilities

"improved acute and general healthcare provision at Heath Road Hospital"

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26265

Object

Policy CS17 Delivering Infrastructure**Respondent:** East Suffolk and North Essex NHS Foundation Trust (ESNEFT)**Summary:**

It is noted that health and emergency services are again referred to, although there is no specific reference to acute hospital facilities. Therefore point 3 and bullet point 7 of the policy wording require amendment.

Change suggested by respondent:

Point 3 on page 98 – amend to read;

3. health including acute care and emergency services.

Bullet point 7 on page 98 – amend to read;

■ community facilities including GP surgeries, health centres and key acute inpatient and outpatient facilities;

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26263

Object

Policy CS19 Provision of Health Services**Respondent:** East Suffolk and North Essex NHS Foundation Trust (ESNEFT)**Summary:**

No objection to masterplan approach which reflects ESNEFT's intentions, but inclusion of the word 'safeguards' is unnecessarily restrictive and inflexible. ESNEFT requires further flexibility in how it plans and develops the Hospital site which may include non-health care provision, should land become surplus to health care requirements. To allow for further flexibility, the inclusion of 'other ancillary uses' should be added to the policy. The Policy would not; enable sufficient flexibility to enable ESNEFT to realise its development requirements, reflect legal or procedural requirements, or reflect the most appropriate strategy for the site, contrary to NPPF paragraph 35. Amendments needed.

Change suggested by respondent:

Recommended the policy wording is amended as follows:

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

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

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

**Legally No
compliant:**

Sound: No

**Comply with Not specified
duty:**

Attachments:

26264

Object

Policy CS19 Provision of Health Services**Respondent:** East Suffolk and North Essex NHS Foundation Trust (ESNEFT)**Summary:**

It is also requested that the last sentence of the supporting text within Paragraph 8.229 is deleted as it covers healthcare matters that go beyond the scope of the Local Planning Authority's remit. Additional sentences are requested to demonstrate examples of the other ancillary uses referred to above. The supporting text (paragraph 8.230) also needs to be amended to link any parking issues to those directly associated with proposed hospital activity related to specific developments, rather than any parking issues that may be occurring in the area generally.

Change suggested by respondent:

Requested revision to paragraph 8.229:

The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. The policy allows for a range of healthcare and other compatible uses, including staff support services to assist with recruitment and retention. Additional ancillary uses may also include shared facilities to deliver a mutual benefit to other public sector organisations aligned with the one public estate agenda.

Requested revision to paragraph 8.230:

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

Legally No**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26390

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

Would like to highlight that the equivalent policy in the Suffolk Coastal Final Draft Local Plan includes reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural green space. Suggested that policy ISPA2 should also reference these strategic priorities. This would align the policy with the Statement of Common Ground between ISPA authorities which specifically references these points. IBC will be aware that following the publication of the Ipswich Local Plan Review Final Draft, there have been recent announcements relating to ceasing the Ipswich Northern Routes project.

Change suggested by respondent:

Include reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural green space in policy ISPA2

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26391

Support

Policy ISPA3 Cross Boundary mitigation of effects on Protected Habitats and Species**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

The Council is supportive of the commitment to address the issue of recreational impact avoidance and mitigation through continued joint working. This policy reflects the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.3) and is considered by the council to be sound.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

26392

Support

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

Supportive of general principles regarding the development of land at Humber Doucy Lane. Approach is complementary of the Suffolk Coastal Final Draft Local Plan policy for land at Humber Doucy Lane, and along with other policies and allocations in Ipswich Local Plan Final Draft, contributes towards the outcome outlined in the Statement of Common Ground of each local planning authority meeting housing need within their own area.

In particular, the Council supports the 30% affordable housing requirement for ISPA4 which complements the affordable housing policy in the Suffolk Coastal Final Draft Plan.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26393

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

Suggested that policy for development at northern end of Humber Doucy Lane references maintenance of separation between Ipswich and surrounding settlements, for consistency with DM11. Noted that ISPA4 infers that SANGs will be required on both sides of Borough boundary. For clarity and to enable provision for SANGs to be considered through project level Habitats Regulations Assessment, and to be reflective of plan level HRA, policy could provide appropriate level of flexibility by not specifying that SANGs be located on both sides of boundary. Suitable Accessible Natural Greenspaces should be changed to Suitable Alternative Natural Greenspaces to reflect term SANGs.

Change suggested by respondent:

Policy should reference maintenance of separation between Ipswich and surrounding settlements. Policy could provide appropriate level of flexibility by not specifying that SANG be located on both sides of boundary. Suitable Accessible Natural Greenspaces should be changed to Suitable Alternative Natural Greenspaces.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26394

Support

Policy CS10 Ipswich Garden Suburb**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

The Council welcomes the protection of physical separation between Ipswich and Westerfield village. This accords with Policy SCLP10.5 of the Suffolk Coastal Final Draft Local Plan which aims to prevent the development of land that leads to urbanising effects between settlements.

CS10 also facilitates a country park towards the north of the Ipswich Garden Suburb and the Suffolk Coastal Final Draft Local Plan carries forward the allocation of land as part of the country park (Policy SCLP12.23).

This approach is considered by the Council to be sound.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Yes**Comply with** Not specified**duty:****Attachments:**

26397

Object

Policy CS11 Gypsy and Traveller Accommodation**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

Supportive of Plan seeking to identify land within Borough for permanent Gypsy and Traveller pitches to meet identified need. Statement of Common Ground states that each local authority's plan will meet its own need and address delivery. Where capacity cannot be met within the authority's boundary, comprehensive re-assessment of deliverability will be undertaken. ISPA board will consider how unmet need can be met within the ISPA. Noted that CS11 includes reference to developing short stay site between Ipswich and Felixstowe - policy should apply flexibility in meeting short stay needs to be consistent with approach in Statement of Common Ground.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26400

Support

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

The Council supports and welcomes the approach of working with partners in respect of the Recreational Avoidance and Mitigation Strategy and a new country park with the Ipswich Garden Suburb. Both of the aforementioned aspects of this policy are reflective of the joint working being undertaken by the Council and IBC.

The Council also supports joint working with IBC and other neighbouring authorities to deliver strategic green infrastructure. In particular, the establishment of a green trail around Ipswich is reflected in Policy SCLP12.24 in the Suffolk Coastal Final Draft Local Plan.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26405

Object

Policy CS17 Delivering Infrastructure**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

Categories detailed in CS17 broadly in line with infrastructure commitments in SCLP2.2 of the Suffolk Coastal Final Draft Local Plan. Requirement for cross-boundary cooperation identified in Statement of Common Ground. Noted that CS17 refers to infrastructure to be secured from new development including early years provision. However, not clear in Table 8A of the plan whether early years provision in north east Ipswich is identified as an infrastructure priority, consistent with the Statement of Common Ground. Council has included criterion within SCLP12.24 for provision of early years setting on site, if needed. Recommend that this is replicated in ISPA4.

Change suggested by respondent:

Include criterion in Policy ISPA4 for the provision of an early years setting on site, if needed.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26412

Support

Policy CS20 Key Transport Proposals**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

The Council is supportive of IBC's positive commitment to the delivery and funding of mitigation through a transport mitigation strategy as part of collaborative working through the ISPA board. This is consistent with the ISPA Statement of Common Ground which sets out a commitment to produce a mitigation and funding strategy to mitigate the highways impact of growth across the ISPA authorities. The potential measures outlined in Policy CS20 are consistent with the potential measures outlined in the Suffolk County Council's Transport Mitigation Strategy.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26421

Support

Policy DM3 Air Quality**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

The Council notes IBC's air quality screening study, as part of the new evidence base documents for the IBC Local Plan Review. The air quality screening has considered growth across the ISPA and the Council would note that there are potential linkages with the mitigation outlined to deliver modal shift through an ISPA transport mitigation strategy.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26422

Object

Policy DM8 The Natural Environment**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

The Council is supportive of this policy and the approach it takes. However, the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP10.1) refers to the Recreational Avoidance and Mitigation Strategy (RAMS), and as such provides a development management policy approach to implementing the strategy which has been worked up on a cross-boundary basis. In this respect, to be effective, Policy DM8 could be strengthened through reference to securing contributions to facilitate the implementation of the strategy.

Change suggested by respondent:

Add reference to securing contributions to facilitate the implementation of the RAMS.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26274

Object

Chapter 6 - Vision and Objectives**Respondent:** Environment Agency**Summary:**

Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document.

Change suggested by respondent:

Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document.

Our full comments in relation to this can be found within our response to policy DM4 - Flood Risk. This is the main reason for our objection comment.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26277

Support

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Environment Agency**Summary:**

We are satisfied that this paragraphs incorporates our previous comments in relation to Natural Flood Management.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

26278

Object

Plan 2 Flood Risk**Respondent:** Environment Agency**Summary:**

This plan includes a statement which says "This plan of nationally designated flood zones relates to fluvial flooding. Further information on pluvial (surface water) flooding can be found in the Strategic Flood Risk Assessment (SFRA)." This statement is incorrect as the plan shows both fluvial and tidal flooding. This will also need to be updated when the new modelling which will be within the living SFRA when completed.

Change suggested by respondent:

This plan includes a statement which says "This plan of nationally designated flood zones relates to fluvial flooding. Further information on pluvial (surface water) flooding can be found in the Strategic Flood Risk Assessment (SFRA)." This statement is incorrect as the plan shows both fluvial and tidal flooding. This will also need to be updated when the new modelling which will be within the living SFRA when completed.

Our full comments on the SFRA can be found in our response to policy DM4 - Development and Flood Risk.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

26275

Object

Policy CS1 Sustainable Development**Respondent:** Environment Agency**Summary:**

We are pleased that paragraph 8.41 refers to UKCP18.

Paragraph 8.44 refers to buildings at risk of flooding through tidal surges and heavy rain. However, this paragraph does not specifically refer to fluvial flood risk. We therefore would require this to be updated accordingly.

Paragraph 8.45 refers to the SFRA. The SFRA is a living document and should be updated when new modelling becomes available.

Change suggested by respondent:

We are pleased that paragraph 8.41 refers to UKCP18.

Paragraph 8.44 refers to buildings at risk of flooding through tidal surges and heavy rain. However, this paragraph does not specifically refer to fluvial flood risk. We therefore would require this to be updated accordingly.

Paragraph 8.45 refers to the SFRA. The SFRA is a living document and should be updated when new modelling becomes available.

Our main comments that need to be actioned relating to the SFRA can be found within our response to policy DM4 - Flood Risk.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

26276

Support

Policy CS11 Gypsy and Traveller Accommodation**Respondent:** Environment Agency**Summary:**

We are pleased to see that paragraph 8.148 refers to caravans, mobile homes and park homes intended for residential use being classified as 'highly vulnerable; and therefore not compatible with Flood Zone 3 and require the exception test in Flood Zone 2.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

26279

Object

Policy DM4 Development and Flood Risk**Respondent:** Environment Agency**Summary:**

At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. Further information can be found below.

Change suggested by respondent:

At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. The Strategic Flood Risk Assessment (SFRA) has not yet been agreed as the River Gipping fluvial model is not yet verified and ready for use. This is because we are still awaiting the final outputs and deliverables for this model. Therefore, there is not currently a reliable evidence base to derive the SFRA and inform the Local Plan. We have and will continue to work in partnership with Ipswich Borough Council on the SFRA. As soon the modelling is completed we will be able to engage further to ensure that the SFRA is finalised and the Local Plan appropriately reflects its findings. A statement of common ground will be prepared if required.

In addition to the above, we have included our comments below on the rest of the Local Plan document. These have been provided in the same format as the Local Plan itself.

In terms of the rest of the policy itself:

Paragraph 9.4.10 needs to make reference to the fact that the SFRA is a living document and is awaiting modelling information to update it.

We fully agree with paragraph 9.4.12 which states that more and less vulnerable development in Flood Zones 2 and 3a may be acceptable but will require Flood Risk Assessments (FRAs) to demonstrate that such developments will be safe.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

26261

Object

Chapter 10 - Implementation**Respondent:** Mr Paul Gilbert**Petition:** 2 petitioners**Summary:**

Table 8B: There is a need for a safer pedestrian and cycle track other than Broad Acres Farm entrance at northern end of Fonnereau Way. Council has failed to assess the needs as current footpath access is unsuitable for a cycle track. We had to negotiate 2 moving cars and a horse being moved on this access. There is no value enjoyment or country feel about walking through someones home. We were told recently that a new pedestrian way and cycle track would be opening on Lower Road, avoiding the farm, using country park. This is a much safer solution.

Change suggested by respondent:

Plan must be altered to show the new safer route through the country park.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26260

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Mr Paul Gilbert**Petition:** 2 petitioners**Summary:**

There is a need for a safer pedestrian and cycle track other than Broad Acres Farm entrance at northern end of Fonnereau Way. Council has failed to assess the needs as the current footpath access is unsuitable for a cycle track. We had to negotiate 2 moving cars and a horse being moved on this access. There is no value enjoyment or country feel about walking through someones home. We were told recently that a new pedestrian way and cycle track would be opening on Lower Road, avoiding the farm, using country park. This is a much safer solution.

Change suggested by respondent:

Plan must be altered to show the new safer route though the country park.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26361

Object

Chapter 4 - The Duty to Co-Operate**Respondent:** Gladman Developments**Summary:**

Whilst collaboration between the IPSA authorities has occurred it has not resulted in effective and concrete outcomes to ensure the housing needs of the HMA will be delivered in full. The Local Plan does not form a strategy that will provide the necessary certainty that is needed to ensure that the minimum housing requirement across the Ipswich Housing Market Area can be achieved in full over the plan period. From the outset of the plan making process, the local authorities within the ISPA have been aware of the issue of unmet needs arising from Ipswich over the plan period.

Change suggested by respondent:

There are practical and sustainable options available to be considered in neighbouring authorities that can accommodate housing needs over the plan period in a sustainable manner, which can support wider infrastructure improvements, including at key junctions on the A14 which is an important cross boundary issue.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

26366

Object

Policy CS1 Sustainable Development**Respondent:** Gladman Developments**Summary:**

The policy should go further in its approach to ensuring the delivery of sustainable development is consistent with a localised approach to assessing development proposals in line with the ethos of achieving the delivery of sustainable development as required by the NPPF2019 which is key to assessing planning proposals and should be reflected in the policy wording linked to the vision and objectives of the Plan. Refer to the Sustainable Development Statement in the draft Durham Local Plan currently subject to examination. It is a local approach to how development proposals will be considered against the NPPF presumption.

Change suggested by respondent:

Gladman refer to the Sustainable Development Statement contained in the draft Durham Local Plan currently subject to examination. This is an effective example of a local approach of how development proposals will be considered against the presumption outlined in national policy. It is recommended that similar criteria that are relevant to Ipswich be included in the policy wording to demonstrate how a localised approach will be taken through the development management process.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

26375

Object

Policy CS2 The Location and Nature of Development**Respondent:** Gladman Developments**Summary:**

The Plan fails to provide a positive and effective mechanism to ensure the delivery of the HMA's housing needs in full. It also relies on the delivery of housing from sites in high risk flood zones. IBC need to identify significantly more sites, which are realistically deliverable and viable. IBC must look outside the Borough's boundary to enable the town's housing need to be met and identify land that is more suitable for residential development. Gladman are promoting land east of Ipswich, within East Suffolk District, for the development of 'Orwell Green Garden Village' and land for a new settlement in Babergh District in a strategic location between Hadleigh and Ipswich.

Change suggested by respondent:

Ipswich Borough Council need to identify significantly more sites, which are realistically deliverable and viable to support the currently identified housing supply. To ensure the Borough's housing need can be met, sites, including realistically deliverable strategic sites, outside of the Borough's boundary, should be identified. Gladman are promoting land to the east of Ipswich, within East Suffolk District, for the development of 'Orwell Green Garden Village' and a potential area of search for a new Garden Village in a strategic location in Babergh between Hadleigh and Ipswich.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26406

Object

Policy CS7 The Amount of Housing Required**Respondent:** Gladman Developments**Summary:**

The Council should plan for a higher level of housing need. The need figure generated by the standard method should only be considered as the minimum starting point. A stepped housing requirement is only appropriate where there is a significant change in the level of housing requirement between plans. Historic delivery does not suggest that the Borough's housing need will be delivered as they are relying on historic sites with known issues as a continuation of the existing spatial strategy. The historic completions data suggests that the stepped housing requirement will continue to delay meeting identified housing needs. Continued reliance on IP-One to deliver homes in Ipswich is unfounded and unrealistic; further distribution across the HMA is required. The Council's housing requirement will fail to meet economic and affordable housing needs. It is not evident which sites within the Council's housing land supply will come forward within the next five years. The rate of delivery at Ipswich Garden Suburb is over estimated. The Council's assumptions made in respect of the housing trajectory risk the deliverability of the Local Plan.

Change suggested by respondent:

The Council could plan for a higher level of housing need than the standard method suggests. The stepped trajectory should be deleted as it delays housing delivery. neither the SHLAA nor the Housing Topic Paper provide the necessary detail on the housing land supply as required by the NPPF. Refer to Lichfields 2016 report and Babergh Mid Suffolk 2019 for evidence of delivery rates at larger sites.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

26411

Object

Policy CS8 Housing Type and Tenure**Respondent:** Gladman Developments**Summary:**

The Self-build/Custom build homes element of the policy lacks clarity on whether self-build plots should be provided on site. The Council's Self Build Register identifies 70 interested persons which does not indicate a strong demand for this form of housing. It is recommended that this element of the policy is modified so it as the discretion of the developer to provide self-build homes on site. Gladman would not support an approach which requires all development to provide Self-build homes as there are potential health and safety concerns and practical difficulties in terms of aligning construction activity on the site.

Change suggested by respondent:

Whilst it supported that the Council should be seeking to encourage the delivery of this form of housing, it is recommended that this element of the policy is modified so it as the discretion of the developer to provide self-build homes on site.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

26415

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Gladman Developments**Summary:**

In principle, Gladman has no objections to the allocation of a new settlement as outlined in the proposed policy wording. However, it is essential that the Council has considered all options available for development and it is essential that realistic delivery assumptions have been applied to the sites delivery. Ipswich Borough has not delivered any large sites comparable to the scale proposed for the Ipswich Garden Suburb. It is clear that realistic assumptions on the delivery of Ipswich Garden Suburb have not been applied.

Change suggested by respondent:

Gladman assert that Ipswich Borough Council need to identify significantly more sites, which are realistically deliverable and viable to support the currently identified housing supply.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

26417

Object

Policy CS12 Affordable Housing**Respondent:** Gladman Developments**Summary:**

The approach is not effective given the level of affordable housing needs within Ipswich will not be met over the plan period. The Council needs to address this situation if it is to meet the housing market areas full housing needs. NPPF p60 is clear that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. The Council must allocate additional housing land to make a meaningful contribution to housing land supply and boost affordable housing delivery.

Change suggested by respondent:

This issue can be addressed through the allocation of sites within the vicinity of Ipswich within neighbouring districts such as the Orwell Green Garden Village.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26418

Object

Policy CS13 Planning for Jobs Growth**Respondent:** Gladman Developments**Summary:**

Policy CS13 seeks to promote sustainable economic growth in the Ipswich Strategy Planning Area. It is noted that the Council has updated its economic evidence as a result of the more recent East England Forecasting Model (EEFM) dataset being published. This has reduced the jobs growth from 15,580 jobs to 9,500 jobs over the plan period. Gladman consider the Plan should be aspirational and should be seeking to increase jobs growth as identified in the preferred options plan as a minimum in order to meet the visions and objectives of the Plan to increase economic activity and access to employment.

Change suggested by respondent:

Gladman consider the Plan should be aspirational and should be seeking to increase jobs growth as identified in the preferred options plan as a minimum in order to meet the visions and objectives of the Plan to increase economic activity and access to employment.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26457

Object

Chapter 4 - The Duty to Co-Operate**Respondent:** Grainger Plc**Summary:**

By virtue of lack of available sites, the draft Plan fails in its Duty to Cooperate with neighbouring planning authorities to identify additional sites resulting in the Plan not being justified or positively prepared as well as being contrary to the legal requirements of the Localism Act 2011

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

26455

Object

Policy ISPA1 Growth in the Ipswich Strategic Planning Area**Respondent:** Grainger Plc**Summary:**

The Plan is ineffective as it does not allocate an adequate number of deliverable sites over the plan period to maintain the housing need of the Borough as a consequence of the 20% buffer now required under the Housing Delivery Test;

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

26456

Object

Policy CS7 The Amount of Housing Required**Respondent:** Grainger Plc**Summary:**

There is a lack of evidence to support the proposed windfall rate which may mean unmet need will increase over the plan period;

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

26272

Object

Policy DM12 Design and Character**Respondent:** Habinteg Housing Association**Summary:**

Strongly support the approach to Part M4(2) accessible and adaptable homes, which ensures that a proportion of new homes will be accessible. However, the plan should use a narrower definition for when the standard may not be applied, which firmly places the burden of proof onto the developer. This will help minimise instances where compliance is argued out during the application process. Ipswich should also set the same requirement for wheelchair user dwellings as the London Plan: 10% of new homes to comply with Part M4(3) Standard (the other 90% to be built to part M4(2) accessible and adaptable standard).

Change suggested by respondent:

Habinteg believe that all new homes should be built to Part M4(2) accessible and adaptable to help meet the national accessible homes deficit. We believe the 'waiver' language should be firmer, so that there is a narrower definition given for when the standard may not be applied. A definition which firmly places the burden of proof onto the developer which will help minimise instances where compliance with the policy is argued out during the planning permission process. Alongside an increased supply of accessible and adaptable homes it is critical that an adequate number of homes are built to Category M4(3) wheelchair user dwelling standard. We would therefore like to see Ipswich set a similar requirement for wheelchair user dwellings as that set down in the London Plan which requires that, 10% of new homes comply with Part M4(3) Standard (the other 90% required to be built to part M4(2) accessible and adaptable standard).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26587

Support

Chapter 4 - The Duty to Co-Operate**Respondent:** Highways England**Agent:** Highways England**Summary:**

Through the process of development of this Plan and those covered by adjacent planning authorities within Ipswich Strategic Planning Area (ISPA), Highways England has worked closely with Suffolk County Council on the development of the evidence base. The modelling work shows that accumulatively growth in ISPA is predicted to pose significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and it is noted that the local authorities across the ISPA agree that robust steps must be taken to prioritise healthy and sustainable travel. Highways England supports this position.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26583

Support

Chapter 8 - The Spatial Strategy of the Core Strategy**Respondent:** Highways England**Agent:** Highways England**Summary:**

In general, Highways England considers that Ipswich Borough Council's consideration of land use policy, the transport evidence to support it and the consequential understanding on the impact of the strategic road network is generally sound and consistent with government policy.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26592

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Highways England**Agent:** Highways England**Summary:**

A14 improvements required to support proposed growth have been identified - consistent with findings of modelling and study work. Plan notes that longer term funding would comprise growth funds, developer funding and monies identified from a future Roads Investment Strategy (RIS). RIS2 hasn't been published so it isn't possible to confirm this, or whether funding would be available from a future RIS. Without robust measures identified by Suffolk County Council, it isn't certain that delivery of the latter stages of the plan can be achieved - vital that a robust manage and monitor approach is maintained throughout the plan period.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26594

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Highways England**Agent:** Highways England**Summary:**

Whilst not part of this Plan, it proposes a longer term aspiration for an Ipswich Northern Bypass which would lie within the East Suffolk Council and Mid Suffolk District Council area. The scheme would improve connectivity between the A14 and A12, reduce pressure on the A14 and improve network resilience, especially to the sections of A14 in the vicinity of the Orwell Bridge and Junction 55 (Copdock). Highways England has no objection in principle however it is noted that Suffolk County Council on 25 February 2020 at a cabinet meeting resolved not to take this scheme forward.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26596

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Highways England**Agent:** Highways England**Summary:**

The Plan aspires for a longer proposal for an east bank link road and a new A14(T) junction could work which would provide increased accessibility and reduce congestion to this area of Ipswich. As stated Highways England are not in favour of the proposals as there is concern with resultant local 'junction hopping' along the A14 which would reduce highway capacity, and more significantly it is considered that there is insufficient geometric capacity to accommodate an additional junctions on this section of the A14.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26589

Support

Policy CS20 Key Transport Proposals**Respondent:** Highways England**Agent:** Highways England**Summary:**

The draft Local Plan identifies a package of transport mitigation measures to reduce vehicle movements and Suffolk County Council as the Highway Authority has developed a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network.

These include:

- Transport infrastructure to encourage and support sustainable modes of transport
- A Bus Quality Partnership
- A Smarter Choices programme
- Review of car parking and pricing strategies
- Review of park and ride strategy
- Junction improvements

Highways England supports this strategy.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

26601

Object

Policy CS20 Key Transport Proposals**Respondent:** Highways England**Agent:** Highways England**Summary:**

Evidence base provides indicative proposals for upgrading junctions along A14 and potentially cost-effective measures for resolving link and junction capacity problems arising from growth. Potential measures include proposals to re-establish Bury Road Park and Ride and provision of a new site in Nacton Road. Consider these are potentially feasible options. However, measures will not address underlining A14 capacity issues. Further measures may be required e.g. variable mandatory speed limits, and substantial improvements at Junction 55 (Copdock). Funding of measures is an issue. At this stage there is no certainty of the availability of future Highways England capital funding programme funding.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26666

Support

Policy CS4 Protecting our Assets**Respondent:** Historic England**Summary:**

We welcome the changes to criterion 3 regarding the Council's commitment to a local list in policy.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Yes**Comply with** Not specified**duty:****Attachments:**

26654

Object

Chapter 6 - Vision and Objectives**Respondent:** Historic England**Summary:**

Under paragraph 35 of the National Planning Policy Framework ('The Framework') we consider that this Plan is unsound as some aspects are not effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. In particular we have recommended the inclusion of specific policy references for heritage assets and identified mitigation within Policies SP2 (Land Allocated for Housing), SP4 (Opportunity Sites), SP5 (Land Allocated for Employment Use), SP11 (The Waterfront), SP12 (Education Quarter), and SP13 (Portman Quarter).

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26661

Object

Chapter 7 - Key Diagram**Respondent:** Historic England**Summary:**

Regarding the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map IP-One Area inset and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas. However, these areas do not match up with illustrative boundaries in The Ipswich Key Diagram. The opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.

Change suggested by respondent:

The opportunity areas need to be clearly defined and labelled on the policies map.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26668

Support

Policy DM13 Built Heritage and Conservation**Respondent:** Historic England**Summary:**

■ We note the changes to this policy following our Regulation 18 advice.

Change suggested by respondent:

■ N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26669

Support

Policy DM14 Archaeology**Respondent:** Historic England**Summary:**

■ We welcome the changes to this policy following our Regulation 18 advice.

Change suggested by respondent:

■ N/A

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26658

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Historic England**Summary:**

Site includes Grade II Listed Everton School Westerfield House, and adjacent to/within the setting of other Grade II Listed buildings (Allens House, and Laceys Farmhouse). Development must preserve and where possible enhance these assets and their settings where this setting contributes to significance. Heritage Impact Assessment required, which must assess the contribution this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove/ mitigate any harm should be included in a site specific policy for ISPA4.1.

Change suggested by respondent:

Heritage Impact Assessment of ISPA4.1 required. Any specific measures required from the assessment then integrated into a site specific policy.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26655

Object

Policy CS2 The Location and Nature of Development**Respondent:** Historic England**Summary:**

Concerned that 'higher density homes' is a synonym for tall buildings/ flats. Appears to be confirmed in final paragraph of Policy. Inference that 'high density' could 'compromise' the historic character of Ipswich, by way of tall buildings affecting the setting of these assets, impacting on their significance. Consider this section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. Should also make clear that good design should not only respect the historic character of an area, but respond to it. High density does not need to take the form of flats, see 'Increasing Residential Density publication (2018).

Change suggested by respondent:

Section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. Should also make clear that good design should not only respect the historic character of an area, but respond to it.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26657

Object

Policy CS3 IP-One Area Action Plan**Respondent:** Historic England**Summary:**

Extremely concerned about the following key aspects:

1. The lack of clarity regarding the status of the IP-One Area Action Plan;
2. The lack of clear delineation of the opportunity areas; and
3. The absence of robust policies for these which in our view renders this aspect of the Plan not effective, and therefore unsound.

See detailed commentary for further explanation of these concerns. Ipswich has a high number of historic assets in the IP-One area and appropriate management of the historic environment will therefore be a significant consideration in the design and deliverability of new development.

Change suggested by respondent:

If the IP-One Area Action Plan has been completed then Policy CS3 and supporting text need to clearly state this. Opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question. Recommended one policy for each opportunity area which specifically sets out the main criteria and parameters for that land. Robust site specific policies will help to articulate the vision for each opportunity area, setting out the means to improve connectivity, legibility, and ones experience of historic places, and help to ensure the key design and heritage principles are employed consistently and to a high quality. Review the wording for policies SP2, SP4, SP5, SP11, SP12, and SP13 identifying which heritage assets (or their settings) would be affected by the proposed development. Elevate the Development Options plans (i.e. those illustrating the development options and design guidelines) from chapter 6 into the policies.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26660

Object

Policy CS3 IP-One Area Action Plan**Respondent:** Historic England**Summary:**

The way the IP-one area action plan is referred to suggests that this work has yet to be completed, and that in due course a new Area Action Plan will be prepared, clarifying the opportunity area boundaries, and setting out detailed policy criteria. However, this is not clear and is confusing and misleading. Concern is that the Plan should be readable and useable for everyone. If the IP-One Area Action Plan has been completed and is incorporated, then Policy and supporting text need to clearly state this. Notwithstanding this, it is our contention that the Council has not followed CS3.

Change suggested by respondent:

Policy requires clarification as to the status of the IP-One Area Action Plan.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26667

Object

Policy DM15 Tall Buildings**Respondent:** Historic England**Summary:**

Support changes to Policy DM15, but request criterion 'i' is amended. Remain concerned that the tall building arc still includes a significant area within the setting of the Grade I Listed Willis Building. One of its most striking features is its curvilinear glass curtain walling that reflects the surrounding buildings. Any new tall building therefore has the potential to impact on the setting, and therefore significance of this important building, and on this basis we advise pulling back the arc boundary in the immediate vicinity. Our Tall buildings advice note provides more information.

Change suggested by respondent:

Amend criterion 'i' as follows; "Preserves strategic and local views, with particular reference to the settings of conservation areas, listed buildings, scheduled monuments, and other heritage assets, and the wooded skyline visible from and towards central Ipswich." Pull back the tall building arc on the IP-One policies map.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26611

Object

Chapter 6 - Vision and Objectives**Respondent:** Councillor Oliver Holmes**Summary:**

To be sound, reference needs to be made to the Government's net zero 2050 policy together with reference to IBC's Climate Emergency Declaration July 2019. This needs to be an overarching policy vision over the whole of the Core Strategy. Failure to do so could make the CS unlawful.

Change suggested by respondent:

Reference needs to be made to the Government's net zero 2050 policy together with reference to IBC's Climate Emergency Declaration July 2019.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26617

Object

Chapter 6 - Vision and Objectives**Respondent:** Councillor Oliver Holmes**Summary:**

Any development in Humber Doucy Lane must not take place until the Garden Suburb is substantially completed. "Appropriately phased" is too open-ended. To be sound, and to enable completion of the Garden Suburb, no development should occur before a trigger point of 3,200 completed homes.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26619

Object

Policy ISPA1 Growth in the Ipswich Strategic Planning Area**Respondent:** Councillor Oliver Holmes**Summary:**

Although improved infrastructure is stated to be essential for sustainable growth, there are no viable transport solutions offered. Such schemes are unlikely to be achievable as planning gain through development. The Draft is therefore unsound and needs to be re-written to include sustainable options.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26620

Object

Policy CS1 Sustainable Development**Respondent:** Councillor Oliver Holmes**Summary:**

This policy needs to be re-written to be compliant with UK Government policy on climate change. Net zero by 2050 is an objective above the NPPF. All development in Ipswich must be at or close to net zero by 2036 otherwise the 2050 target cannot be achieved.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26621

Object

Policy CS5 Improving Accessibility**Respondent:** Councillor Oliver Holmes**Summary:**

Although improving accessibility is recognised, it has to be borne in mind that the vast majority of journeys into and through Ipswich are by car and there is no objective for limiting or reducing car transport. It is entirely likely that accessibility will decrease over the plan period.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26613

Object

Chapter 6 - Vision and Objectives**Respondent:** Councillor Oliver Holmes**Summary:**

Development in itself is unlikely to achieve any reduction in carbon emissions. Objective should be re-written so that permitted development will not add to carbon emissions. To be sound, reference should be made to air quality/pollution and the need for development not to increase poor air quality in existing and potentially new Air Quality Management Areas. Throughout Plan, references made to significant modal shift to achieve sustainability. However, although this has existed for some years, there is no evidence of modal shift. Continued reference to such shift could be seen as disingenuous. Objective needs to provide initiatives/disincentives to developers.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26622

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Councillor Oliver Holmes**Summary:**

Given the percentage of affordable housing in existing permissions of 5% and 4% for nearly 2000 houses, a target of 31% for the whole site of 3500 dwellings is not achievable. A more realistic percentage needs to be given.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26625

Object

Policy CS17 Delivering Infrastructure**Respondent:** Councillor Oliver Holmes**Summary:**

Financing infrastructure through developer contributions is difficult in Ipswich as net profit margins are low and contributions are challenged by developers on viability grounds. For example, Ipswich Garden Suburb required a grant of £9.8 million from the Housing Infrastructure Fund in order to proceed. The Draft needs to reflect this difficulty otherwise it is unsound.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26628

Object

Policy DM1 Sustainable Construction**Respondent:** Councillor Oliver Holmes**Summary:**

To be sound, this policy needs to be re-written to take account of the national zero carbon target of 2050. Although carbon for new builds will be less than under previous standards, the level of emissions under this policy will still increase during the plan period. The default position should be zero carbon.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26634

Object

Policy DM16 Extension to Dwellings and the Provision of Ancillary Buildings**Respondent:** Councillor Oliver Holmes**Summary:**

This Policy needs to include a reference to zero carbon to take account of the national zero carbon target of 2050.

Change suggested by respondent:

Needs to include a reference to zero carbon

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26624

Object

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Councillor Oliver Holmes**Summary:**

Problem exists within Ipswich over sports grounds - illustrated by grant of planning permission for residential development at Ipswich Sports Club in Henley Road. Hockey pitch deemed inadequate and relocated elsewhere enabling potential development to proceed. Although there could be shown at that particular time that the pitch wasn't needed, this facility was lost in perpetuity. Needs and fashions for sport facilities change over time, but, once land is lost, there is no flexibility. Assessing Green Infrastructure, Sport and Recreation need should take account of future residents and changing desires/habits of the residents over time. The Draft doesn't do this.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26627

Object

Policy CS20 Key Transport Proposals**Respondent:** Councillor Oliver Holmes**Summary:**

Transport is an area of weakness. Upper Orwell Crossings and Ipswich Northern Route were abandoned by SCC. No evidence that Suffolk will provide any major infrastructure during plan period. In these circumstances, all development in Ipswich will add to existing congestion with no reductions in carbon and an increase in pollution and AQMAs. Makes Draft unsound on a fundamental level. Argument can be made that no major development should take place which would increase traffic until an effective town wide mitigation strategy is in place. Reference to Park and Ride schemes aspirational. No evidence SCC or IBC will fund them.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26631

Object

Policy DM2 Decentralised Renewable or Low Carbon Energy**Respondent:** Councillor Oliver Holmes**Summary:**

This policy should apply to all new build and not just 10+ residential or 1000sqm + commercial. A 15% target is unlikely to be lawful under the net zero 2050 national objective and should be increased. It also fails to take into account national policy on prohibiting gas boilers after 2025. Extensions to residential property (including permitted development) will need to be compliant. The policy should make it clear that permission will be refused unless it is compliant.

Change suggested by respondent:

Policy should apply to all new build and not just 10+ residential or 1000sqm + commercial. % needs to be higher than 15%.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26633

Object

Policy DM3 Air Quality**Respondent:** Councillor Oliver Holmes**Summary:**

Poor air quality in the five AQMAs in Ipswich is a result of road traffic – particularly NO₂ and NO_X. Mitigation needs to include a restriction on operational parking in commercial development. All new residential development needs to include significant contributions towards sustainable transport options. The previous draft mentioned that modelling showed emissions in AQMAs were likely to increase and more AQMAs declared during the plan period. This cannot be allowed to happen.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26329

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

It would appear from the Council's evidence that they have co-operated effectively with neighbouring authorities to plan for housing needs across the ISPA. Growth expectations are set out in ISPA1 and we agree that the minimum number of homes to be delivered in the areas is circa 35,000 between 2018-2036. However, we cannot comment on whether this has translated into effective joint working regarding the cross-border infrastructure and sites issues set out in ISPA2 and ISPA3. It will be important that the Council can show that the cross-boundary issues concerning the deliverability of those sites in ISPA4 which will meet a considerable portion of the ISPA's housing needs will be addressed by the Council and the relevant agencies.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26304

Object

Policy CS1 Sustainable Development**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

The policy is unsound as it not consistent with national policy. When the presumption in favour of sustainable development was first introduced the Planning Inspectorate recommended that a policy reflecting this approach should be included in all local plans. This approach is no longer considered necessary by PINS and they have rescinded their original advice on this matter. Given this position and the fact that paragraph 16(f) of the National Planning Policy Framework (NPPF) states that policies in local plans should serve a clear purpose and avoid any unnecessary duplication we would suggest this policy is deleted.

Change suggested by respondent:

We would suggest this policy is deleted.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26311

Object

Policy CS7 The Amount of Housing Required**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

Housing supply -

The HBF welcome the decision to include a 10% contingency within the Council's housing supply.

It is not evident which sites form the basis of supply within the first five years of the plan.

It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period.

This is particularly important with regard to the five year supply given the amended definition of deliverable within the 2019 NPPF.

Until such evidence is provided the HBF reserve the right to comment on this issue.

Change suggested by respondent:

In order to make the plan sound the Council will need to provide evidence as to the delivery rates for specific allocations and other sources of housing supply within the local plan to ensure these can be scrutinised.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26313

Object

Policy CS7 The Amount of Housing Required**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

Stepped requirement - Policy is not sound, the stepped trajectory has not been justified. Agree with the proposed requirement for the plan period, however do not agree with the steps proposed. In too many cases the step is required on the basis of the strategy chosen by the Council. The approach is not sufficiently challenging and is more likely to lead to the whole plan under delivering. We would suggest:

2018/19 to 2019/20 - 300

2020/21 to 2023/24 - 375

2024/25 to 2035/36 - 493

This would ensure the Council can maintain a five year supply on adoption.

Change suggested by respondent:

In order to make the plan sound the Council will need to set a more challenging stepped trajectory that is more closely linked to expected supply.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26315

Object

Policy CS7 The Amount of Housing Required**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

Housing requirement - Policy not sound the housing requirement has not been justified. Paragraph 2a-024 of the PPG states that an increase in the total housing figures may be considered where it could help deliver affordable housing. The Council recognise in paragraph 8.151 affordable housing need is 239 dpa, around 48% of their requirement and as such they will not meet all of their need for affordable housing. Consideration should have been given with the other authorities in the ISPA whether more sites could be allocated elsewhere in the ISPA to meet the affordable housing needs of Ipswich.

Change suggested by respondent:

In order to make the plan sound the Council will need to justify why they have not considered a higher housing requirement that better meets their jobs growth assessments and affordable housing needs. Whilst we recognise that Ipswich is constrained the Council should have looked to secure additional provision within neighbouring areas

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26323

Object

Policy CS7 The Amount of Housing Required**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

Housing requirement - Policy not sound the housing requirement has not been justified. The HBF is concerned that the desire for growth is not being matched by the Council's decision to adopt a housing requirement that is below previous assessment of need with regard to economic growth. The implicit suggestion would appear to be that any additional growth required will be covered by additional delivery elsewhere in the ISPA. However, there does not appear to be any assessment as to whether this will be sufficient and provided in appropriate locations to support the economic and jobs growth aspirations of Ipswich.

Change suggested by respondent:

In order to make the plan sound the Council will need to justify why they have not considered a higher housing requirement that better meets their jobs growth assessments and affordable housing needs. Whilst we recognise that Ipswich is constrained the Council should have looked to secure additional provision within neighbouring areas.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26303

Object

Policy CS12 Affordable Housing**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

CS12 is unsound and not consistent with national policy. The phrase 'at least 15%' does not provide the necessary clarity for applicants and decision makers and should be removed.

Change suggested by respondent:

The phrase 'at least' should be removed from the policy.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26350

Object

Policy CS12 Affordable Housing**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

CS12 is unsound and not consistent with national policy. The viability assessment may have underestimated the level of abnormal costs that occur when developing brownfield sites. Given that the Viability Assessment shows that development of brownfield land is marginal the Council may need to consider a lower affordable housing requirement on such sites, or amend other policy requirements in the plan.

Change suggested by respondent:

Consider a lower affordable housing requirement on brownfield sites or amend other policy requirements in the plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26299

Object

Policy DM7 Provision of Private Outdoor Amenity Space and New and Existing Developments**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

DM7 is unsound as it not consistent with national policy or justified. This policy is too prescriptive as to the levels of open space required for homes within Ipswich. Housebuilders understand the market and the amount of open space that people expect and as such this policy needs to provide a greater flexibility. Ipswich is highly constrained and if the Council is seeking to set standards for open space within developments and meet its housing requirements it will need to offer flexibility.

Change suggested by respondent:

We would suggest the following wording: "To ensure that new residential developments deliver a high quality and environmentally sustainable living environment, developments for houses and ground floor maisonettes will be required to incorporate well-designed and located private outdoor amenity space of an appropriate type and amount. When considering the provision of outdoor amenity space applicants should have regard to the need to meet other density and urban design requirements of the plan.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26295

Object

Policy DM21 Transport and Access in New Developments**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

HBF would prefer a national and standardised approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy.

Change suggested by respondent:

Suggest that part c is deleted.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26355

Object

Policy DM21 Transport and Access in New Developments**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

Part c is unsound as it is not justified.

Issues with the policy -

Lacks clarity, as it does not state the amount of charging points to be provided.

Needs to specify the quantum and type of provision sought.

Policy should be supported by evidence demonstrating technical feasibility and financial viability, including confirmation of engagement with the main energy suppliers to determine network capacity.

Change suggested by respondent:

Without the necessary justification and clarity, we would suggest that part c is deleted.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26293

Object

Policy DM22 Car and Cycle Parking in New Development**Respondent:** Home Builders Federation Ltd (HBF)**Agent:** Home Builders Federation Ltd (HBF)**Summary:**

Policy unsound and not consistent with national policy. DM22 requires compliance with adopted standards for car and cycle parking. However, these standards are not set out in the local plan but in supplementary guidance. We are concerned that such standards, which are issues of policy as they can be used to refuse an application, being set out in guidance and not the plan itself. Legislation is clear that policy issues must be set out in local plans. This is to ensure that should these standards change then appropriate consultation and public scrutiny of these changes is undertaken.

Change suggested by respondent:

Two options are open to the Council, they can either include the standards as an appendix in the local plan or state in policy that development will need to have regard to the standards.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26230

Support

Chapter 2 - The Planning System

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

It is also important we continue to be consulted in relation to emerging Neighbourhood Development Plans in order to work with local communities to deliver and maintain sustainable healthcare.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26222

Support

Chapter 4 - The Duty to Co-Operate

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

It is important to remember that improved or newly created infrastructure, alone, will not fully mitigate the impact of development growth. Resource and revenue implications provide a very significant risk to the delivery of primary care services and we should continue to work together to identify ways in which sustainable health care services can be delivered and how development can contribute to healthy communities and the training and recruitment of health care professionals.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26225

Support

Chapter 5 - Ipswich - The Place**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

Paragraph 5.4 (deprivation issues) - Health care providers in areas of deprivation are under more pressure than those in areas where deprivation is lower. Due to the extra strain put on health providers in areas of high deprivation, morale and recruitment is lower than areas where the level of deprivation is less. Tackling areas of the highest levels of deprivation must be seen as a priority going forward as the resources required to provide health care in these areas is currently unsustainable.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26226

Support

Chapter 5 - Ipswich - The Place**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

Paragraph 5.25 (travel demands from growth) - It is good to see that the benefits of health and wellbeing are being considered in initiatives not intrinsically linked to health. Creating a safe and sustainable link between new developments and areas of commerce and community is essential, be it via a well-lit walking path, cycle path or green corridors. The benefits to resident's wellbeing should not be overlooked as linking people that would otherwise be isolated can have a major benefit to mental health.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26227

Support

Chapter 5 - Ipswich - The Place

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

Paragraph 5.26 (Health and Wellbeing) - We aim to provide health care facilities in a timely manner that is in line with the growth. The physical building of a health and/or social facility or improving one is relatively acquirable in most circumstances but there is currently a national shortage of NHS staff in both primary care and secondary care causing capacity issues. LPAs can help aid recruitment by providing local communities that will attract NHS staff to them, by producing key worker housing in and around NHS campuses and facilities, encouraging commerce, designing and creating a vibrant and attractive community.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26205

Object

Chapter 6 - Vision and Objectives

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

IBC healthcare provision equals 13 GP's, 2 branch surgeries, 36 pharmacists, 26 dental surgeries, 20 opticians, 1 Acute hospital and 6 clinics. The CCG, Local Authorities and local stakeholders has started addressing Primary Care capacity issues. These projects will deliver additional capacity to meet previously identified growth. Upon review some existing health infrastructure will require further investment/ improvement to meet the needs of growth in this LP. Growth would have an impact on healthcare provision which, if unmitigated, may not be sustainable. Provision needed to address development impact on health infrastructure and ensure timely cost-effective delivery of necessary infrastructure improvements.

Change suggested by respondent:

Implement recommendations set out in letter dated 18/02/2020.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26228

Support

Chapter 6 - Vision and Objectives

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

Objective 10 - The CCG is undergoing a data gathering exercise for all primary care facilities in Suffolk with the aim of providing a 6-facet survey. The outcome of this project will be reliable data showing the CCG the general physical condition of all primary care facilities. Once this information is known the CCG will be in a better position to know which facilities require improvement and which facilities are in good condition.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26206

Support

Policy ISPA2 Strategic Infrastructure Priorities

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

The CCG is very happy to see that health provision is identified as key infrastructure and will work with the council and alliance partners in providing holistic healthcare for the residents of Ipswich.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26208

Support

Policy CS2 The Location and Nature of Development

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

Designing developments in such a way that encourages the use of more sustainable modes of transport to get to community infrastructure is welcome and will help in the NHS preventative aspirations being obtained.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26212

Support

Policy CS11 Gypsy and Traveller Accommodation

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

The CCG will be happy to be involved in any proposed gypsy and traveller site discussions to ensure that the residents will be able to access primary care.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26231

Object

Chapter 8 - The Spatial Strategy of the Core Strategy

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

NHS England and CCG have requested that IBC identifies policies and strategies that directly or indirectly impact upon healthcare provision and has responded with comments. Shortfalls identified in capacity at existing premises. Provision required within the LP to address impacts of development on health infrastructure and to ensure timely cost-effective delivery of necessary infrastructure improvements, in the interests of pursuing sustainable development. The recommendations set out are those deemed appropriate having regard to the projected needs arising from the LP. However, if the recommendations are not implemented, we reserve the right to make representations about soundness at relevant junctures.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26223

Object

Chapter 10 - Implementation

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

Table 8B: "District & Local Centres including community buildings with integrated library facilities & police office (where required) alongside new health centre & reserved sites for community use."

NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Mitigation for the increase in patients from the proposed Ipswich Garden Suburb will be spread between Two Rivers Medical Practice and the new healthcare facility at Tooks.

Change suggested by respondent:

Replace row in table 8B with recommendation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26213

Support

Policy CS16 Green Infrastructure, Sport and Recreation

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26218

Support

Policy DM5 Protection of Open Spaces, Sport and Recreation

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26207

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

The agreement to work with ESC supported. Development near Humber Doucy Lane is within the catchment of Two Rivers Medical Centre and primary care provision would likely be prescribed here. However, the possibility of issues arising from developments near to local authority boundaries regarding healthcare provision is prevalent. The developments of IGS, continued development of Ravenswood and Whitton are examples of possible cross-boundary developments. Communication/ cooperation will be vital in making sure that appropriate stakeholders are aware and mitigation is sought in a timely manner. Make sure that the land North of Ipswich is accounted for in mitigating health.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26209

Support

Policy CS5 Improving Accessibility**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

The accessibility of infrastructure is a key factor in designing a development that is aimed at meeting environmental and health objectives. Despite the desire to have all community infrastructure within easily accessible locations, it might not always be possible for health but this does not mean that community space could not be accessible to provide community healthcare services on an ad hoc basis.

Change suggested by respondent:

N/A

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

26210

Support

Policy CS8 Housing Type and Tenure**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

The CCG and Alliance partners are willing to be involved in any discussions involving assisted living and residential care homes. This area of development puts strain on all healthcare providers and being involved in discussions from the earliest stage possible will help primary, secondary, community and mental health care mitigate the impact.

The provision of assisted living developments and residential care homes, although a necessary feature of care provision and welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage early with the CCG, to plan and implement suitable mitigations.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26211

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Despite the relatively large size of the garden suburb development, primary care will be provided for the new patients at both Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site. Community health services might be provided closer to the development but discussions would need to be had with the Alliance partners.

Change suggested by respondent:

Remove "healthcare provision" from policy wording for the district centre element and update to reflect the absorption of capacity at Tooks/ Two Rivers Medical Centres.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26214

Support

Policy CS17 Delivering Infrastructure**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

S106 is very important when providing health infrastructure and up until recent this has just been accessible to primary care providers through the CCG. NHS England has now provided instructions that all health providers should be looking to request mitigation through S106 or CIL as part of the planning application response process. As part of this process, developments over 250 dwellings will automatically go to the Alliance partners in health for them to make representation and request mitigation. The inclusion of GP surgeries and health centres as key strategic infrastructure is to be commended as this will allow the CCG to strategically plan ahead with the understanding that providing the business case is sustainable it will more likely get approval.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26215

Object

Policy CS19 Provision of Health Services**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

Welcome support of primary care infrastructure and will always provide facilities that meets the needs of patients but policy of building near the town centre, district or local centre will be difficult. Surgeries have catchment areas and these might conflict with district or local centres. Primary Care Networks (PCNs) are being introduced to provide a variety of services through surgeries working together and this could influence the location of any new health facility. The OPE platform is available to make sure that all public buildings are fully utilised. Feasibility studies are being produced to find an estate strategy for Ipswich.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26219

Support

Policy DM6 Provision of New Open Spaces, Sport and Recreational Facilities**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

The proposal to request non-residential developments of 1000 sq. m floor space or more to include facilities for employees is to be applauded. The NHS is looking at preventative measures to reduce the number of people requiring medical help and initiatives like this will help to promote health and wellbeing.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26220

Support

Policy DM12 Design and Character**Respondent:** Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG**Summary:**

Designs that have a multi-functional use in a commercial or community building could help provide the flexibility required to deal with future demand whichever form this might evolve. NHS organisations are beginning to design buildings with this multi-functionality in mind so that rooms can be accessed by multiple organisations, each performing a different service. The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26221

Support

Policy DM24 Protection and Provision of Community Facilities

Respondent: Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG

Summary:

The CCG along with Ipswich Borough Council will be looking at short term, medium term and long term strategies for primary care. As part of this, the aim is for all of the health providers in the area of Ipswich to provide an Infrastructure Delivery Plan (IDP). This document will allow all of the interested parties to work cohesively in identifying land and properties that are surplus to requirements and contrarily, if land acquisition could be required. This close working relationship will be key in this process working as effectively as it possibly can going forward.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26246

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites

Respondent: Ipswich Rugby Football Club (Ipswich RFC)

Summary:

Ipswich RFC serves the local rugby playing community and has a requirement for extra land to meet the demands for it. Land at Humber Doucy Lane adjacent to IP184b is currently leased to meet demand but more space needed. We do not wish to be omitted from any land allocation as the funds realised by land sale could greatly assist the club in better meeting demands. We are also seeking to expand our offering if larger replacement playing facilities adjacent to current pitches are made available or a new site identified. Site IP184b should be included within the ISPA4.1 allocation.

Change suggested by respondent:

Include site IP184b in the ISPA4.1 allocation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26588

Object

Chapter 7 - Key Diagram**Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "Land Allocated for Sport Use" on the basis that it is not required for this purpose. The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement playing fields within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre. It is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings). Please see accompanying letter for further details.

Change suggested by respondent:

Allocate site for residential development (21.81ha, with capacity for 500 dwellings) and not sports use.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26629

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative reference to allocation of land west of Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily involving cross boundary working given containment within Ipswich Borough.

Land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

See accompanying letter for details.

Change suggested by respondent:

Allocate land west of Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings) instead of Humber Doucy Lane (ISPA4.1).

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26623

Object

Policy CS2 The Location and Nature of Development**Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2(b), suggest alternative reference to allocation of land off Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings).

This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

See accompanying letter for details.

Change suggested by respondent:

Land should be allocated at land off Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings) instead of Humber Doucy Lane (ISPA4.1).

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26626

Object

Policy CS7 The Amount of Housing Required**Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Object to omission of reference to the need for inclusion of a 20% buffer to the 5 Year Housing Supply, given latest HDT; to the need to address the emerging delivery shortfall in this regard (77 dwellings within year 1); and need for increased focus on identification of sites that are deliverable in the initial 5 years.

The allocated sites component of housing supply should be increased on the basis that not all of the sites will be delivered within the Plan Period, a proportion have been allocated since 1997, others are reliant on relocation of existing uses. See accompanying letter for details.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26438

Object

Chapter 6 - Vision and Objectives**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Whilst strongly support residential allocation for land at Humber Doucy Lane, seeking relatively minor amendments to detailed wording which is considered neither justified nor effective and therefore not sound. This will ensure no unnecessary delays to delivery of development. As currently written, the Plan identifies the land for "future" development and states that it will be "appropriately phased" with Garden Suburb and associated infrastructure. Amend to provide greater clarity regarding required infrastructure. Plan should not make generic references to "future" development or refer to requirement for phasing without appropriate evidence/details. Wording of paragraph 6.17 should be amended to reflect this.

Change suggested by respondent:

Paragraph 6.17 should be amended to read:

"...A cross-border allocation for development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, is also identified in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road..."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26439

Object

Chapter 7 - Key Diagram**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Whilst strongly support allocation of land at Humber Doucy Lane, seeking relatively minor amendments to wording which is considered neither justified nor effective and therefore not sound. This will ensure no unnecessary delays to delivery of development. As currently written, the Plan identifies the land for "future" development and states that it will be "appropriately phased" with Garden Suburb and associated infrastructure. Amend to provide greater clarity regarding required infrastructure. Plan should not make generic references to "future" development or refer to requirement for phasing without appropriate evidence/details. Wording of paragraph 7.2 should be amended to reflect this.

Change suggested by respondent:

Paragraph 7.2 should be amended to read:

"...(iv) The cross-border allocation for development proposed at the northern end of Humber Doucy Lane through policy ISPA4;..."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26440

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Policy comments on location of green infrastructure - KCL has additional land in vicinity so may be possible to locate outside of allocated site. Limiting green infrastructure to within allocation overly restrictive, therefore not effective or sound. Policy outlines affordable housing requirements - whilst provision supported in principle, Council must ensure viability. Plan identifies 15% requirement with exception of land at Humber Doucy Lane and IGS where at least 30%/31% is required. Whole Plan Viability Study calculations don't include Section 106 and CIL - query whether full infrastructure costs considered. Suggest further flexibility should be applied. Recommend policy wording change.

Change suggested by respondent:

Policy ISPA4 should be amended to read:

"Ipswich Borough Council will work with neighboring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner. In order to meet housing needs within the Borough boundary as far as possible, the Council identifies cross-border allocation for development of 23.62ha of land within Ipswich Borough in 4 parcels forming ISPA4.1 for housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. The allocation is shown on the accompanying site sheet for this policy. It will require land and infrastructure works and green infrastructure (including Suitable Accessible Natural Greenspace) on both sides of the Borough boundary in order to come forward, however this could include land outside the allocated site.....Development will include at least 30% affordable housing, subject to viability testing at the planning application stage...."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26441

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Paragraph 8.28 refers to transport mitigation measures required for the development of the site at Humber Doucy Lane being "challenging". This is not considered to be the case. Re-iterate earlier submissions in relation to accessibility of the site:

- Good public transport accessibility;
- Good road access;
- Good accessibility to services and facilities;
- Town centre and hospital easily accessed by public transport;
- Development of site promotes sustainable transport in accordance with NPPF;
- Transport Modelling Report concludes housing growth can be accommodated;
- Proposals will not influence northern bypass route.

Current reference to "challenging" transport mitigation measures not justified. Recommend amendment to paragraph 8.28.

Change suggested by respondent:

Paragraph 8.28 should be amended to read:

"The site allocation at the northern end of Humber Doucy Lane is located at the edge of Ipswich approximately 3.5km from the town centre. Sustainable transport connections will be key to providing linkage to employment and other opportunities. In addition, it is acknowledged that transport mitigation measures are required for the development of the site and it is essential that significant modal shift is delivered through strong travel plans and other sustainable measures"

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26442

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Plan identifies requirement for sites to provide 15% affordable housing, with the exception of Humber Doucy Lane and IGS where 30/31% required respectively. Calculations for Humber Doucy Lane from assessment of affordable housing provision in The Whole Plan Viability Study, don't include section 106/CIL - query whether full infrastructure costs considered. After testing, first IGS neighbourhoods have been agreed with 4/5% provision instead. Therefore, suggest further flexibility applied to this policy. Whilst support provision of affordable housing, more detailed viability testing may be required to ensure site is viable with regard to all infrastructure costs. Recommend amendment to paragraph 8.29.

Change suggested by respondent:

Paragraph 8.29 should be amended to read:

"The Council will outline expected infrastructure provision of both green infrastructure and built infrastructure required as part of the joint agreed master-planning process to the cross-border Humber Doucy Lane sites. the Whole Plan Viability Assessment of the Local Plan identifies that this area of land falls within a high value zone and indicates that approximately 30% affordable housing could be achieved on a greenfield development, however this will be subject to further testing at the planning application stage. The level of affordable housing also broadly aligns with the Suffolk Coastal Local Plan affordable housing requirement of 33%"

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26448

Object

Policy CS2 The Location and Nature of Development**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Policy comments on the location of green infrastructure. It should be noted that KCL has additional land in the vicinity of the Humber Doucy Lane site allocation so it may be possible to locate these uses outside the site. Therefore, seek flexibility to policy wording to ensure the most appropriate option can be pursued. Limiting green infrastructure to the application site is overly restrictive at this stage and does not enable options to be fully explored. This approach is not effective and therefore does not comply with the tests of soundness. Recommend amendment to policy wording.

Change suggested by respondent:

Policy CS2 should be amended to read:

"b. Allocating sites for development at the northern end of Humber Doucy Lane for housing and associated infrastructure and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4)..."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26451

Object

Policy CS2 The Location and Nature of Development**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Although we generally support the Plan, it's policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details. Recommend amendment to paragraph 8.55 wording.

Change suggested by respondent:

The final bullet point of paragraph 8.55 should be amended to read:

"Lower density housing development is to be master planned jointly with East Suffolk Council at the northern end of Humber Doucy Lane, which will maintain and ensure separation between Ipswich and surrounding settlements"

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26452

Object

Policy CS7 The Amount of Housing Required**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Although we generally support the Plan, it's policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details. Recommend amendment to policy wording.

Change suggested by respondent:

Policy CS7 should be amended to read:

"....c. ...Delivery will also take place at the northern end of Humber Doucy Lane."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26189

Object

Chapter 10 - Implementation**Respondent:** Mr & Mrs Fred Lewis**Petition:** 2 petitioners**Summary:**

Table 8B: Held up for over 20 minutes on our walk at the northern section of the so called Fonnereau Way while a lorry was unloading. This road is not safe for pedestrians. This is contrary to the Design and Access Statement which states uses must be compatible with each other. Figure 1 does not take into account moving lorries and vehicles. Figure 2 (orange line) however indicates the new position for this so called Fonnereau Way which will avoid potential danger.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26188

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Mr & Mrs Fred Lewis**Petition:** 2 petitioners**Summary:**

Held up for over 20 minutes on our walk at the northern section of the so called Fonnereau Way while a lorry was unloading. This road is not safe for pedestrians. This is contrary to the Design and Access Statement which states uses must be compatible with each other. Figure 1 does not take into account moving lorries and vehicles. Figure 2 (orange line) however indicates the new position for this so called Fonnereau Way which will avoid potential danger.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26310

Object

Policy CS8 Housing Type and Tenure**Respondent:** Councillor Timothy Lockington**Summary:**

National guidance outlines needs of independent older people and provision of suitable/specialised homes to support continuing independence. Guidance not reflected in draft framework which references projected over-provision of advanced accommodation (185 Class C3b dwellings). 57.8% projected increase in over 65s not addressed. Housing need for older people that are more able not discussed. Current Ipswich housing stock poorly accessible/adaptable. Current trends - modification of bungalows and predominance of 2/3 storey new builds - are unhelpful. No indication by developers of intention to provide appropriate older age accommodation at Northern Fringe. Request that inspector reflects on guidance and recommends adjustments.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26548

Object

Policy CS4 Protecting our Assets**Respondent:** Marine Management Organisation**Agent:** Marine Management Organisation**Summary:**

Section 8.78 refers to the South East Inshore Marine Plan. This is currently out for consultation and as such is now a document for material consideration. Recommend the draft South East Marine Plan mentioned here. Previous engagement periods were not formal consultation. Only one plan for the South East area, not an inshore and offshore plan as there is for other areas. The East Inshore and East Offshore Marine Plans were adopted in 2014, which covers the adjacent areas, and the north bank of the Orwell. Ensure correct reference to the South East and East marine plan areas where included.

Change suggested by respondent:

Ensure correct terminology with reference to the draft South East Marine Plan and The East Inshore and East Offshore Marine Plans.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26201

Object

Chapter 5 - Ipswich - The Place**Respondent:** Mrs Andrea McDonald**Summary:**

Table 2 - I do not understand why "cheap car parking" is listed alongside walking/cycling routes and public transport. This would encourage more driving therefore more air pollution.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26204**Object**

Plan 6 Green Corridors**Respondent:** Mrs Andrea McDonald**Summary:**

Can only see arrows pointing towards parks/green areas, however not interconnected. No coherent walking or cycling route.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26202**Object**

Policy DM10 Green Corridors**Respondent:** Mrs Andrea McDonald**Summary:**

Can only see arrows pointing towards parks/green areas, however not interconnected. No coherent walking or cycling route.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26330

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Mersea Homes Limited**Agent:** Mersea Homes Limited**Summary:**

Mersea Homes Ltd are broadly supportive of Policy CS10 and its various provisions, but in order to ensure effective delivery, there are three aspects of the policy that are considered to be unsound, as follows:

1. Elements of the detailed wording of the policy in relation to site specific matters and the role of the SPD, which relate to Effectiveness;
2. The Affordable Housing provisions, which relate to soundness issues in respect of the justification and the effectiveness of the Policy;
3. The wording of the Policy in respect of viability review provisions.

Change suggested by respondent:

Please see full representation text for proposed amendments.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26309

Object

Policy CS15 Education Provision**Respondent:** Mersea Homes Limited**Agent:** Mersea Homes Limited**Summary:**

The secondary school site at the Ipswich Garden Suburb should be referenced in the same way as primary school sites i.e. as a broad location (or, as per our representations to the Policies Map, all allocations within the IGS should be removed).

Change suggested by respondent:

Please see full representation text for proposed amendments.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26308**Object**

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Mersea Homes Limited**Agent:** Mersea Homes Limited**Summary:**

The policy needs to be clear that new development should meet the needs arising from that development, having regard to the Council's standards, and should not be required to remedy existing deficits.

Change suggested by respondent:

Please see full representation text for suggested amendments.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26307**Object**

Policy DM21 Transport and Access in New Developments**Respondent:** Mersea Homes Limited**Agent:** Mersea Homes Limited**Summary:**

Whilst no objections are raised in respect of the majority of the provisions of this policy, we are concerned that a requirement that all new development should have access to public transport within 400m is neither justified (in terms of its being a fixed requirement) nor likely to mean that the Plan is effective overall in delivering the number of new homes required, because there are some locations where a strict adherence to 400m is unlikely to be achievable.

Change suggested by respondent:

Please see full representation text for proposed changes.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26306

Object

Policy DM23 The Density of Residential Development**Respondent:** Mersea Homes Limited**Agent:** Mersea Homes Limited**Summary:**

Part (c) of the policy as drafted would not be effective as there is no practical means for ensuring an average of 35 dph across multiple sites, and no justification for stipulating 35 dph on any particular individual site, and no justification for "low-density development" per se.

Change suggested by respondent:

Please see full representation text for amendments.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26200

Support

Chapter 6 - Vision and Objectives**Respondent:** National Grid**Agent:** Avison Young**Summary:**

We have reviewed the document and can confirm that National Grid has no comments to make in response to this consultation.

Change suggested by respondent:

N/A.

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

26289

Support

Chapter 6 - Vision and Objectives**Respondent:** Natural England**Agent:** Natural England**Summary:**

Natural England is satisfied that our recommendations at earlier stages in the Local Plan process have been taken into account within the Ipswich Local Plan final draft. Natural England considers the approach taken with regards to the natural environment to be sound (in accordance with our remit) within the Ipswich Local Plan final draft.

Change suggested by respondent:

N/A.

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26544

Support

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Network Rail**Agent:** Network Rail**Summary:**

It is encouraging to see that Network Rail is mentioned in Policy ISPA2 Strategic Infrastructure Priorities as a working partner of Ipswich Borough Council to enable the delivery of key infrastructure projects.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26546

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Network Rail**Agent:** Network Rail**Summary:**

Network Rail have previously responded to planning applications in relation to Policy CS10 Ipswich Garden Suburb, where we have requested further information and mitigation measures in relation to the potential impacts on the Westerfield Level Crossing. We would actively encourage early engagement on strategic development sites to ensure all impacts are identified and taken into consideration at the masterplan stage. This is especially important in the context of Policy CS17 Delivering Infrastructure, where developments will be required to meet the on and off site infrastructure requirements and Policy CS20: Key Transport Proposals.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26545

Support

Policy CS5 Improving Accessibility**Respondent:** Network Rail**Agent:** Network Rail**Summary:**

We support Policy CS5 in relation to Improving Accessibility and agree that inclusive transport infrastructure should be a priority. This will be especially important with the population increase in the local area that would be generated by the growth in local economy and new housing outlined in Policy CS7 The Amount of Housing Required.

Change suggested by respondent:

N/A

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

26498

Object

Chapter 6 - Vision and Objectives**Respondent:** Northern Fringe Protection Group**Summary:**

Objectives 4 and 9; At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency. The CS needs to be updated to incorporate this to be sound.

Change suggested by respondent:

The Climate Emergency needs to be incorporated into the CS to the sound.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26508

Object

Chapter 5 - Ipswich - The Place**Respondent:** Northern Fringe Protection Group**Summary:**

5.25; Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge. IBC should be "delivering high levels of modal shift" rather than just "guiding as many trips as possible to sustainable modes" .Meeting the Climate Emergency needs to be added as a key challenge.

5.26 - table 2 - There are inconsistent references throughout the document (6.16, IBC FRA webpage, 8.45, 8.46, 8.225, DM4 PRFA). The situation regarding flood risk assessment within the CS is confusing and makes flood risk impossible to understand for the general public. Requires further clarification.

Change suggested by respondent:

The situation regarding flood risk assessment within the CS is confusing and makes flood risk impossible to understand for the general public. Requires further clarification.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26493

Object

Chapter 6 - Vision and Objectives**Respondent:** Northern Fringe Protection Group**Summary:**

Objective 6:

1. Junctions/ link roads at/near capacity, not addressed. No evidence growth is sound.
2. Severe capacity issues in 2026 but no infrastructure projects in Infrastructure Tables. Especially town centre, Ipswich Garden Suburb and A1214.
3. Modelling fails to identify when junctions will reach capacity.
4. Failing to Improve Access in breach of CS5. Modal Shift assumptions too high, uncompliant with CS20.
5. CCC assumes 10% modal shift by 2050. No evidence 15% modal shift deliverable by 2026? CCC assumption should be used.
6. Existing walking/ cycling infrastructure substandard, won't enable delivery of modal shift. Need new cycling indicator.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26496

Object

Chapter 6 - Vision and Objectives**Respondent:** Northern Fringe Protection Group**Summary:**

Objective 6 (continued)

7. No funding allocated in IBC's financial plan to encourage modal shift.
8. Doesn't include proportionate evidence. New Evidence database incomplete as excludes Transport documents, especially modal shift related and S106 schedules for approved IGS developments which haven't been made publicly available.
9. Concerned that road bridges (and country park) may not be delivered in time (February 2022) to receive £9.8m HIF. If so, then CS is unsound unless alternative funding available.
10. Not positively prepared as fails to fully assess transport infrastructure requirements, especially in relation to timing of delivery (including sewage).

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26497

Object

Chapter 6 - Vision and Objectives**Respondent:** Northern Fringe Protection Group**Summary:**

Objective 5:

- Inconsistent with national policy, fails to comply with legal limits. Must be requirement.
- Strengthen commitment to Improve Air Quality, no real improvement over past decade.
- No funding in financial plan for improving air quality.
- No AQA. Must be completed urgently. Include assessments for early years of developments, construction traffic, rail/sea and different levels of modal shift rather than unsubstantiated levels assumed.
- Pointless undertaking an AQA in 2036, banned non-electric vehicles. Early years worst. Suggest earlier assessment.
- Ambiguity over 2004 emission levels cited.
- Object to removal of 'improve Air Quality' objective/ indicator.

Change suggested by respondent:

Undertake an air quality assessment earlier in the plan period and not 2036. Reinstate 'Number of recorded air quality exceedances' as indicator.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26507

Object

Chapter 6 - Vision and Objectives**Respondent:** Northern Fringe Protection Group**Summary:**

Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective. The Vision needs to include an improvement in air quality levels and compliance with legally binding targets. Climate emergency also needs to be included.

Change suggested by respondent:

Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility. Include air quality improvement and climate emergency within vision.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26509

Object

Chapter 6 - Vision and Objectives**Respondent:** Northern Fringe Protection Group**Summary:**

Objective 6; why 15% modal shift by 2031 target removed given still required for soundness. Imperative that modal shift target for 2026 included. Must report the modal shift levels achieved through Travel Ipswich in AMR (appendix 5 quoted). Evidence needed showing that modal shift can be delivered. Need to illustrate what "additional east-west highway capacity" is. Considerable investment in public transport required. Insufficient firm proposals or funding to deliver the required modal shift levels throughout the CS period. CS is unsound as it lacks a transport solution that supports proposed growth. Agree some form of northern route required for soundness.

Change suggested by respondent:

Imperative that modal shift target for 2026 included. IBC must report the modal shift levels achieved through Travel Ipswich in AMR (appendix 5 quoted). Evidence needed showing that modal shift can be delivered.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26534

Object

Chapter 6 - Vision and Objectives**Respondent:** Northern Fringe Protection Group**Summary:**

The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the CS period and plan for its provision. This remains a major failing of the CS making it unsound. We note that improvements to sewage infrastructure has been included in ISPA2 and it also needs to be included in relation to the IGS. The potential impact of Sizewell C on the IGS and the CS has not been assessed in any form of sensitivity analysis.

Change suggested by respondent:

Improvements to sewage infrastructure should be included in relation to the IGS. Impact of Sizewell C on the IGS and the CS need to be assessed.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26517

Object

Chapter 7 - Key Diagram**Respondent:** Northern Fringe Protection Group**Summary:**

Strongly disagree with the proposed change to replace "green rim" with "green trail". The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it. Change in name is misleading and is actually to bring forward land at Humber Doucy Lane for development. Non-compliant with DM8. See appendix 1 for history of the green rim/ corridors. No mention of the green rim/ trail being used in the Ipswich Cycling Strategy.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26528

Object

Policy CS17 Delivering Infrastructure**Respondent:** Northern Fringe Protection Group**Summary:**

Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM 8 as no means of funding the required.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26506

Object

Chapter 10 - Implementation**Respondent:** Northern Fringe Protection Group**Summary:**

No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. The 13 transport projects need to be included in the Infrastructure Tables. If any of projects aren't delivered by the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates. Bramford Road/ Sproughton Road link road must be included.

Change suggested by respondent:

Include firm proposals for new sewage infrastructure in tables. Include 13 transport projects and dates for completion to deliver transport mitigation programme. Include Bramford Road/ Sproughton Road link Road (IP029).

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26500

Object

Policy DM4 Development and Flood Risk**Respondent:** Northern Fringe Protection Group**Summary:**

The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents.(see image of better map to illustrate.)

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26521

Object

Policy ISPA1 Growth in the Ipswich Strategic Planning Area**Respondent:** Northern Fringe Protection Group**Summary:**

Argued for years that previous homes and employment targets set by IBC were too high, unrealistic and based upon flawed evidence. Now clear that previous Plans were unsound and were therefore sub-optimal for Ipswich as we argued strongly at the time. Disappointing that IBC has taken so long to accept this. The proposed lower targets are more realistic. Agree with IBC that it has established a 5-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply. Potential impact of Sizewell C on IGS and CS has not been assessed (rail freight Ipswich-Westerfield).

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26510

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Northern Fringe Protection Group**Summary:**

Regarding northern route (paragraph 8.19), IBC states support for such a route. We would like to draw attention to the article in the Ipswich Star (27/02/2019) and East Anglian Daily Times (22/02/2020) where the leader of IBC supports a northern bypass. Both previous Labour and Conservative Ipswich MPs have also argued for a northern route as a priority. This paragraph and the CS need to be updated to take account of the decision that the northern route will NOT be progressed further.

Change suggested by respondent:

Paragraph 8.19 and CS need to be updated to take account of decision not to progress northern route.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26522

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Northern Fringe Protection Group**Summary:**

This needs to include the following highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound. See 12 highways schemes listed in attached letter. This list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson. Needs to be confirmed whether this infrastructure project has been included and modelled accordingly. Support the inclusion of sewage infrastructure in ISPA2.

Change suggested by respondent:

The modelling work needs to include the highway schemes identified.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26499

Object

Policy DM13 Built Heritage and Conservation**Respondent:** Northern Fringe Protection Group**Summary:**

We strongly object to the re-designation of the Ipswich "green rim" to "green trails". This is in breach of DM13 and unsound.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26537

Support

Policy DM20 Houses in Multiple Occupation**Respondent:** Northern Fringe Protection Group**Summary:**

We support the new Policy 20 as a pragmatic and sensible response to an increasing issue in Ipswich.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26512

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Northern Fringe Protection Group**Summary:**

Challenge need for future development at the northern end of Humber Doucy Lane. This is no longer required by Suffolk Coastal to meet its housing target. Settlement Sensitivity Assessment recognises the sensitivity of the open land between the edge of suburban Ipswich and villages of Westerfield and Rushmere. Concludes that the area is "sensitive to development" and "care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town". Site too important/ sensitive to be built on, especially as it will need additional primary school, which has traffic implications.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26516

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Northern Fringe Protection Group**Summary:**

Traffic will increase traffic at junctions that are already over-capacity without any additional infrastructure. Breach of CS16 regarding protection/ enhancement of green corridors and the Green Rim (regardless of it being designated as countryside). Breach of policies DM8, DM10 and DM11 as no net biodiversity gains or green infrastructure through development. Acts as a rural buffer. Regardless, should be no development of this land until completion of IGS. Needs to be clarified in the CS. SA needs to fully assess implications on building on site and whether delivering more homes in town centre instead of retail is more sustainable option.

Change suggested by respondent:

Should be no development of this land until completion of IGS. SA needs to fully assess implications on building on site and whether delivering more homes in town centre instead of retail is more sustainable option.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26525

Object

Policy CS1 Sustainable Development**Respondent:** Northern Fringe Protection Group**Summary:**

Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

Change suggested by respondent:

Reference air quality targets and climate emergency.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26514

Object

Policy CS2 The Location and Nature of Development**Respondent:** Northern Fringe Protection Group**Summary:**

Level of town centre retail development isn't required , land better used for new homes. Town centre housing has lower impact on traffic congestion and air quality than outskirts development. Opportunities to convert existing excess town centre retail into housing. This approach should be used instead of Humber Doucy Lane, which will exacerbate traffic congestion into town centre and along Valley/Rd/Colchester Rd. Ipswich Central supports increase in town centre homes. Will improve town centre and night-time economy, reduce traffic into the centre, facilitate modal shift and improve air quality. Parking Strategy over-estimates parking demand, brownfield parking land better for housing.

Change suggested by respondent:

Focus housing in the town centre by allocating less retail development. Delete allocation at Humber Doucy Lane.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26518

Object

Policy CS4 Protecting our Assets**Respondent:** Northern Fringe Protection Group**Summary:**

Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it. Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM 8 as no means of funding the required.

Change suggested by respondent:

Add the Green Rim as an asset to Policy CS4.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26494

Object

Policy CS5 Improving Accessibility**Respondent:** Northern Fringe Protection Group**Summary:**

IBC is failing to Improve Access in breach of CS5. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport. concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered. disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base. new infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26531

Object

Policy CS5 Improving Accessibility**Respondent:** Northern Fringe Protection Group**Summary:**

Only two major changes to cycle network since adopted CS. Lack of commitment to maintain existing network and cycle infrastructure poor. Need to evidence initiatives implemented and modal shift achieved. No progress in meeting requirements of CS5. SCC draft local cycling & walking infrastructure plan referenced. Clear that without major improvements there is no chance of modal shift being achieved. Cycling/ walking is unattractive, unsafe, incoherent and uncomfortable. Bus routes just go into town rather than radial. Investment in bus network required. No money allocated over four-year period to improving air quality, delivering modal shift or improving cycle/ pedestrian infrastructure.

Change suggested by respondent:

Include a requirement on IBC to assess and test the viability of such bus routes to Improve Accessibility and help contribute to modal shift.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26523

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Northern Fringe Protection Group**Summary:**

Sewage infrastructure should be included. No agreed sewage infrastructure. If sewage infrastructure cannot be provided at the right time and right price for the IGS (as a whole) then IGS cannot be delivered in accordance with the Plan. All off-line sewage storage should be provided on-site. Not clear what RAMS S106 payments agreed with CBRE and Crest as S106 not public. If no RAMS tariffs included this could be in breach of SPD and policies CS4, CS17 and DM31 of adopted CS. New CS unsound in relation to CS4 CS17 and DM8 as no means of funding the required.

Change suggested by respondent:

Include sewage infrastructure in list of infrastructure requirements for IGS.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26532

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Northern Fringe Protection Group**Summary:**

Concerns on road network to cope with additional traffic without northern relief road. Concerned bridges not built in time (March 2022) to secure HIF and permissions only require vehicle bridge on delivery of 699 homes, impossible before March 2022 (HIF). Bridge too narrow for all road users and needed for safety. Without early delivery of road/ pedestrian bridge, no safe walking/cycling. Need contingency measures for alternative funding and evidence that infrastructure deliverable. Delivery of roads must be compatible with traffic modelling. Unless alternative funding provided, levels of modal shift will not be achieved by 2026.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26533

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Northern Fringe Protection Group**Summary:**

Concerns about funding of off-site infrastructure due to late trigger point in permissions, undermining modal shift 2026 delivery. Modelling is hiding fact that Ipswich roads near IGS are already heavily congested with roads already operating at capacity at peak times. Modelling must identify when key junctions and links reach capacity and how congestion will be mitigated. Concerned that modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads, worsening air quality and no assessment of this factored in. Sizewell-C and Felixstowe 30% increase in trains not assessed (rail-freight). No AQA for IGS permissions. Unsound.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26513

Object

Policy CS14 Retail Development and Main Town Centre Uses**Respondent:** Northern Fringe Protection Group**Summary:**

We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets).

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26520

Object

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Northern Fringe Protection Group**Summary:**

The Council in its paper is mis-leading Councillors as the concept of corridors and the green rim was for the corridors to provide access on foot or by cycle to the countryside surrounding Ipswich. That countryside then became known as the green rim and the intention was for the green rim to be protected from development. We note that in subsequent CSs the green rim has been considerably reduced in size, which demonstrates the Council's lack of commitment to protecting open space and improving biodiversity in its own Plans. The change in definition is effectively non-compliant with policy DM8.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26536

Object

Policy CS17 Delivering Infrastructure**Respondent:** Northern Fringe Protection Group**Summary:**

No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. The 13 transport projects need to be included in the Infrastructure Tables. If any of projects aren't delivered by the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates. Bramford Road/ Sproughton Road link road must be included.

Change suggested by respondent:

Include firm proposals for new sewage infrastructure in tables. Include 13 transport projects and dates for completion to deliver transport mitigation programme. Include Bramford Road/ Sproughton Road link Road (IP029).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26495

Object

Policy CS20 Key Transport Proposals**Respondent:** Northern Fringe Protection Group**Summary:**

IBC is failing to Improve Access in breach of CS20. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport. Concerned our comments on CS20 in relation to the transport modelling and modal shift haven't been adequately considered. Transport Mitigation Strategy and other relevant modal shift documents not included in Evidence Base. New infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary. See detailed comments on Transport Modelling and Mitigation Strategy (pages 26 - 32). Amend 8.241.

Change suggested by respondent:

Amend paragraph 8.241 to "Air Quality Management Areas are designated in areas where poor air quality will have an effect on people's health".

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26511

Object

Policy CS20 Key Transport Proposals**Respondent:** Northern Fringe Protection Group**Summary:**

IBC must explain why elected leader believes Ipswich cannot cope with existing volumes of traffic and that it's sound to increase traffic. Needs to recognise that SCC is concerned about traffic volume management and announced that it's establishing a taskforce to look at new ways of tackling the town's traffic. See David Ellesmere quote re; Europa Way/ Bramford Road link. TUOC and Northern Route not proceeding. Substantial evidence of modal shift delivery and funding needed to demonstrate this achievable. ISPA modelling needs to include additional highway schemes (see list). Ambiguity over delivery dates and funding. Detailed comments on mitigation strategy.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26526

Object

Policy DM1 Sustainable Construction**Respondent:** Northern Fringe Protection Group**Summary:**

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

Change suggested by respondent:

Climate emergency declaration needs to be referenced.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26527

Object

Policy DM2 Decentralised Renewable or Low Carbon Energy**Respondent:** Northern Fringe Protection Group**Summary:**

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account

Change suggested by respondent:

Needs to reference climate emergency declaration.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26530

Object

Policy DM3 Air Quality**Respondent:** Northern Fringe Protection Group**Summary:**

Transport Modelling includes challenging modal shift assumptions. Unless evidence of funding and plans to improve the ineffective cycling network provided, the levels of modal shift unreachable. Contrary to NPPF 181. CS needs to make clear commitment to improving air quality and compliance with legally binding air pollution targets. Fails to follow Government's guidelines and waters down Government requirements. Flaws in WSP Source Apportionment Study. New modelling needs to address issues and focus on air quality in first 10 years. No AQA provided as part of this consultation, unacceptable. Reserve right to comment on this. No AQA for IGS.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26529

Object

Policy DM8 The Natural Environment**Respondent:** Northern Fringe Protection Group**Summary:**

Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it. Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM8 as no means of funding the required.

Change suggested by respondent:

Add green rim as an asset to CS4.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26519

Object

Policy DM10 Green Corridors**Respondent:** Northern Fringe Protection Group**Summary:**

The Council in its paper is mis-leading Councillors as the concept of corridors and the green rim was for the corridors to provide access on foot or by cycle to the countryside surrounding Ipswich. That countryside then became known as the green rim and the intention was for the green rim to be protected from development. We note that in subsequent CSs the green rim has been considerably reduced in size, which demonstrates the Council's lack of commitment to protecting open space and improving biodiversity in its own Plans. The change in definition is effectively non-compliant with policy DM8.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26538

Object

Policy DM21 Transport and Access in New Developments**Respondent:** Northern Fringe Protection Group**Summary:**

Object to removal criterion a. Specifically; "rights of way or the local road network in respect of traffic capacity" must be reinstated as walking/ cycling shouldn't be reduced as traffic congestion is a major problem and local new developments shouldn't negatively impact. Changes conflict with CS5. Support change regarding highway safety (criterion B). However IGS is non-compliant as failed to assess impacts of development on air quality. Revised assessment of air quality impacts of IGS urgently required before commencement. Unclear how 'severe' and 'significant' impacts defined. Maximum legal limits for particulates and nitrous oxides, and this should be 'significant'.

Change suggested by respondent:

Reinstate criterion a.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26195

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Derk Noske**Summary:**

This site (ISPA4.1) should remain as farmland to provide the Green Trail route outlined in the planning policy DM10 of the Ipswich Local Plan. Any additional housing would encroach on this pristine countryside that today provides easy access to green spaces as set out in the local plan

Change suggested by respondent:

No housing to be developed on these sites.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

26381

Object

Chapter 4 - The Duty to Co-Operate**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

Ipswich's OAN have risen. Over the last two years house sales have fallen. There is functional need for IBC, ESDC and B&MSDC to ensure development needs are met. There seems to be little recognition of the potential of this area, or detail provided on how ESDC and IBC have cooperated. Ipswich's administrative boundary justifies significant efforts to work with neighbouring authorities as a priority on cross boundary issues. This absence of detail weighs against how positively prepared the Final Draft Local has been and the effectiveness of its approach over the plan period. Persimmon endorse the statements made by the HBF.

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26369

Object

Policy CS1 Sustainable Development**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

NPPF confirms the presumption in favour of sustainable development does not trump the statutory presumption in favour of the development plan set out in s38(6) of the Planning and Compulsory Purchase Act 2004. The wording is detailed at paragraph 2.2 of the final draft of the Core strategy. As such the inclusion of the model wording in Local Plans is no longer required. It is reasonable to consider that policy CS1 is not consistent with the National Policy and should be removed, in addition no robust justification for its continued inclusion has been provided. Persimmon also endorse the statements made by the HBF.

Change suggested by respondent:

CS1 should be removed.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26425

Object

Policy CS2 The Location and Nature of Development**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

A prescriptive approach in the interpretation of the policy would limit opportunities to respond to market forces, and possibly result in more situations such as Griffin Wharf (site reference IP200) where the viability of development is being questioned. Persimmon also endorse the statements made by the HBF

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26426

Object

Policy CS7 The Amount of Housing Required**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

A prescriptive approach in the interpretation of the policy would limit opportunities to respond to market forces, and possibly result in more situations such as Griffin Wharf (site reference IP200) where the viability of development is being questioned. Persimmon also endorse the statements made by the HBF.

Change suggested by respondent:

Not specified

Legally No**compliant:****Sound: Yes****Comply with No****duty:****Attachments:**

26386

Object

Policy CS8 Housing Type and Tenure**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

Within policy CS8 it is stated that through regard to the Ipswich Strategic Housing Market Assessment overall provision of a diverse range of housing will be secured, noting that the policy also states where that document remains up to date. Recent experiences of developing within the water front area in Ipswich has confirmed that there is a weak market for high density flatted development in Ipswich. It is recommended that allocations for schemes are revisited with a view to allow for lower density development. Persimmon endorse the statements made by the HBF.

Change suggested by respondent:

It is recommended that allocations for schemes are revisited with a view to allow for lower density development.

Legally No**compliant:****Sound: No****Comply with No****duty:****Attachments:**

26424

Object

Policy CS8 Housing Type and Tenure**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

It is also reasonable to question what time period is being used to define if the SHMA is up to date, in addition to recognition that market forces move quicker than the updating of evidence bases that support Local Plans. Defining what those time periods are would allow for clarity in future discussions on what weight can be afforded to alternative sources of evidence against the SHMA, but also provide developers with an element of certainty in discussions that appropriate sources of evidence have been referred to. Persimmon also endorse the statements made by the HBF.

Change suggested by respondent:

Not specified

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

26428

Object

Policy DM7 Provision of Private Outdoor Amenity Space and New and Existing Developments**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

Policy DM7 proposes minimum standard areas for private outdoor amenity space, but no evidence could be found that supports the figures detailed, including within local design guides. In addition the application of such standards varies between neighbouring authorities, which would reasonably call into question whether this policy has been adequately justified and is consistent with National Policy, whilst also being effective over the plan period. Where the policy details that lower figures may be acceptable where there is unavoidable conflict with the need to meet density requirements, additional flaws in its effectiveness arise due the questionability of how site densities are calculated given the current limited weight given to market forces and demands for different types of dwellings. Persimmon also endorse the statements made by the HBF.

Change suggested by respondent:

Not specified

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

26430

Object

Policy DM12 Design and Character**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

No justification has been provided on why there is a need for 25% of all housing on major developments to be designed to Part M4(2) standards in policy DM12. Without justification it could be argued that this figure is too high, as there may be possible overlap between the provision of specialist housing and the provision market housing, on the final delivery of M4(2) housing. This policy would not therefore be effective over the plan period. Persimmon also endorse the statements made by the HBF.

Change suggested by respondent:

Not specified

Legally compliant: No**Sound:** No**Comply with duty:** No**Attachments:**

26429

Object

Policy DM18 Amenity**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

It is recognised that the extent of overlooking would be assessed on a case-by-case basis, which is an approach that is welcomed. However, whilst flexibility built into the adopted policy is welcomed, within the supporting text titles of recognised published technical guidance on this matter to provide continuity in the assessment of this issue would be welcomed.

Change suggested by respondent:

Within the supporting text titles of recognised published technical guidance on this matter to provide continuity in the assessment of this issue would be welcomed. Persimmon also endorse the statements made by the HBF.

Legally compliant: No**Sound:** No**Comply with duty:** No**Attachments:**

26427

Object

Policy DM23 The Density of Residential Development**Respondent:** Persimmon Homes**Agent:** Persimmon Homes**Summary:**

A prescriptive approach in the interpretation of the policy would limit opportunities to respond to market forces, and possibly result in more situations such as Griffin Wharf (site reference IP200) where the viability of development is being questioned. Persimmon also endorses the statements made by the HBF.

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26447

Object

Chapter 4 - The Duty to Co-Operate**Respondent:** Pigeon Investment Management Ltd**Summary:**

Therefore Pigeon retain the view that, whilst there appears to be much mention of Ipswich Borough Council working with neighbouring authorities, this does not appear to materialise into any real contribution to delivering housing outside of the Ipswich Borough Council area during the plan period. Despite the comments made by Pigeon previously as part of the Regulation 18 Consultation, the Council do not appear to have given these any significant weight.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26443

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Pigeon Investment Management Ltd**Summary:**

Policy ISPA4 – Cross Boundary Working to Deliver Sites

3.1 Pigeon support the Council's inclusion of a policy that relates to the delivery of sites outside of the Borough. However, this policy remains almost the same as its version in the previous document, only including a little more detail.

Furthermore, this policy relates solely to site ISPA4.1. It does not therefore provide any general policy support or guidance for delivering Ipswich Borough Council's housing need for 8,010 homes (Policy CS7), outside of the authority area, particularly given the stepped housing trajectory with less homes delivered at the start of the plan period.

3.2 The Site Sheet for ISPA4.1 sets out that the development would need to be 'delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure that there is sufficient infrastructure capacity to meet demand'. The Ipswich Garden is assessed with further commentary within this representation, and in line with the conclusions of this, it is considered that reliance on the Ipswich Garden Suburb puts site ISPA4.1 at risk of delay.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26444

Object

Policy CS2 The Location and Nature of Development**Respondent:** Pigeon Investment Management Ltd**Summary:**

Policy CS2 – The Location and Nature of Development. The subtext to the policy sets out that the central urban focus to the location of development also reflects the sequential approach to site selection required by the NPPF (which encourages the use of previously developed land). However, Pigeon still seriously dispute the Council's ability to deliver housing on many of the brownfield sites, which are discussed in further detail in the following section of this report.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26445

Object

Policy CS7 The Amount of Housing Required**Respondent:** Pigeon Investment Management Ltd**Summary:**

Policy CS7 sets out a policy with the minimum housing number that Ipswich Borough Council proposes to deliver in its area. The Housing Land Supply only amounts to a total of 7,214 dwellings, including an allowance for windfall development. Therefore, the Council already acknowledge that they have an unmet housing need of 1,597 dwellings over the Plan period, taking into account the 10% contingency that is allowed for in the final paragraph of the policy. Steps should therefore be taken with the ISPAB to now identify locations outside the boundary of Ipswich Borough Council where this unmet need can be accommodated.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26446

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Pigeon Investment Management Ltd**Summary:**

There is an adopted SPD for this site, and within this it states that 'the success of the development of the Garden Suburb will depend to a large extent on the continued partnership working of the landowners, IBC and other key stakeholders to secure delivery'. This site is therefore reliant on multiple landowners coming forward and Pigeon would therefore argue that this complication will significantly delay the delivery of the development during the plan period. This concern should be afforded significant weight by the Council given that the Garden Suburb accounts for around half of the supply of housing.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26637

Object

Chapter 4 - The Duty to Co-Operate**Respondent:** Ravenswood Environmental Group**Summary:**

There is no cooperation between local authorities such as has happened around Cambridge or Norwich.

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26357

Support

Policy CS8 Housing Type and Tenure**Respondent:** Rentplus UK Ltd**Agent:** Rentplus UK Ltd**Summary:**

Pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26360

Object

Policy CS8 Housing Type and Tenure**Respondent:** Rentplus UK Ltd**Agent:** Rentplus UK Ltd**Summary:**

Welcome amendments to policy CS8 which promote a more flexible approach to mix where evidenced by the SHMA and other evidence of local needs. These amendments will assist in delivering the widest mix of housing and therefore meeting the widest range of needs. However, for clarity and consistency with the new fourth paragraph of CS8, the policy should be reworded slightly as follows: "In considering the most appropriate mix of homes by size, type and tenure for major residential proposals...."

Change suggested by respondent:

Change wording to Policy CS8 as above

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26358

Support

Policy CS12 Affordable Housing**Respondent:** Rentplus UK Ltd**Agent:** Rentplus UK Ltd**Summary:**

Pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

26368

Object

Policy CS12 Affordable Housing**Respondent:** Rentplus UK Ltd**Agent:** Rentplus UK Ltd**Summary:**

The SHMA 2019 does not refer to full range of tenures set out in Annex 2. Continue to recommend that a focused update to the SHMA is prepared in order to inform policy and planning decisions. Updates should assess needs for products such as affordable rent-to-buy. To ensure that the plan is effective, supporting text to CS12 should contain new paragraph after paragraph 8.153, committing to keeping the SHMA up to date; this would also help in the application of CS8.

Change suggested by respondent:

Add new paragraph after paragraph 8.153. Potential wording as follows: "In order to inform negotiation and decision taking and best meet the affordable housing needs of the Borough, the Council shall keep the Strategic Housing Market Assessment regularly updated. Any updates to the SHMA will contain up to date assessments of need for the full range of affordable housing tenures as defined in the National Planning Policy Framework. The Council will also consider other evidence of local needs where supported by the Council.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26292

Support

Chapter 9 - Development Management Policies**Respondent:** RSPB**Agent:** RSPB**Summary:**

During the prior consultation on the Ipswich Local Plan Review Preferred Options, the RSPB responded with comments on various policies and is very pleased to see that the majority of these have been taken into consideration. It also commends the explicit reference to take action to conserve and enhance swift populations in the Natural Environment Policy (DM8), Design and Character Policy (DM12) and Supplementary Planning Documents.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

26294

Object

Policy DM15 Tall Buildings**Respondent:** RSPB**Agent:** RSPB**Summary:**

Notable omission to DM15. Representation made at Issues and Options stage suggested inclusion of line in policy, 'k) to incorporate integrated swift-bricks.' Suggestion not included - seen as missed opportunity. Due to national plight of swifts, failing to include could constitute a failure in the Council's 'Duty to conserve biodiversity' under Section 40 of the Natural Environment and Rural Communities Act. Cost of incorporating bricks insignificant and attitude towards them is positive so would not affect Council's ability to exercise functions and would be consistent with County Council's Suffolk Nature Strategy. Inclusion not unprecedented - included in Hackney Local Plan.

Change suggested by respondent:

The RSPB hope that Ipswich Borough Council will consider including this provision in its Local Plan to ensure the precedent is set for conserving biodiversity in its development management policies and demonstrate its continued commitment to swift conservation.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26233

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Rushmere St Andrew Parish Council**Summary:**

Rushmere St Andrew Parish Council objects to the inclusion of Policy ISPA 4.1. This allocation will significantly increase traffic on the Woodbridge to Claydon corridor via Playford Road, Rushmere Street and Humber Doucy Lane. This development should not take place until significant improvements to roads and travel has been made. The Cross Working Policy refers to upgrading of road junctions but this does not address the concerns of the parish. More should be done to improve local roads and travel and it should be specified that improvements should be implemented prior to development.

Change suggested by respondent:

Delete Policy ISPA 4.1 and this policy.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

26343

Object

Chapter 4 - The Duty to Co-Operate**Respondent:** Save Our Country Spaces**Summary:**

Comments prepared in liaison with NFPG. SOCS have consistently baulked at the unrealistic/ unjustified housing and job targets. We have challenged population projections which have driven this agenda. Good, at last, that the legacy of growth, expansion, over ambition and wishful thinking of the early 2000's finally are being challenged. However, there is a way to go to achieve a sound plan. The Duty to Cooperate is hard for Ipswich to achieve when partner organisations are reluctant to take ownership/ responsibility for the adverse impacts they are imposing on the County Town. Ipswich has little power/ control for resolution.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26347

Object

Chapter 4 - The Duty to Co-Operate**Respondent:** Save Our Country Spaces**Summary:**

Purpose of review is to update the Core Strategy until 2036 taking into account new legislation and NPPF Updates and to align the Local Plan with neighbours. However, EastSuffolk is tasked with making modifications to their plan. SOCS very critical of the 'Statement of Common Ground' issued last year and submitted a response to the emerging Mid Suffolk Local Plan Consultation in addition to Suffolk Coastal District Council. SOCS attended and gave oral evidence to the EastSuffolk Plan Inquiry. Feel the Duty to Cooperate has not been effectively achieved within this Draft; nor has it by the partner local authorities.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26370

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Objectives 4 and 9; At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency. The CS needs to be updated to incorporate this to be sound.

Change suggested by respondent:

The Climate Emergency needs to be incorporated into the CS to the sound.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26382

Object

Chapter 5 - Ipswich - The Place**Respondent:** Save Our Country Spaces**Summary:**

5.25; Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge. IBC should be "delivering high levels of modal shift" rather than just "guiding as many trips as possible to sustainable modes" .Meeting the Climate Emergency needs to be added as a key challenge.

5.26 - table 2 - There are inconsistent references throughout the document (6.16, IBC FRA webpage, 8.45, 8.46, 8.225, DM4 PRFA). The situation regarding flood risk assessment within the CS is confusing and makes flood risk impossible to understand for the general public. Requires further clarification.

Change suggested by respondent:

The situation regarding flood risk assessment within the CS is confusing and makes flood risk impossible to understand for the general public. Requires further clarification.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26340

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Issues raised need to be fully assessed/ addressed for LP to be 'sound'. LP is unsound and doesn't comply with NPPF. "Climate Change" agenda insufficiently addressed. Proposals contrary to; NPPF 10. Environmental, social and economic effects of the plan(s) are inadequately/ inaccurately assessed against HRA and SA. "Serious adverse effects" not properly identified, as required under NPPF. This means any planning application almost impossible to determine, rendering the major IGS applications problematic and renders stakeholder responses to applications a problem. NPPF-11 not considered. Employment/ homes growth, including IGS, undermined by ongoing failure to properly assess cumulative requirement for wastewater infrastructure.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26342

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, including Quality of Life and Public Health. Potential to secure a "sustainable future" for existing local population, future populations/ generations is not demonstrated. Specific issues to be addressed:

1. Drainage
2. Flooding (Westerfield)
3. Sewage capacity
4. Traffic impact
5. Air pollution and health impact
6. Pressures on local facilities
7. Road widening/ removal of vegetation/ verges
8. Loss of high grade agricultural land
9. Loss of trees/ habitats
10. Country park delivery stalling
11. No need for dwellings given lack of new local jobs.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26348

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Lack of realistic accounting for the adopted policy on Climate Emergency and the Climate Change agenda, for 10 of the 12 objectives. Specifically in relation to traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality; climate emergency and climate change precipitated flood risk, loss of grade 2 farm land, loss of vital green rim and urban/rural separation with its attendant adverse impacts on the network of wildlife links with green corridors, especially to the County Wildlife site area of the Fynn Valley.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26359

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Objective 1; inadequately demonstrated. Objective 2; the 4% and 5% affordable housing negotiated on IGS doesn't match with the 31% quoted. Evidence of recent job losses in town undermines credibility of job target. Objective 3; Lack of justification for HDL. Objective 5; Concerns about railway noise/ vibration from intensification of line and traffic from humpback bridge. Current rail noise causes residents complaints and audible for a distance of about 1/4-1/2 a mile at night causing significant sleep-disturbance especially in summer. 5 point rail plan agreed 2018 and no assessment of diesel pollution. Adopted indicator of air quality exceedances should be reinstated.

Change suggested by respondent:

Adopted indicator of air quality exceedances should be reinstated for objective 5.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26362

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Objective 6:

1. Junctions/ link roads at/near capacity, not addressed. No evidence growth is sound.
2. Severe capacity issues in 2026 but no infrastructure projects in Infrastructure Tables. Especially town centre, Ipswich Garden Suburb and A1214.
3. Modelling fails to identify when junctions will reach capacity.
4. Failing to Improve Access in breach of CS5. Modal Shift assumptions too high, uncompliant with CS20.
5. CCC assumes 10% modal shift by 2050. No evidence 15% modal shift deliverable by 2026? CCC assumption should be used.
6. Existing walking/ cycling infrastructure substandard, won't enable delivery of modal shift. Need new cycling indicator.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26363

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Objective 6 (continued)

7. No funding allocated in IBC's financial plan to encourage modal shift.
8. Doesn't include proportionate evidence. New Evidence database incomplete as excludes Transport documents, especially modal shift related and S106 schedules for approved IGS developments which haven't been made publicly available.
9. Concerned that road bridges (and country park) may not be delivered in time (February 2022) to receive £9.8m HIF. If so, then CS is unsound unless alternative funding available.
10. Not positively prepared as fails to fully assess transport infrastructure requirements, especially in relation to timing of delivery (including sewage).

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26367

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Objective 5:

1. Inconsistent with national policy, fails to comply with legal limits. Must be requirement.
2. Strengthen commitment to Improve Air Quality, no real improvement over past decade.
3. No funding in IBC's financial plan for improving air quality.
- 4.No AQA. Must be completed urgently. Include assessments for early years of developments, construction-related traffic and rail/sea traffic and impacts of different levels of modal shift rather than unsubstantiated levels assumed.
5. Little point undertaking an AQA in 2036 as ban on non-electric vehicles. Early years likely to be worst. Suggest earlier assessment.
6. Ambiguity over 2004 emission levels cited.

Change suggested by respondent:

Undertake an air quality assessment earlier in the plan period and not 2036.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26380

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective. The Vision needs to include an improvement in air quality levels and compliance with legally binding targets. Climate emergency also needs to be included.

Change suggested by respondent:

Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility. Include air quality improvement and climate emergency within vision.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26383

Object

Chapter 6 - Vision and Objectives**Respondent:** Save Our Country Spaces**Summary:**

Objective 6; why 15% modal shift by 2031 target removed given still required for soundness. Imperative that modal shift target for 2026 included. Must report the modal shift levels achieved through Travel Ipswich in AMR (appendix 5 quoted). Evidence needed showing that modal shift can be delivered. Need to illustrate what "additional east-west highway capacity" is. Considerable investment in public transport required. Insufficient firm proposals or funding to deliver the required modal shift levels throughout the CS period. CS is unsound as it lacks a transport solution that supports proposed growth. Switch to electric cars will not solve health impacts.

Change suggested by respondent:

Imperative that modal shift target for 2026 included. IBC must report the modal shift levels achieved through Travel Ipswich in AMR (appendix 5 quoted). Evidence needed showing that modal shift can be delivered.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26398

Object

Chapter 7 - Key Diagram**Respondent:** Save Our Country Spaces**Summary:**

Strongly disagree with the proposed change to replace "green rim" with "green trail". The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it. Change in name is misleading and is actually to bring forward land at Humber Doucy Lane for development. Non-compliant with DM8. See appendix 1 for history of the green rim/ corridors. No mention of the green rim/ trail being used in the Ipswich Cycling Strategy.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26410

Object

Policy CS17 Delivering Infrastructure**Respondent:** Save Our Country Spaces**Summary:**

Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM 8 as no means of funding the required.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26379

Object

Chapter 10 - Implementation**Respondent:** Save Our Country Spaces**Summary:**

No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. The 13 transport projects need to be included in the Infrastructure Tables. If any of projects aren't delivered by the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates. Bramford Road/ Sproughton Road link road must be included.

Change suggested by respondent:

Include firm proposals for new sewage infrastructure in tables. Include 13 transport projects and dates for completion to deliver transport mitigation programme. Include Bramford Road/ Sproughton Road link Road (IP029).

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26372

Object

Policy DM4 Development and Flood Risk**Respondent:** Save Our Country Spaces**Summary:**

The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents.(see image of better map to illustrate.)

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26402

Object

Policy ISPA1 Growth in the Ipswich Strategic Planning Area**Respondent:** Save Our Country Spaces**Summary:**

Argued for years that previous homes and employment targets set by IBC were too high, unrealistic and based upon flawed evidence. Now clear that previous Plans were unsound and were therefore sub-optimal for Ipswich as we argued strongly at the time. Disappointing that IBC has taken so long to accept this. The proposed lower targets are more realistic. Agree with IBC that it has established a 5-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply. Potential impact of Sizewell C on IGS and CS has not been assessed (rail freight Ipswich-Westerfield).

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26384

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Save Our Country Spaces**Summary:**

Regarding northern route (paragraph 8.19), IBC states support for such a route. We would like to draw attention to the article in the Ipswich Star (27/02/2019) and East Anglian Daily Times (22/02/2020) where the leader of IBC supports a northern bypass. Both previous Labour and Conservative Ipswich MPs have also argued for a northern route as a priority. This paragraph and the CS need to be updated to take account of the decision that the northern route will NOT be progressed further.

Change suggested by respondent:

Paragraph 8.19 and CS need to be updated to take account of decision not to progress northern route.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26403**Object****Policy ISPA2 Strategic Infrastructure Priorities****Respondent:** Save Our Country Spaces**Summary:**

This needs to include the following highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound. See 12 highways schemes listed in attached letter. This list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson. Needs to be confirmed whether this infrastructure project has been included and modelled accordingly. Support the inclusion of sewage infrastructure in ISPA2.

Change suggested by respondent:

The modelling work needs to include the highway schemes identified.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26371**Object****Policy DM13 Built Heritage and Conservation****Respondent:** Save Our Country Spaces**Summary:**

We strongly object to the re-designation of the Ipswich "green rim" to "green trails". This is in breach of DM13 and unsound.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26480

Support

Policy DM20 Houses in Multiple Occupation**Respondent:** Save Our Country Spaces**Summary:**

We support the new Policy 20 as a pragmatic and sensible response to an increasing issue in Ipswich.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26353

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Save Our Country Spaces**Summary:**

SOCS; "Adverse impacts and significant disruption will undoubtedly occur in both the short and long term on existing residents' Quality of Life and Well being"; point conceded by Portfolio holder (paper E/13/601); " 2.2 The development of the Northern Fringe involves major challenges due to its largescale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities." ISPA4 is unjustified/ unsound. Concerns regarding air quality, flood risk vulnerability and biodiversity/ habitat loss. Future households will have to bear costs of management/ maintenance of drainage. Should be levied to new houses.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26387

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Save Our Country Spaces**Summary:**

Challenge need for future development at the northern end of Humber Doucy Lane. This is no longer required by Suffolk Coastal to meet its housing target. Settlement Sensitivity Assessment recognises the sensitivity of the open land between the edge of suburban Ipswich and villages of Westerfield and Rushmere. Concludes that the area is "sensitive to development" and "care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town". Site too important/ sensitive to be built on, especially as it will need additional primary school, which has traffic implications.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26396

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Save Our Country Spaces**Summary:**

Traffic will increase traffic at junctions that are already over-capacity without any additional infrastructure. Breach of CS16 regarding protection/ enhancement of green corridors and the Green Rim (regardless of it being designated as countryside). Breach of policies DM8, DM10 and DM11 as no net biodiversity gains or green infrastructure through development. Acts as a rural buffer. Regardless, should be no development of this land until completion of IGS. Needs to be clarified in the CS. SA needs to fully assess implications on building on site and whether delivering more homes in town centre instead of retail is more sustainable option.

Change suggested by respondent:

Should be no development of this land until completion of IGS. SA needs to fully assess implications on building on site and whether delivering more homes in town centre instead of retail is more sustainable option.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26356

Object

Policy CS1 Sustainable Development**Respondent:** Save Our Country Spaces**Summary:**

Lacks clarity in respect of flooding risk. In March 2016, SCC Portfolio holder Matthew Hicks confessed the need to work better together (see full quote). Ipswich no longer have their own dedicated drainage engineering department which places them at a disadvantage. There should be a reference to the work of the Food and Farming Commission and to the issue of sustainable land use. See extract. Needs to reflect the legal requirement to comply with Air Quality targets. Climate emergency declaration and carbon neutral commitment need to be referenced to be consistent with Court of Appeal ruling on Heathrow.

Change suggested by respondent:

Reference the work of the Food and Farming Commission and the issue of sustainable land use. Reference air quality targets and climate emergency.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26389

Object

Policy CS2 The Location and Nature of Development**Respondent:** Save Our Country Spaces**Summary:**

Level of town centre retail development isn't required, land better used for new homes. Town centre housing has lower impact on traffic congestion and air quality than outskirt development. Opportunities to convert existing excess town centre retail into housing. This approach should be used instead of Humber Doucy Lane, which will exacerbate traffic congestion into town centre and along Valley/Rd/Colchester Rd. Ipswich Central supports increase in town centre homes. Will improve town centre and night-time economy, reduce traffic into the centre, facilitate modal shift and improve air quality. Parking Strategy over-estimates parking demand, brownfield parking land better for housing.

Change suggested by respondent:

Focus housing in the town centre by allocating less retail development. Delete allocation at Humber Doucy Lane.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26399

Object

Policy CS4 Protecting our Assets**Respondent:** Save Our Country Spaces**Summary:**

Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it. Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM 8 as no means of funding the required.

Change suggested by respondent:

Add the Green Rim as an asset to Policy CS4.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26364

Object

Policy CS5 Improving Accessibility**Respondent:** Save Our Country Spaces**Summary:**

IBC is failing to Improve Access in breach of CS5. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport. concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered. disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base. new infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26413

Object

Policy CS5 Improving Accessibility**Respondent:** Save Our Country Spaces**Summary:**

Only two major changes to cycle network since adopted CS. Lack of commitment to maintain existing network and cycle infrastructure poor. Need to evidence initiatives implemented and modal shift achieved. No progress in meeting requirements of CS5. SCC draft local cycling & walking infrastructure plan referenced. Clear that without major improvements there is no chance of modal shift being achieved. Cycling/ walking is unattractive, unsafe, incoherent and uncomfortable. Bus routes just go into town rather than radial. Investment in bus network required. No money allocated over four-year period to improving air quality, delivering modal shift or improving cycle/ pedestrian infrastructure.

Change suggested by respondent:

Include a requirement on IBC to assess and test the viability of such bus routes to Improve Accessibility and help contribute to modal shift.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26354

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Save Our Country Spaces**Summary:**

Quotes from SOCS and Portfolio Holder regarding impacts/ challenges (see attached). Concerns regarding air quality, flood risk vulnerability and biodiversity/ habitat loss. Future households will bear costs of management/ maintenance of drainage, levy new houses instead. Concerns on road network to cope with additional traffic without northern relief road. Concerned bridges not built in time to secure HIF and permissions only require vehicle bridge on delivery of 699 homes, impossible before March 2022 (HIF). Bridge too narrow for all road users and needed for safety. Need contingency measures for alternative funding. Delivery of roads must be compatible with traffic modelling.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26404

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Save Our Country Spaces**Summary:**

Sewage infrastructure should be included. No agreed sewage infrastructure. If sewage infrastructure cannot be provided at the right time and right price for the IGS (as a whole) then IGS cannot be delivered in accordance with the Plan. All off-line sewage storage should be provided on-site. Not clear what RAMS S106 payments agreed with CBRE and Crest as S106 not public. If no RAMS tariffs included this could be in breach of SPD and policies CS4, CS17 and DM31 of adopted CS. New CS unsound in relation to CS4 CS17 and DM8 as no means of funding the required.

Change suggested by respondent:

Include sewage infrastructure in list of infrastructure requirements for IGS.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26416

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Save Our Country Spaces**Summary:**

Concerns about funding of off-site infrastructure due to late trigger point in permissions, undermining modal shift 2026 delivery. Modelling is hiding fact that Ipswich roads near IGS are already heavily congested with roads already operating at capacity at peak times. Modelling must identify when key junctions and links reach capacity and how congestion will be mitigated. Concerned that modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads, worsening air quality and no assessment of this factored in. Sizewell-C and Felixstowe 30% increase in trains not assessed (rail-freight). No AQA for IGS permissions. Unsound.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26388

Object

Policy CS14 Retail Development and Main Town Centre Uses**Respondent:** Save Our Country Spaces**Summary:**

We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets).

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26352

Object

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Save Our Country Spaces**Summary:**

Tuddenham Road/Westerfield green corridors are home to significant number of recorded protected species (great crested newts, badgers, hedgehogs, bats and all manner of species) as well as birds, flora/ fauna; Southern Marsh and bee orchids found on the Fynn Valley and adjacent area. Due to private ownership, there is little interest for formal surveys due to landowners aspirations for land use. SWT done some work within Red House Ipswich, the Fynn Valley CWS; a Hedgerow Survey of the whole IGS area completed. Active badger sets reported. Object to change from green rim to green trail as this is misleading. Approach to green infrastructure unsound due to constraints of IGS and HDL.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: Yes

Comply with Not specified
duty:

Attachments:

26401

Object

Policy CS16 Green Infrastructure, Sport and Recreation**Respondent:** Save Our Country Spaces**Summary:**

Strongly disagree with the proposed change to replace "green rim" with "green trail". The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it. Change in name is misleading and is actually to bring forward land at Humber Doucy Lane for development. Non-compliant with DM8. See appendix 1 for history of the green rim/ corridors. No mention of the green rim/ trail being used in the Ipswich Cycling Strategy.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26535

Object

Policy CS17 Delivering Infrastructure**Respondent:** Save Our Country Spaces**Summary:**

No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. The 13 transport projects need to be included in the Infrastructure Tables. If any of projects aren't delivered by the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates. Bramford Road/ Sproughton Road link road must be included.

Change suggested by respondent:

Include firm proposals for new sewage infrastructure in tables. Include 13 transport projects and dates for completion to deliver transport mitigation programme. Include Bramford Road/ Sproughton Road link Road (IP029).

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26365

Object

Policy CS20 Key Transport Proposals**Respondent:** Save Our Country Spaces**Summary:**

IBC is failing to Improve Access in breach of CS20. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport. Concerned our comments on CS20 in relation to the transport modelling and modal shift haven't been adequately considered. Transport Mitigation Strategy and other relevant modal shift documents not included in Evidence Base. New infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary. See detailed comments on Transport Modelling and Mitigation Strategy (pages 26 - 32). Amend 8.241.

Change suggested by respondent:

Amend paragraph 8.241 to "Air Quality Management Areas are designated in areas where poor air quality will have an effect on people's health".

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26385

Object

Policy CS20 Key Transport Proposals**Respondent:** Save Our Country Spaces**Summary:**

IBC must explain why elected leader believes Ipswich cannot cope with existing volumes of traffic and that it's sound to increase traffic. Needs to recognise that SCC is concerned about traffic volume management and announced that it's establishing a taskforce to look at new ways of tackling the town's traffic. See David Ellesmere quote re; Europa Way/ Bramford Road link. TUOC and Northern Route not proceeding. Substantial evidence of modal shift delivery and funding needed to demonstrate this achievable. ISPA modelling needs to include additional highway schemes (see list). Ambiguity over delivery dates and funding. Detailed comments on mitigation strategy.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26407

Object

Policy DM1 Sustainable Construction**Respondent:** Save Our Country Spaces**Summary:**

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

Change suggested by respondent:

Climate emergency declaration needs to be referenced.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26408

Object

Policy DM2 Decentralised Renewable or Low Carbon Energy**Respondent:** Save Our Country Spaces**Summary:**

At the Executive meeting 9th July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

Change suggested by respondent:

Needs to reference climate emergency declaration.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26414

Object

Policy DM3 Air Quality**Respondent:** Save Our Country Spaces**Summary:**

Transport Modelling includes challenging modal shift assumptions. Unless evidence of funding and plans to improve the ineffective cycling network provided, the levels of modal shift unreachable. Contrary to NPPF 181. CS needs to make clear commitment to improving air quality and compliance with legally binding air pollution targets. Fails to follow Government's guidelines and waters down Government requirements. Flaws in WSP Source Apportionment Study. New modelling needs to address issues and focus on air quality in first 10 years. No AQA provided as part of this consultation, unacceptable. Reserve right to comment on this. No AQA for IGS.

Change suggested by respondent:

Not specified

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26409

Object

Policy DM8 The Natural Environment**Respondent:** Save Our Country Spaces**Summary:**

Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it. Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM 8 as no means of funding the required.

Change suggested by respondent:

Add green rim as an asset to CS4.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26351

Object

Policy DM10 Green Corridors**Respondent:** Save Our Country Spaces**Summary:**

Tuddenham Road/Westerfield green corridors are home to significant number of recorded protected species (great crested newts, badgers, hedgehogs, bats and all manner of species) as well as birds, flora/ fauna; Southern Marsh and bee orchids found on the Fynn Valley and adjacent area. Due to private ownership, there is little interest for formal surveys due to landowners aspirations for land use. SWT done some work within Red House Ipswich, the Fynn Valley CWS; a Hedgerow Survey of the whole IGS area completed. Active badger sets reported. Object to change from green rim to green trail as this is misleading.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26481

Object

Policy DM21 Transport and Access in New Developments**Respondent:** Save Our Country Spaces**Summary:**

Object to removal criterion a. Specifically; "rights of way or the local road network in respect of traffic capacity" must be reinstated as walking/ cycling shouldn't be reduced as traffic congestion is a major problem and local new developments shouldn't negatively impact. Changes conflict with CS5. Support change regarding highway safety (criterion B). However IGS is non-compliant as failed to assess impacts of development on air quality. Revised assessment of air quality impacts of IGS urgently required before commencement. Unclear how 'severe' and 'significant' impacts defined. Maximum legal limits for particulates and nitrous oxides, and this should be 'significant'.

Change suggested by respondent:

Reinstate criterion a.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26641

Support

Chapter 4 - The Duty to Co-Operate

Respondent: Silverton Aggregates Ltd

Summary:

It would appear that the Council has sought to co-operate with the neighbouring authorities and statutory bodies on the key strategic and cross boundary issues. This is welcomed, and we consider that this is important given the tightly drawn administrative boundary, which constrains the practical options for meeting needs for development within the Borough.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26643

Object

Chapter 5 - Ipswich - The Place

Respondent: Silverton Aggregates Ltd

Summary:

Welcomed that IBC are using regeneration opportunities to address deprivation, make places safer and create opportunities for all. Site should therefore be considered as an appropriate location for residential development, which would accord with National and Local Policy in this regard. Ipswich-specific issues being the limited availability of land, and large areas of protected land. Strongly recommended that the Council should be seeking to allocate additional residential sites to meet this unmet housing need within the Borough. Land north of Burrell Road is a suitable, available and deliverable site and should be allocated for residential development.

Change suggested by respondent:

Include Land north of Burrell Road as a residential site allocation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26644

Object

Chapter 6 - Vision and Objectives**Respondent:** Silverton Aggregates Ltd**Summary:**

Support the objective for housing set out in Paragraph 6.8 (2). Also agree with Point 4. that development will be directed to the central Ipswich IP-One area. recognise that, in terms of a sequential test there is no realistic alternative to locating some development in Flood Zone 3. Land north of Burrell Road is located in proximity to the Waterfront and its facilities and services. Its proposed regeneration would contribute to the regeneration of Burrell Road, and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront.

Change suggested by respondent:

Add land north of Burrell Road as a residential site allocation.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26645

Object

Chapter 7 - Key Diagram**Respondent:** Silverton Aggregates Ltd**Summary:**

The location of the IP-One area in Diagram 3 is supported, however it is considered that the extent of the Waterfront and the proposed location for major housing development could be extended westwards, especially in light of proposed allocations IP031a and IP031b for residential development. In doing so, this would incorporate the site to the north of Burrell Road, which is a suitable, available and deliverable site which is capable of accommodating residential development to meet the unmet need within the Borough. The site should therefore be allocated for residential development.

Change suggested by respondent:

Extend the Waterfront Boundary.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26646

Object

Policy ISPA1 Growth in the Ipswich Strategic Planning Area**Respondent:** Silverton Aggregates Ltd**Summary:**

Discrepancy in the housing need figures agreed across the HMA. Understood the IPSA agreed SOCG 2020, and a copy of this is available on the IBC website signed January 2020 (see table 1). The East Suffolk Final Draft Local Plan relies on the standard methodology based on the 2016 household projections, whereas the IBC Local Plan Review focusses on the 2014 household projections, thus reducing their housing need figure. Without further clarification with regards to the discrepancies between these projections, it is unclear whether the Council's emerging Local Plan meets the tests of soundness, as outlined in NPPF 35.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26647

Object

Policy CS2 The Location and Nature of Development**Respondent:** Silverton Aggregates Ltd**Summary:**

Support Policy CS2. Agree that town centre, Portman Quarter and Waterfront will receive the highest densities of development, including high-density housing developments, with medium density and locally focused facilities to be provided elsewhere in IP-One and within and around district centres, with lower density development elsewhere. Recognised that this approach will: maximise opportunities to re-use previously developed land within central Ipswich; ensure that new housing is provided close to local shops, facilities and transport nodes; and support the ongoing regeneration of central Ipswich and particularly of the Waterfront and town centre. Allocating Land north of Burrell Road would achieve this.

Change suggested by respondent:

Allocate Land north of Burrell Road for residential development.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26648

Object

Policy CS3 IP-One Area Action Plan**Respondent:** Silverton Aggregates Ltd**Summary:**

Concerned that the Action Plan does not make the most of allocating previously developed land for residential development. Therefore considered that the emerging Local Plan does not meet the tests of soundness in terms of ensuring the consistent delivery of housing in accordance with Paragraph 35 of the NPPF. considered that a greater number of short to medium scale sites should be allocated to ensure the consistent delivery of housing within the Borough. Land to the north of Burrell Road offers an opportunity to accommodate a degree of residential development in the short to medium term.

Change suggested by respondent:

Allocate land north of Burrell Road for residential development.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26649

Object

Policy CS7 The Amount of Housing Required**Respondent:** Silverton Aggregates Ltd**Summary:**

HDT identifies IBC only able to deliver 46% of identified need. Now requires a 20% buffer. Concerning paragraph 8.108 doesn't reference 20% buffer. Greater number of short/ medium-scale developments required to ensure consistent delivery. The Draft HDAP supports enhancement of small and medium-sized housebuilders, this is agreed. Our client willing to explore this developer consortium opportunities, exemplified though the current purchase of the neighbouring site. CS7 expects that 700 dwellings (50 annum) will be delivered on small windfall sites. Concerning AMR (2017-18) shows only 47 delivered. The Site would contribute to delivery of windfall. Support 100% PDL development in IP-One.

Change suggested by respondent:

Allocate site to the north of Burrell Road for residential development.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26650

Object

Policy DM33 Protection of Employment Land**Respondent:** Silverton Aggregates Ltd**Summary:**

Support that outside of defined Employment Areas, the conversion, change of use or redevelopment of sites and premises in employment use to non-employment uses will be permitted, subject to criteria c - e. Land at Burrell Road is located outside of defined Employment Areas, and it is considered that the redevelopment of the site to residential use would be a more effective use of land in accordance with Paragraph 117 of the NPPF. The proposed development is also compatible with the surrounding uses which comprise predominantly residential uses. The site should therefore be included as an allocation for residential development.

Change suggested by respondent:

The site should be included as an allocation for residential development.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26281

Support

Policy DM5 Protection of Open Spaces, Sport and Recreation**Respondent:** Sport England**Summary:**

We support the revisions to this policy, with regard to sites of low quality, which will ensure that sites are not deliberately neglected in order to assist their redevelopment.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

26282

Support

Policy DM12 Design and Character**Respondent:** Sport England**Summary:**

We support this policy, as it adds supporting text promoting the use of Sport England's 'Active Design' guidance.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26280

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Sport England**Summary:**

Sport England are broadly supportive of this policy, but have concerns regarding the reference to 'dual use playing fields'.

It is considered that the policy requirement for outdoor sport should not include school playing fields, as these are not always made available for public use, and over use can affect their quality.

The requirement for replacement playing fields for Ipswich School must be in addition to the policy requirements for community outdoor sport provision.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26177

Support

Chapter 6 - Vision and Objectives

Respondent: Suffolk Constabulary

Summary:

Suffolk Constabulary does not have any further comments to make relating to the soundness or legal compliance of this document. May I take this opportunity to acknowledge the positive enhancements to the local plan in terms of the adherence with security measures. Partnership working in this way will ensure that all opportunities to design out crime are taken at the earliest stage in the process, helping to keep our communities safer and providing homeowners and businesses with a clear framework within which to operate.

Change suggested by respondent:

N/A

Legally Yes

compliant:

Sound: Yes

Comply with Not specified
duty:

Attachments:

26573

Object

Chapter 10 - Implementation

Respondent: Suffolk County Council

Summary:

Table 8a is not in line with NPPF p.34 which explains that plans should set out the contributions expected from development. The plan needs updating to meet this requirement. Early Years: regarding demand in Gipping Ward, the table states that a new setting (e.g. a day nursery) is required, but no site is stated. IP279 would be the County Council's preference. Primary provision: Cliff Lane Primary should be added to Table 8a for expansion. Secondary provision: Stoke High School and Chantry Academy are identified for expansion. SCC has reassessed and now considers that only Stoke High School needs to expand.

Change suggested by respondent:

The County Council will work with the Borough in reviewing the wording and costs in the table and will agree matters through a Statement of Common Ground. Early Years: IP279 would be the County Council's preferred choice for a setting in Gipping Ward. The site sheet and entry in Table 1 of the Site Allocation Policies document should also be updated in line with this amendment. Primary provision: Cliff Lane Primary should be added to Table 8a (for expansion). Secondary provision: depending on the rate of delivery within Ipswich Garden Suburb, the Council considers that now only Stoke High School needs to expand.

Legally Not specified

compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26579

Object

Policy ISPA4 Cross Boundary Working to Deliver Sites**Respondent:** Suffolk County Council**Summary:**

The County Council welcomes the commitment to coordinate development across boundaries. This area is outside district or local centres buffers defined on Plan 1. NPPF p.92 states that planning policies should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. P.103 states that the planning system should limit the need to travel, through an appropriate mix of uses. To enable access to services and make future communities in the area defined by ISPA4 sustainable, the policy should state the masterplanning of the site should also consider the inclusion of a local centre.

Change suggested by respondent:

In order to enable access to services and make future communities in the area defined by ISPA4 sustainable, the policy should state the masterplanning of the site should also consider the inclusion of a local centre. This will also help to keep the plan more internally consistent e.g. with paragraph 6.17.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26574

Object

Policy CS20 Key Transport Proposals**Respondent:** Suffolk County Council**Summary:**

Reference to the Transport Mitigation Strategy for the ISPA is welcome and supported, as is the focus on sustainable transport measures. SCC Transport Model highlights that growth in Ipswich and surrounding districts may cause severe impacts on the highway network within and around Ipswich, which cannot be addressed through improvements to the highway alone. The County Council considers the appropriate strategy to be maximising sustainable transport in order to achieve a significant proportion of modal shift in both the new and existing population. The Suffolk County Council Transport Mitigation Strategy needs to be included in the Local Plan evidence base.

Change suggested by respondent:

The Suffolk County Council Transport Mitigation Strategy needs to be included in the Local Plan evidence base.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26593

Object

Policy DM4 Development and Flood Risk**Respondent:** Suffolk County Council**Summary:**

NPPF p.165 states "Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate." DM4a) states "... and wherever practicable appropriate application of Sustainable Drainage Systems (SuDS)". Planning practice guidance paragraphs 082 and 083 uses the term "practicable" in reference deciding the most appropriate type, operation and maintenance of SUDS on a site, not the principle of using SUDS . The guidance makes a distinction between the terms "inappropriate" and "practicable". The current wording of the policy is not consistent and could cause confusion. The words "where practicable" should be removed from the policy.

Change suggested by respondent:

The words "where practicable" should be removed from the policy. The SFRA needs further work arising from Environment Agency data. SCC will assist the Borough in further developing this piece of evidence.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26576

Object

Policy DM21 Transport and Access in New Developments**Respondent:** Suffolk County Council**Summary:**

DM21 is not in line with national policy in relation to the lack of explanation as to when travel plans are required. The importance of travel plans in achieving modal shift is stated in the SCC Transport Mitigation Strategy for ISPA. A similar approach should be taken with Travel Plans as for Transport Statements and Assessments. The Plan's explanatory text should refer to the indicative threshold set out in County Council guidance, with the caveat that in some sensitive areas, e.g. affecting Air Quality Management Areas, full travel plans may be required where normally Travel Plan Measures would be acceptable.

Change suggested by respondent:

Amendments to the policy are recommended below.

Final paragraph of policy: "The Council will expect (delete: major) development proposals to provide a travel plan or travel plan measures where appropriate, to explain how sustainable patterns of travel to and from the site will be achieved."

Amend paragraph 9.21.8 to further explain the travel plan guidance and what is determined to be appropriate. "The County Council's Suffolk Travel Plan Guidance, which contains indicative thresholds, will be used to determine the need for a Travel Plan or Travel Plan Measures. Some smaller sites which do not meet the requirements for a full Travel Plan, but are in sensitive locations may require a full Travel Plan to help mitigate traffic impacts."

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26584

Object

Policy DM22 Car and Cycle Parking in New Development**Respondent:** Suffolk County Council**Summary:**

The central parking core is defined in the IP1 area policies map. The West of the town centre (outside the core) has predominantly being for long stay parking (associated with offices/station). DM-22 states that no non-residential long stay car parks will be permitted. It is not clear whether this applies to the whole IP1 area or just the central parking area. The supporting text clarifies that it is for central parking core but to avoid inadvertently encouraging car use and increasing congestion, the control of the supply of additional long-stay spaces must be extended to the whole IP1 area.

Change suggested by respondent:

The control of the supply of additional long-stay spaces must be extended to the whole IP1 area. Whilst there is some definition of operational parking through reference to staff parking not being included (para.9.22.8), examples of what would be included would provide a positive position. This could include spaces for deliveries, visitor spaces and potentially spaces for staff who use private transport for visiting clients for example. The county council would welcome the opportunity to discuss how the approach to operational and staff parking within the IP1 area could be effective.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26244

Object

Policy DM11 Countryside**Respondent:** Suffolk Preservation Society**Summary:**

The Suffolk Coasts and Heaths Area of Outstanding Natural Beauty is only referred to in policy DM11 in terms of major development within the AONB. The policy should relate to all development both in, and within the setting of, the AONB. We suggest that the policy is reworded so that it is clear that it fulfils the statutory duty under section 85 of the 2000 CROW Act.

Change suggested by respondent:

We suggest that the policy is reworded so that it is clear that it fulfils the statutory duty under section 85 of the 2000 CROW Act which requires that 'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'.

Legally No**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26314

Object

Chapter 5 - Ipswich - The Place**Respondent:** Suffolk Wildlife Trust**Summary:**

Biodiversity Section currently states – “The need to halt biodiversity net loss.” Suggest this is amended to state - “Prevent loss of biodiversity and implement measures for biodiversity net gain.” The government is mandating that, through the new Environment Bill, all development (with a few exceptions) will be required to secure gains in biodiversity. It is therefore not sufficient to state that there will be a halt in net loss.

Change suggested by respondent:

Amend biodiversity section to "Prevent loss of biodiversity and implement measures for biodiversity net gain."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26316

Object

Chapter 6 - Vision and Objectives**Respondent:** Suffolk Wildlife Trust**Summary:**

“9. NATURAL ENVIRONMENT – To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use.” Consider addition of reference to ecological networks and connectivity. NPPF references the need to establish, conserve, restore and enhance ecological networks under Paragraphs 173-d. and 174-b.

Change suggested by respondent:

Consider addition of reference to ecological networks and connectivity.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26321

Object

Policy ISPA2 Strategic Infrastructure Priorities**Respondent:** Suffolk Wildlife Trust**Summary:**

We consider that policy ISPA2 should also include delivery of strategic green infrastructure alongside the other types of infrastructure listed.

Change suggested by respondent:

Include "strategic green infrastructure" in the list of infrastructure priorities.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26327

Object

Plan 5 Ipswich Ecological Network**Respondent:** Suffolk Wildlife Trust**Summary:**

Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F, forming the semi-natural habitat link between the south-western boundary of Landseer Park Carr County Wildlife Site (CWS) and the western boundary of the Volvo Raeburn Road CWS. If these sites are fully developed, this ecological network would be interrupted. This is the longest existing ecological network in Ipswich, and if sensitive development is undertaken in the Ravenswood area, then this corridor could be continued to the east. See suggested extension route. Map refers to Wildlife Audit 2012/2013, which is out-of-date (see 2019 update).

Change suggested by respondent:

Extend Green Corridor F as suggested. Update Map to 2019.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26328

Object

Plan 6 Green Corridors**Respondent:** Suffolk Wildlife Trust**Summary:**

Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F, forming the semi-natural habitat link between the south-western boundary of Landseer Park Carr County Wildlife Site (CWS) and the western boundary of the Volvo Raeburn Road CWS. If these sites are fully developed, this ecological network would be interrupted. This is the longest existing ecological network in Ipswich, and if sensitive development is undertaken in the Ravenswood area, then this corridor could be continued to the east. See suggested extension route.

Change suggested by respondent:

Extend Green Corridor F as suggested.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26317

Object

Policy DM8 The Natural Environment**Respondent:** Suffolk Wildlife Trust**Summary:**

Conditions a. and c. in relation to SSSI's clearly conflict with Paragraph 175b of the NPPF which only allows for Condition b. (benefits outweighing impacts). This Policy should be updated to reflect this.

Change suggested by respondent:

Delete conditions a and c.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26326

Object

Policy DM10 Green Corridors**Respondent:** Suffolk Wildlife Trust**Summary:**

Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F, forming the semi-natural habitat link between the south-western boundary of Landseer Park Carr County Wildlife Site (CWS) and the western boundary of the Volvo Raeburn Road CWS. If these sites are fully developed, this ecological network would be interrupted. This is the longest existing ecological network in Ipswich, and if sensitive development is undertaken in the Ravenswood area, then this corridor could be continued to the east. See suggested extension route.

Change suggested by respondent:

Extend Green Corridor F as suggested.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26318

Object

Policy DM12 Design and Character**Respondent:** Suffolk Wildlife Trust**Summary:**

In Policy DM12, point d. there should be an inclusion of the potential for installation of green roofs and walls as part of the strategy to introduce greener streets and spaces. This would make a more robust argument for the requirement for net gains in biodiversity.

Change suggested by respondent:

point d. there should be an inclusion of the potential for installation of green roofs and walls as part of the strategy to introduce greener streets and spaces.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26320

Object

Policy DM15 Tall Buildings**Respondent:** Suffolk Wildlife Trust**Summary:**

We have been informed by the RSPB that a suggestion was made to add a further point to DM15 – Tall Buildings with regards to the provision of swift bricks in new buildings. This is a sentiment we share at the Suffolk Wildlife Trust, and we note that there are no references to Green Space or biodiversity measures within this policy, which appears to be a valuable missed opportunity. We propose the addition of a further point: k. to incorporate integrated swift bricks". In addition to this, other biodiversity features could be noted here, such as the provision of green walls and roofs which would help meet the biodiversity net gain requirements.

Change suggested by respondent:

Insert criterion K "to incorporate integrated swift bricks" into policy wording.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26575

Object

Chapter 9 - Development Management Policies, Policy DM17 Small Scale Infill and Backland Residential Developments**Respondent:** Suffolk Wildlife Trust**Summary:**

In addition to the points made under Policy DM17 regarding small scale residential developments for infill, backland or severance plots, a point should also be made to deny permission for any development which could result in an unacceptable loss of semi-natural habitat, which could be important in its own right, or support protected and/or priority species.

Change suggested by respondent:

Add a point to the policy to deny permission for any development which could result in an unacceptable loss of semi-natural habitat, which could be important in its own right, or support protected and/or priority species

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26240

Object

Appendix 6 - Marketing Requirements**Respondent:** Theatres Trust**Summary:**

Suggest a minor amendment to Appendix 6 to further improve its robustness reflecting comments we submitted at the previous stage. We suggest paragraph 2.2 requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. This would prevent applicants undermining the policy objective by superficially addressing policy, for example listing with small agents in other parts of the country or listing commercial property with residential agents.

Change suggested by respondent:

Amend paragraph 2.2 to include "requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility."

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26236

Object

Policy DM28 Arts, Culture and Tourism (formerly policy SP14)**Respondent:** Theatres Trust**Summary:**

Support this policy and the protection afforded to the borough's valued facilities. We would suggest a minor amendment to Appendix 6 to further improve its robustness reflecting comments we submitted at the previous stage. We suggest paragraph 2.2 requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. This would prevent applicants undermining the policy objective by superficially addressing policy, for example listing with small agents in other parts of the country or listing commercial property with residential agents. Otherwise this policy meets the tests of soundness.

Change suggested by respondent:

Suggest paragraph 2.2 requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26466

Object

Policy DM27 The Central Shopping Area**Respondent:** Threadneedle UK Property Authorised Investment Fund**Agent:** Threadneedle UK Property Authorised Investment Fund**Summary:**

Note efforts made by Council to reflect previous representation, moving towards allowing greater flexibility of uses within Central Shopping Area. Whilst consider that greater flexibility could be achieved through Policy wording to ensure future town centre vitality and viability, understand that Council will take a pragmatic approach to future applications that exceed proposed thresholds depending on situations faced by the retail market - embedded within Policy wording. However, recommend change to policy position for Primary Shopping Zones to include D2 and C1. Such uses can provide active frontages. Therefore should not be excluded from operations permitted in Primary Shopping Zone.

Change suggested by respondent:

Changes to Policy DM27 wording as follows:

"The Council will not grant planning permission for the use of a ground floor unit to a use falling outside classes A1 to A5, D2 and C1 in Primary Shopping Zones..."

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26290

Support

Policy CS11 Gypsy and Traveller Accommodation**Respondent:** West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council)**Summary:**

This policy seeks to "provide for additional pitches... where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision"... This appears to be positively prepared. West Suffolk Council supports the provision of appropriate pitches to meet the identified need which will be secured through the policy.

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

26291

Object

Policy CS20 Key Transport Proposals**Respondent:** West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council)**Summary:**

“Key transport proposals needed to mitigate the traffic impacts within Ipswich of planned growth...” In order to be effective, it is suggested that criteria (i) is added, “improvements to the rail line.” This will enable matters such as the Ipswich to Cambridge rail line to remain a strategic priority. The East West Rail Eastern Section Group is actively working to increase passenger rail frequencies.

Change suggested by respondent:

Add criterion i; “improvements to the rail line.”

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

26249

Object

Chapter 10 - Implementation**Respondent:** Mrs D Wiseman**Summary:**

Table 8B: Unclear whether infrastructure improvements to Fonnereau Way relate to exiting route currently defined or amended route within country park.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26253

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Mrs D Wiseman**Summary:**

Unclear whether infrastructure improvements to Fonnereau Way relate to exiting route currently defined or amended route within country park.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26250

Object

Chapter 10 - Implementation**Respondent:** Mrs D Wiseman**Summary:**

Table 8B: Comments below relate only to section cutting through the dwelling (Broadacres). NPPF paragraphs 58 and 69 and Section 18 of Crime and Disorder Act 1998 quoted. In the SPD, planned enhancement to northern end of Fonnereau Way wouldn't meet these acts/ policies. The existing way at Broadacres doesn't meet these acts and promotes anti-social behaviour. Suffolk Constabulary letter to IBC (August 2016) quoted. SPD an opportunity to phase out Broadacres route and eradicate threat of crime, vandalism and anti-social behaviour by keeping route within country park.

Change suggested by respondent:

The route through Broadacres should be phased out through the enhancements to the northern end of Fonnereau Way. The route should be confined to the country park.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26251

Object

Policy CS10 Ipswich Garden Suburb**Respondent:** Mrs D Wiseman**Summary:**

Comments below relate only to section cutting through the dwelling (Broadacres). NPPF paragraphs 58 and 69 and Section 18 of Crime and Disorder Act 1998 quoted. In the SPD, planned enhancement to northern end of Fonnereau Way wouldn't meet these acts/ policies. The existing way at Broadacres doesn't meet these acts and promotes anti-social behaviour. Suffolk Constabulary letter to IBC (August 2016) quoted. SPD an opportunity to phase out Broadacres route and eradicate threat of crime, vandalism and anti-social behaviour by keeping route within country park.

Change suggested by respondent:

The route through Broadacres should be phased out through the enhancements to the northern end of Fonnereau Way.
The route should be confined to the country park.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

**Site Allocations and Policies (Incorporating IP-One
Area Action Plan) DPD Review Final Draft**

Record count: 136

26183**Object****Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood****Respondent:** Mrs Helen Abbott**Summary:**

There would be a significant detrimental impact to the local transport network which is already an issue on the estate. With only one entrance/exit there are already problems with access, particularly during the morning and evening rush hour which is not helped by the passing traffic blocking the main roundabout on Nacton Road, and also the additional traffic at McDonald's on the Ravenswood roundabout. Adding additional housing to this already hugely congested area and potentially upwards of 250 extra vehicles (realistically this would be more!) is irresponsible without a major revision to the access points provided onto/off of the estate.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:**26319****Object****Site Sheets, Site Ref: IP054b (Policy SP2) Land between Old Cattle Market & Star Lane****Respondent:** Mr Norman Agran**Agent:** Bidwells**Summary:**

IP054b proposed solely for residential use. No objection to residential allocation but objection to removal of commercial allocation as per adopted Local Plan. Policy approach does not reflect current land uses, too rigid and inconsistent with NPPF. Therefore, unsound. IP054b highlighted in Ipswich Economic Area Employment Land Supply Assessment and site sheets acknowledge existing uses - established commercial units.

Recognise aspiration to maximise housing on sustainably located brownfield land but request greater flexibility for continuation of existing uses.

Allocation would result in restriction of expansion for existing businesses. Request a more flexible approach - revert to residential and/or commercial uses.

Change suggested by respondent:

Change to mixed-use residential/ commercial allocation as per adopted Local Plan.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26285

Object

Policy SP7 – Land Allocated for Leisure Uses or Community Facilities**Respondent:** AONB**Summary:**

Site IP150b which is being proposed for sport uses lies within the setting to the Suffolk Coast & Heaths AONB. Flood lighting has the potential to impact on the AONB. The site sheet and relevant section in Policy SP7 fails to identify the AONB as a constraint. The site sheet and policy needs to be amended to reflect this. Assessment of impact on the AONB is also needed.

Change suggested by respondent:

Site sheet needs to be amended to identify the AONB as a constraint and to identify the need to assess the impact on the AONB.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26268

Support

Site Sheets, Site Ref: IP149 (Policy SP8) Pond Hall Farm**Respondent:** AONB**Summary:**

The AONB team maintains its support for the inclusion of land at Pond Hall Farm as an extension to Orwell Country Park

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments: None

26259

Object

Site Sheets, Site Ref: IP141a (Policy SP5) Land at Futura Park, Nacton Road (formerly the Cranes Site)**Respondent:** AONB**Summary:**

The Futura Park sites lies within 200m of the boundary of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and therefore lies within the setting of the nationally designated landscape. Whilst we acknowledge that much of this site is already built out and is physically separated from the AONB by the A1189, any future development especially site IP141a should be supported by an assessment of impacts on the Natural Beauty of the AONB. The need for such an assessment should be reflected in the policy text for this site.

Change suggested by respondent:

The need for an assessment of the AONB should be reflected in the policy text for site.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

26267

Object

Site Sheets, Site Ref: IP150b (Policy SP7) Land south of Ravenswood**Respondent:** AONB**Summary:**

Site IP150b which is being proposed for sport uses lies within the setting to the Suffolk Coast & Heaths AONB. Flood lighting has the potential to impact on the AONB. The site sheet and relevant section in Policy SP7 fails to identify the AONB as a constraint. The site sheet and policy needs to be amended to reflect this. Assessment of impact on the AONB is also needed.

Change suggested by respondent:

Site sheet needs to be amended to identify the AONB as a constraint and to identify the need to assess the impact on the AONB.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

26437

Object

Policy SP5 – Land Allocated for Employment Use**Respondent:** AquiGen**Agent:** AquiGen**Summary:**

Land allocated in Table 3 (28.34ha) is significantly in excess of calculated requirement from Evidence Base (23.2ha). The 5.14ha difference equates to 18% of the requirement. Such over provision can only be justified where there are clear reasons for a land supply buffer. No such evidence has been presented in the Plan or Evidence Base. Appropriate to consider reducing the land allocation to reflect actual need. Of the land allocated in Table 3, circa 24ha has been identified as being suitable for industrial uses. This is in significant excess of the 9ha need calculated by the Employment Land Needs Assessment.

Change suggested by respondent:

Review land allocations in SP5 and change so they better reflect the actual need calculated in the Evidence Base.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26433

Object

Site Sheets, Site Ref: IP141a (Policy SP5) Land at Futura Park, Nacton Road (formerly the Cranes Site)**Respondent:** AquiGen**Agent:** AquiGen**Summary:**

Consider sites should be removed from employment use allocation. After extensive marketing, no interest in Site 1 for B Class uses, despite designation within New Anglia Enterprise Zone. Site 1 has different townscape character due to proximity to residential properties, relationship with Ravenswood Centre and Nacton Road frontage. Could accommodate non B Class uses benefiting from road-side prominence and pedestrian accessibility - economic and social benefits for area. Plans for Site 3 have met B Class demands. Removal will not impact on employment land supply due to over allocation. If retained, changes needed to "Development constraints/issues" text. Current wording restrictive.

Change suggested by respondent:

Remove employment allocation or change constraints/issues text as follows:

-Remove phrase "...and avoids utilitarian single volume warehousing" to ensure plan is sufficiently flexible and allows schemes to be justified on their own merits.

-Change text to: " Development along IP141a should explore the ability to address both Nacton Road and Crane Boulevard with active and/or positively designed frontage, and avoid being set back from the highway by extensive car parking to allow for greater street scene impact, unless this can be justified as an appropriate response" to provide flexibility and support delivery of site 1.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26483

Object

Policy SP6 – Land Allocated and Protected as Open Space**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP objects to the requirement that the Island Site provides 15% open space which is more than the minimum amount of on-site public open space provision required through Core Strategy Review Policy DM6. Until the completion of the masterplan exercise and the necessary technical assessments accompanying it, it is not appropriate for the DPD to be so prescriptive about the amount of open space to be provided and we would request the removal of reference to it.

Change suggested by respondent:

Remove reference to requirement of 15% open space at Island Site.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26484

Support

Policy SP7 – Land Allocated for Leisure Uses or Community Facilities**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP supports the Council's position that the amount of land for leisure or community uses on the Island Site should be determined through masterplanning. Whether there is a need to make provision for early years facilities is a matter best addressed through that masterplanning exercise.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26486

Object

Policy SP9 - Safeguarding Land for Transport Infrastructure**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Objection to inclusion in IP037 allocation of need for "additional vehicular access to the Island Site to enable the site's development". Not appropriate to be so prescriptive - request removal. Objection to inclusion in IP037 allocation of wording: "development layout should not prejudice future provision of a Wet Dock Crossing". Given there is no formal commitment, not appropriate for Policies Map IP – One Area Inset to define alignment of potential route and for SP9 to effectively safeguard this. Whilst this may not be the intention, the wording can be interpreted this way. Request appropriate amendment.

Change suggested by respondent:

Request removal of reference to the need for "additional vehicular access to the Island Site to enable the site's development".

Request appropriate amendment to Policy SP9 and/or Policies Map IP – One Area Inset concerning the provision of a wet dock crossing.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26656

Object

Site Sheets, Site Ref: IP037 (Policy SP2, SP6, SP15 & SP15) Island Site**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Support allocation for residential/residential-led mixed use. Will work with IBC to agree masterplan to deliver regeneration objectives subject to commercial viability. Vision for site (agreed with partners and the LEP) does not envisage 'high density' development. Indicative capacity (421 homes) considered high. Consider Island Site will deliver reduced density of approx. 150 units. Development should be sensitive to existing site uses. Disagree with reference to requirement of road bridge to enable development at Island Site. Access required dependent on development - reduced density may not require additional access. Object to requirement of 15% open space - more than minimum requirement.

Change suggested by respondent:

Reduce capacity to 150 units.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26479

Object

Policy SP1 - The Protection of Allocated Sites**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Support the safeguarding of sites for the uses for which they have been allocated, subject to the recognition that where sites (such as the Island Site) are in existing use and are allocated for alternative use(s), redevelopment will be dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for redevelopment, such sites should reasonably be able to continue in their existing use. In the case of the Island Site, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26482

Object

Policy SP2 - Land Allocated for Housing**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Support allocation of the Island Site for residential/residential-led mixed use. Support references (paragraphs 4.7 and 4.10) that figures included in table 1a are "indicative".

Will work with IBC to agree deliverable masterplan to deliver Council's regeneration objectives subject to commercial viability.

Indicative capacity of 421 homes considered to be high. Consider that the Island Site will deliver a reduced density of approximately 150 units.

Considered inappropriate for Policy to refer to need for "additional vehicular ... access (including emergency access)...to be provided to enable the site's development". Matter should be addressed in the masterplan preparation - request reference is removed.

Change suggested by respondent:

Request removal of reference to need for "additional vehicular ... access (including emergency access)...to be provided to enable the site's development".

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26487

Support

Policy SP11 – The Waterfront**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP supports Policy SP11 and welcomes the recognition at para 5.21 of the need for new development to take account of the Port's operational needs.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26488

Support

Policy SP15 – Improving Pedestrian and Cycle Routes**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

ABP supports the aspiration for a safe cycle and pedestrian access across the lock gates at the entrance to the Wet Dock to create a circular route subject to viability and ensuring Port operations are not compromised. ABP also supports the provision of new foot and cycle bridges across the New Cut linking Stoke Quay to St Peter's Wharf and the Island site to Felaw Street subject to the provision of such bridges being supported by public funding.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26489

Object

Policy SP16 – Transport Proposals in IP-One**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Welcome intention to continue to make case for highway improvements including Wet Dock Crossing. However, in context of development of the Island Site, provision of Wet Dock Crossing is not a pre-requisite to enable development. Disagree with inclusion of statement (para 5.42) that "which as a minimum will require a road bridge from the west bank to the Island Site... to enable any significant development" - request removal. Need for access will depend on development established through masterplanning. Until established, not appropriate for the DPD to be so prescriptive - request removal of reference.

Change suggested by respondent:

Request removal of reference:

"which as a minimum will require a road bridge from the west bank to the Island Site... to enable any significant development"

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26490

Object

Opportunity Area A – Island Site**Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Welcomes statement that Opportunity Area descriptions, development principles and plans will act as concept plans to guide the development and should be adhered to unless evidence indicates a better approach to deliver plan objectives. Notes statement that allocation policies of the DPD take precedence over Opportunity Area guidance and site sheets - notes that there are discrepancies between these respective parts of the DPD which would benefit from clarification. Request changes to text under "Opportunity Area A – Island Site".

Change suggested by respondent:

Under 'Development Opportunities'

- Concern about the amount of green areas including reinstatement of the tree lined promenade required.
- The old lock gate area is not suitable for leisure uses.
- Live Work units may not be viable in this location.
- Office use (other than small scale) is not considered appropriate in this location.
- The potential for small scale retail / café / restaurants will be subject to viability and market demand.

Under 'Development Principles'.

- The retention of historic structures may be unviable to retain.
- Reinterpretation of the historic lock as a focus to new public space may not be compatible with operational and safety requirements.
- Generally low to medium rise development (3, 4 and 5 storeys).
- The requirement for vehicular access (including 73 emergency vehicles) and bridge across New Cut to link to Felaw Street is yet to be established and may not be necessary.
- What is meant by "prejudice to the potential provision of a full Wet Dock Crossing" needs to be better understood in the context of this being no more than an aspiration.
- Layout to facilitate location of new foot/cycle bridge from New Cut to St Peter's Wharf (it is not clear what this means).
- Ensure suitable public transport provision (it is not clear how this is expected to be achieved).

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26344

Support

Site Sheets, Site Ref: IP309 (Policy SP2) Former Bridgeward Social Club, 68a Austin Street**Respondent:** Austin Street Projects Ltd**Agent:** Austin Street Projects Ltd**Summary:**

Site lies within central Ipswich 'IP-One' Area, identified as a principle area for development. Located close to town, accessible transport links, employment and retail areas, and other key amenities. Intention to redevelop site in coming years, to deliver high quality, predominantly affordable housing. Proposals will seek to ensure full residential potential realised, meeting principles of good urban design and addressing identified local need. Keen to work with IBC to ensure correct approach - balance need to maximise development with respecting local environment. Opportunity for immediate housing delivery contribution within Borough. Efficient use of brownfield site. Consider plan to be sound.

Change suggested by respondent:

N/A

**Legally Not specified
compliant:**

Sound: Yes

**Comply with Not specified
duty:**

Attachments:

26577

Object

Policy SP2 - Land Allocated for Housing**Respondent:** Bloor Homes**Summary:**

Bloor Homes are promoting land at Humber Doucy Lane, Rushmere St Andrew, (see Site Location Plan Appendix A). Land is situated within both the Ipswich Borough and East Suffolk District. Approximately 115 hectares in size. It presents both a shorter term opportunity for a smaller scheme and a medium-long term opportunity for a larger scale Garden Village development. Development Framework Plans are included (Appendix B). Concerns were raised in relation to the cross boundary approach of working with Ipswich Council and the Site was promoted for a large scale opportunity. The relevant Hearing Statements are included at Appendix C.

Change suggested by respondent:

Include identified site at Humber Doucy Lane as a residential-led allocation.

**Legally Not specified
compliant:**

Sound: No

**Comply with Not specified
duty:**

Attachments:

26198

Object

Site Sheets, Site Ref: IP061 (Policy SP2 & SP6) Former School Site, Lavenham Road**Respondent:** Mr Gary Butcher**Summary:**

Object. The green field is an important wildlife stepping stone and is used by the local residents for leisure which is a benefit to fitness, social interaction and mental well being. Lavenham Road and Kelly Road can not support the extra traffic this housing development would create if it went ahead. This blocks emergency access. Amongst other wildlife present on the green (as highlighted in the Suffolk Wildlife Trust report 2019) there are additional bats nesting which have not been picked up by the report. The national bat association will be made aware of the bat presence.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26578

Object

Policy SP3 - Land with Planning Permission or Awaiting a Section 106, IP206 – Cranfields, College Street**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company supports the intentions underlying Policy SP3 and, in particular, the identification of Sites IP206 and IP211. The Company still considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035). Summary: Object for the reasons set out above.

Change suggested by respondent:

Increase capacity of site by up to 50%.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26580**Object****Policy SP3 - Land with Planning Permission or Awaiting a Section 106, IP211 – Regatta Quay, Key Street****Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company supports the intentions underlying Policy SP3 and, in particular, the identification of Sites IP206 and IP211. The Company still considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035). Summary: Object for the reasons set out above.

Change suggested by respondent:

Increase residential capacity by up to 50%.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26569****Support****Chapter 5 - IP-One Area****Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company supports the general vision for the IP-One area (see also representations made with respect to Core Strategy Chapter 6: Vision and Objectives and Spatial Strategy). Summary: General support

Change suggested by respondent:

N/A

Legally Not specified**compliant:****Sound:** Yes**Comply with** Not specified**duty:****Attachments:**

26566**Object****Site Sheets, Site Ref: IP035 (Policy SP2) Key Street/ Star Lane/ Burtons (St Peter's Port)****Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

Welcome but site has greater capacity than is indicated – required to make development viable. Number of abnormal development costs: Archaeology, hydrology, listed buildings, land contamination, flooding, air quality, design restriction (listed churches). Costs of developing the site are very high. To be justified, much higher number of dwellings, and greater density, required. Needs to incorporate parking for new residential units, together with parking for parts of IP206 and IP211, which have not yet been built out. If remaining parts of these developments are to be brought forward some parking must be provided on an adjacent, accessible, site.

Change suggested by respondent:

Increase the residential capacity of site IP035. Needs to be reference to future development of IP035 having to incorporate an element of car parking, for both residential units to be accommodated thereon and for further residential units to be developed on IP206 and IP211.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26570**Support****Policy SP11 – The Waterfront****Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company fully supports this Policy. Summary: Support

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26568

Object

Policy SP3 - Land with Planning Permission or Awaiting a Section 106**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company supports the intentions underlying Policy SP3 and, in particular, the identification of Sites IP206 and IP211. The Company still considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035). Summary: Object for the reasons set out above.

Change suggested by respondent:

Increase residential capacity by up to 50%.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26571

Object

Policy SP15 – Improving Pedestrian and Cycle Routes**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

The Company supports the general thrust of the Policy, including the proposals to improve pedestrian links between the Central Shopping Area and Waterfront. However, there are still serious concerns about how these proposals impact upon the development of Site IP035. Summary: Qualified Support

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26572

Object

Opportunity Area B – Merchant Quarter**Respondent:** Cardinal Lofts (Mill) Ltd**Agent:** Cardinal Lofts (Mill) Ltd**Summary:**

Company controls important sites in the Merchants Quarter. Concerned that the Development Options plan, together with the Development Principles, are not sound in that they will render development unviable and frustrate proposals to bring sites forward. Whilst do not take issue with the objectives for the Merchants Quarter, of the view that: North-South Linkages through IP035 are in the wrong location; Proposals for a new 'urban focal space' on IP035 are oversized and over-ambitious; IP035 capable of accommodating buildings of more than five storeys without having adverse impact upon the setting of adjacent listed buildings or historic environment.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26349

Object

Site Sheets, Site Ref: IP279a, b(1) and b(2) (Policy SP2 & SP3) Former British Telecom Office, Bibb Way**Respondent:** Mr Philip Charles**Summary:**

Daily user of Alderman Nature reserve and canal located alongside the BT building. Question as to whether there are plans for developing the area of the nature reserve and canal on Bibb Way in front of the building. Area often frequented by drug users and has become neglected. However, it is a haven for wildlife - badger, otter, bats and foxes seen in past 12 months. Whilst no objection to conversion of building into residential units, concern raised over the potential impacts on local wildlife. Question as to whether development plans would alter the canal or tow path.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26170

Object

Site Sheets, Site Ref: IP354 (Policy SP2) 72 (Old Boatyard) Cullingham Road**Respondent:** Mr Jamie Churchyard**Summary:**

Object for the following reasons; This is in an area at high risk of flooding; Sewage capacity is already overloaded. The loss of the grassed area would exacerbate this; Goldcrest Newts are present in my garden and so are likely to be present on the site; Would worsen parking; Asbestos/ health risks from demolition; Damage to our property from piling/ heavy machinery. Who would be responsible?; Loss of light/ overshadowing; Damage our environment and risk our property to flooding.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26162

Object

Site Sheets, Site Ref: IP307 (Policy SP2) Princes of Wales Drive**Respondent:** Mrs RoseMarie Cornish**Summary:**

Too dense and out of character with the surrounding area. It would be claustrophobic and cause distress with no enhancement or asset to the area. Prince of Wales Drive is a nightmare with parking and the volume of traffic. Halifax School is a bottleneck and results in wide spread on-street parking. Proposed cars will park on the pavement. Loss of views towards River Orwell. Loss of privacy. Noise nuisance. Not within our Human Rights. The shop is a valuable community asset in walking distance, needed due to ageing population. See proposed changes to plan. Green is important habitat for species.

Change suggested by respondent:

Bungalows instead of two storey houses or three storey flats.

Halifax School should be approached in favour of building an extension (Nursery) on the land. This would solve much needed places for children within the area and help alleviate parking problems.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26543

Support

Policy SP7 – Land Allocated for Leisure Uses or Community Facilities**Respondent:** Department for Education (DfE)**Summary:**

DfE supports the Council's prioritisation of education infrastructure, and the allocation and safeguarding of land for schools as set out in the following policies: BT Depot Woodbridge Road (allocation IP129) - SEND School.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26542

Support

Site Sheets, Site Ref: IP010a (Policy SP2, SP7 & SP9) Co-Op Depot Felixstowe Road**Respondent:** Department for Education (DfE)**Summary:**

DfE supports the Council's prioritisation of education infrastructure, and the allocation and safeguarding of land for schools as set out in the following policies: Co-op Depot (Policy SP7/allocation IP010a) – school expansion.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26547

Object

Site Sheets, Site Ref: IP048a (Policy SP2, SP6 & SP17) Mint Quarter/ Cox Lane East Regeration Area

Respondent: Department for Education (DfE)

Summary:

Generic requirements in the overall allocation IP048a cause potential conflict with the delivery of a Primary School expediently at the site. The requirement to develop residential uses at upper floors would not be necessarily wholly deliverable with a Primary School and therefore we propose that the supporting text to the allocation makes clear that residential accommodation should only be provided where feasible and appropriate. The allocation wording is too restrictive regarding retention of the locally listed façade. The requirement for a development brief is unnecessary. The school element should be a separate allocation. (See also SP2 & Opportunity Area C).

Change suggested by respondent:

We propose that: the supporting text to the allocation makes clear that residential accommodation should only be provided where feasible and appropriate; the wording be amended to reflect the requirements in the NPPF regarding assessment of an asset's significance and the distinction between designated and non-designated assets; the development brief requirement be removed; the school component of allocation IP048a be stripped out from the policy and included as a separate allocation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26550

Object

Policy SP2 - Land Allocated for Housing

Respondent: Department for Education (DfE)

Summary:

The allocation wording is too restrictive and could potentially frustrate and delay the delivery of the school. The specification of the retention of the locally listed façade is too specific for a site allocation policy, as it is not clear on what evidence this is based. The requirement for a development brief for the proposed primary school site is also considered to be unnecessary, the need for which is not sufficiently evidenced. We propose that the school component of allocation IP048a be stripped out from the policy and included as a separate allocation for a Primary School only.

Change suggested by respondent:

We propose that the school component of allocation IP048a be stripped out from the policy and included as a separate allocation for a Primary School only.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26549

Object

Opportunity Area C – Mint Quarter and surrounding area**Respondent:** Department for Education (DfE)**Summary:**

The 'Development Principles' for Mint Quarter (Opportunity Area C) set out that development should 'respect and enhance setting of Listed and historic buildings'. This is not considered to wholly comply with the NPPF p.197 which requires an assessment of the asset's significance (with regard to non-designated assets), and a balanced judgement to be made thereafter. NPPF p.184 dictates that assets 'should be conserved in a manner appropriate to their significance', which does not necessarily equate to 'enhancement' in every scenario. The terminology 'historic building' is also not robust or consistent with the NPPF.

Change suggested by respondent:

We propose that the wording be amended to reflect the requirements in the NPPF, and the distinction between designated and non-designated assets.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26420

Support

Chapter 4 - Site Allocations (to make comments on specific Site Allocations please see Appendix 3 Site Allocation Details)**Respondent:** East Suffolk Council**Agent:** East Suffolk Council**Summary:**

The Council notes that a number of policies in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft would support the delivery of transport mitigation in the ISPA. Particularly, the Council notes the potential provision for park and ride facilities under site allocation IP152 Airport Farm Kennels and under Policy SP9, improvement to cycling and walking provision under Policy SP15 and limiting congestion (along with supporting the economy) under Policy SP17.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26284

Object

Chapter 1 - Introduction**Respondent:** Environment Agency**Summary:**

Comments above are mainly pulled from our response to policy DM4 of the local plan. These have been reiterated here in the introduction section to the site allocation document because our comments cannot be site specific until the SFRA and Gipping model are complete.

Change suggested by respondent:

Our full comments and what needs to be changed can be found above.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

26296

Object

Site Sheets, Site Ref: IP307 (Policy SP2) Princes of Wales Drive**Respondent:** Mr Michael Forster**Summary:**

Agree with need for affordable housing, but proposed redevelopment will have adverse effect on area struggling to accommodate parking in Chatsworth Crescent/Prince of Wales Drive. Compounded around school times - roads are sometimes impassable. Even though site is used as overflow, for local residents and during 'school run', there is still not enough parking. What effect will development and 22 allocated parking spaces have on surrounding area? Where will local residents park? How bad will 'school run' congestion become? Inclusion of 3 storey block totally out of character with surrounding structures - loss of privacy and overlooking to adjacent properties.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26166**Object****Site Sheets, Site Ref: IP307 (Policy SP2) Princes of Wales Drive****Respondent:** Mr Terry Forster**Summary:**

Loss of privacy/ overlooking to neighbouring properties. The design does not afford adequate privacy for the occupants of the building or adjacent properties. Contrary to Human Rights Act (Protocol 1) and Article 8 of the Human Rights Act. Visually dominant/ overbearing impact. Too dense and would detract from open feel of the area. Inadequate parking and highway safety concerns, including during school pick up/ drop off. Out of character with the neighbourhood (balance of bungalows and semi's) and out of scale with surroundings. Overshadowing/ loss of light. Over-development of the site (insufficient landscaping). Contrary to Government guidance and Planning Policy.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:**26423****Object****Policy SP4 – Opportunity Sites****Respondent:** Gladman Developments**Summary:**

None of these sites are deliverable or viable. Site IP226 has a non-implemented application for 556 homes, been allocated but not achieved housing completions over the last 20 years, requires business relocation and lies within Flood Zone 3. Given the site's history and constraints, residential development cannot be assumed as suitable or viable. The evidence suggests that the Council's current and continued strategy for delivering homes is flawed. The Council by removing sites from the Local Plan submission draft version have significant concerns over site viability and deliverability, and must look to identify significantly more sites outside the Borough's boundary.

Change suggested by respondent:

Therefore, the Council must look to identify significantly more sites, which are realistically deliverable and outside of the Borough's boundary to meet Ipswich housing needs.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

26419**Object****Policy SP2 - Land Allocated for Housing****Respondent:** Gladman Developments**Summary:**

Fundamental concerns regarding the ability of SP2 sites to viably deliver residential development over the plan period and whether there is a demand for the type of homes that these sites can offer. Some SP2 sites are unavailable and require existing occupiers to relocate and others are heavily constrained by designated heritage assets and areas of archaeological importance. These significant constraints impact the delivery of homes from these sites in principle. Also, the Plan is relying on the delivery of housing from sites in high risk flood zones. The Council should look to identify additional sites outside of its boundary.

Change suggested by respondent:

The Council should look to identify additional sites outside of its boundary in collaboration with neighbouring authorities that are more suitable for residential development than those that are at high risk of flooding within its boundary.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26186**Object****Site Sheets, Site Ref: IP150d (Policy SP2) Land south of Ravenswood****Respondent:** Hallowtree Scout Activity Centre**Summary:**

This area of land borders an AONB which would be negatively affected by additional vehicular traffic in the area. The existing access track to Bridge Wood/Orwell Meadows/Hallowtree Campsite is already in disrepair. Additional traffic in the area would be at the detriment to the properties in the Alnesbourn Priory site. It is a short-sighted effort by the council to boost housing in an area which is unequipped to handle the additional capacity. No work should be allowed to take place. The land must be kept undisturbed which will allow the flora and fauna to develop.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26185**Object****Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood****Respondent:** Hallowtree Scout Activity Centre**Summary:**

This area of land borders an AONB which would be negatively affected by additional vehicular traffic in the area. The existing access track to Bridge Wood/Orwell Meadows/Hallowtree Campsite is already in disrepair. Additional traffic in the area would be at the detriment to the properties in the Alnesbourn Priory site. It is a short-sighted effort by the council to boost housing in an area which is unequipped to handle the additional capacity. No work should be allowed to take place. The land must be kept undisturbed which will allow the flora and fauna to develop.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:**26167****Object****Site Sheets, Site Ref: IP307 (Policy SP2) Princes of Wales Drive****Respondent:** Mr Paul Harvey**Summary:**

There is insufficient car parking for residents and visitors. This will mean nearby roads like Chatsworth Crescent will be subject to increased on-street parking which is exacerbated by school drop off/ collections. This will pose a risk to highway safety. The Co-op have deliberately prolonged the use of the site knowing that after so many years they can apply for a residential application instead of the original purpose of the site.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26659

Object

Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane**Respondent:** Historic England**Summary:**

Site includes Grade II Listed Everton School Westerfield House, and adjacent to/within the setting of other Grade II Listed buildings (Allens House, and Laceys Farmhouse). Development must preserve and where possible enhance these assets and their settings where this setting contributes to significance. Heritage Impact Assessment required, which must assess the contribution this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove/ mitigate any harm should be included in a site specific policy for ISPA4.1.

Change suggested by respondent:

Heritage Impact Assessment required and any mitigation required subsequently included in a site specific policy for this site.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26663

Object

Policy SP11 – The Waterfront**Respondent:** Historic England**Summary:**

Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.

Change suggested by respondent:

The opportunity areas need to be clearly defined and labelled on the IP-One policies map. request that you review the wording for these policies again; identifying which heritage assets (or their settings) would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. This wording should incorporate the design principles set out in Chapter 6 of the Plan, and should include/draw on/reference, where relevant the Archaeological Character Zone by Archaeological Character Zone recommendations set out in Appendix 3 of the Council's Development & Archaeology supplementary planning document (SPD) (November 2018), as well as the Council's Urban Character SPD.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26664

Object

Policy SP12 – Education Quarter**Respondent:** Historic England**Summary:**

Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.

Change suggested by respondent:

The opportunity areas need to be clearly defined and labelled on the IP-One policies map. request that you review the wording for these policies again; identifying which heritage assets (or their settings) would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. This wording should incorporate the design principles set out in Chapter 6 of the Plan, and should include/draw on/reference, where relevant the Archaeological Character Zone by Archaeological Character Zone recommendations set out in Appendix 3 of the Council's Development & Archaeology supplementary planning document (SPD) (November 2018), as well as the Council's Urban Character SPD.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26665

Object

Policy SP13 – Portman Quarter (formerly Ipswich Village)**Respondent:** Historic England**Summary:**

Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.

Change suggested by respondent:

The opportunity areas need to be clearly defined and labelled on the IP-One policies map. request that you review the wording for these policies again; identifying which heritage assets (or their settings) would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. This wording should incorporate the design principles set out in Chapter 6 of the Plan, and should include/draw on/reference, where relevant the Archaeological Character Zone by Archaeological Character Zone recommendations set out in Appendix 3 of the Council's Development & Archaeology supplementary planning document (SPD) (November 2018), as well as the Council's Urban Character SPD.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26639

Object

Policy SP17 – Town Centre Car Parking**Respondent:** Councillor Oliver Holmes**Summary:**

Town centre car parking generates car trips - significant contributor to carbon emissions within town centre. Availability of parking is a disincentive to modal shift and more sustainable travel options. To comply with national zero carbon objectives, Draft needs to acknowledge car parking is material in an overall assessment of carbon emissions and the overarching objective of reducing carbon emissions. Make reference to national policy and the Ipswich Climate Emergency.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26642

Object

Policy SP17 – Town Centre Car Parking**Respondent:** Councillor Oliver Holmes**Summary:**

Based on flawed 2019 Parking Strategy:

- Doesn't acknowledge contribution to carbon reduction that of reduced car trips into town
- Assumption for modal shift of 10% of trips by end of plan period without evidence
- No analysis of Princes Street car park spaces used by train commuters, providing little economic benefit
- Assumption that temporary car parks will disappear without evidence
- Temporary and long stay car parks should be differentiated
- No analysis of why park and ride schemes aren't viable
- Contribution towards air quality not quantified

Suspicion that fee income wins over policy. Until proper analysis, no multi-storey car parks site allocated.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26235

Support

Site Sheets, Site Ref: IP010b (Policy SP2 & SP9) Felixstowe Road**Respondent:** Mr Daniel Hudson**Summary:**

Support change of use from employment to residential, particularly for the portion of the site currently occupied by Ardent Hire Solutions. The various named businesses that have operated from that land have seen a big increase in business over the years and as such have contributed to a large increase in noise at all times of the day, and sometimes night. It is a wholly inappropriate location for such a business with the amount of foot traffic from both children heading to school and the more elderly heading to the doctors. Also damage to local roads from trailers.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26247**Object****Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane****Respondent:** Ipswich Rugby Football Club (Ipswich RFC)**Summary:**

Ipswich RFC serves the local rugby playing community and has a requirement for extra land to meet the demands for it. Land at Humber Doucy Lane adjacent to IP184b is currently leased to meet demand but more space needed. We do not wish to be omitted from any land allocation as the funds realised by land sale could greatly assist the club in better meeting demands. We are also seeking to expand our offering if larger replacement playing facilities adjacent to current pitches are made available or a new site identified. Site IP184b should be included within the ISPA4.1 allocation.

Change suggested by respondent:

Include site IP184b within the ISPA4.1 allocation.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26606**Object****Site Sheets, Site Ref: IP054b (Policy SP2) Land between Old Cattle Market & Star Lane****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP054b: Allocated in 1997 Local Plan as part of site refs: 5.9 and 5.10. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26597**Object****Site Sheets, Site Ref: IP009 (Policy SP2) Victoria Nurseries, Westerfield Road****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP009: Allocated in 1997 Local Plan as part of site ref: 6.8, despite which has remained undeveloped. Displacement of existing nursery use would be required. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26599****Object****Site Sheets, Site Ref: IP011c (Policy SP2) Smart Street/ Foundation Street (North)****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP011c: Allocated in 1997 Local Plan as part of site ref: 5.8, yet has not to date come forward for development. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26602**Object****Site Sheets, Site Ref: IP012 (Policy SP2) Peter's Ice Cream Grimwade Street****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP012: Allocated in 1997 Local Plan as part of site ref: 5.11. Whilst parts of wider site have come forward, and signs of potential development have been apparent, it is noted that the site does not yet benefit from planning permission. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26603****Object****Site Sheets, Site Ref: IP035 (Policy SP2) Key Street/ Star Lane/ Burtons (St Peter's Port)****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP035: Allocated in 1997 Local Plan as site ref: 5.6. Site lies between two busy roads as part of one way network, which may form constraint. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26605**Object****Site Sheets, Site Ref: IP037 (Policy SP2, SP6, SP15 & SP15) Island Site****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP037: Allocated in 1997 Local Plan under site refs: 5.1 and 5.2. The need for additional access arrangements is noted and may represent constraint. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26607****Object****Site Sheets, Site Ref: IP132 (Policy SP2) Former St Peter's Warehouse, 4 Bridge Street****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP132: Allocated in 1997 Local Plan as part of site ref: 5.3. Lengthy vacancy with no signs of coming forward, despite allocation since 1997. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26608**Object****Site Sheets, Site Ref: IP136 (Policy SP2) Silo, College Street****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP136: Allocated in 1997 Local Plan as part of site ref: 5.3. Fire damaged buildings and lengthy vacancy with no signs of coming forward, despite allocation since 1997. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:**26610****Object****Site Sheets, Site Ref: IP150d (Policy SP2) Land south of Ravenswood****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP150d: Allocated in 1997 Local Plan as part of site ref: 6.1. Remainder of Ravenswood community has been built out, but several parcels remain undeveloped. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26614**Object****Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Site IP150e: Allocated in 1997 Local Plan, as part of site ref 6.1. Remainder of Ravenswood community has been built out but several parcels remain undeveloped. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26635****Object****Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane****Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative allocation of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough. Land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the IGS development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

See accompanying letter for further details.

Change suggested by respondent:

Allocate land west of Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings) instead of Humber Doucy Lane (ISPA4.1).

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26191**Object****Policy SP9 - Safeguarding Land for Transport Infrastructure****Respondent:** JPL Properties LLP**Summary:**

Owner of Airport Farm Kennels (IP152) since 1999. While positive to see our land included in the latest Local Plan, we formally object to our land being considered for Park and Ride allocation.

Change suggested by respondent:

Remove park and ride from allocation.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26190**Object****Site Sheets, Site Ref: IP152 (Policy SP5 & SP9) Airport Farm Kennels, north of the A14****Respondent:** JPL Properties LLP**Summary:**

Owner of Airport Farm Kennels since 1999. While positive to see our land included in the latest Local Plan, we formally object to our land being considered for Park and Ride allocation.

Change suggested by respondent:

Remove park and ride from allocation.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26458

Object

Policy SP2 - Land Allocated for Housing**Respondent:** Kesgrave Covenant Ltd**Agent:** Kesgrave Covenant Ltd**Summary:**

Although support the inclusion of the allocation at Humber Doucy Lane within the Core Strategy document, it should also be included within the Site Allocations and Policies DPD. Omission is neither justified nor effective. Recommend additional line within Table 1 in relation to Humber Doucy Lane: Site ref: ISPA4.1

Site name and development description: Northern End of Humber Doucy Lane

Site size ha (% residential on mixed sites): 23.62ha

(c. 50%)

Indicative capacity (homes): 496

Capacity evidence: 35dph (DM23c)

Likely delivery timescale: M/L

For sake of completeness, Ipswich Garden Suburb should also be included. Recommend amendment to paragraph 4.7 wording.

Change suggested by respondent:

Paragraph 4.7 should be amended to reflect the proposed changes to table 1 with revised wording as follows:

"The indicative capacity of the sites in table 1 listed in the policy above is 6,514 dwellings. These will contribute to meeting the minimum housing requirement of 8,010 dwellings by 2036, as identified through Policy CS7 of the Final Draft Core Strategy. The Final Draft Core Strategy allocates land for the development of approximately 3,500 dwellings at Ipswich Garden Suburb (the Ipswich Northern Fringe) through policy CS10, with delivery expected to start in 2019 and end in 2036. The Core Strategy Review also identifies a cross-border allocation for development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, at the northern end of Humber Doucy Lane adjacent to Tuddenham Road, through policy ISPA4."

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26193

Object

Site Sheets, Site Ref: IP032 (Policy SP2 & SP6) King George V Field, Old Norwich Road**Respondent:** Trustees King George V Field**Summary:**

The use of this field for housing has been under discussion with developers and council staff as long as twenty years. It originally envisaged housing for the entire site rather than partially over the site which the current plan indicates. For the playing field to regenerate itself it will need to be sold for development and then a multi-sports field provided in Whitton separately. The Trust would have insufficient funds if development goes ahead as set out in the Local Plan. Don't object to principle but site cannot be vacated until alternative arrangements made.

Change suggested by respondent:

Amend site boundary to cover entirety of playing fields.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26163

Object

Site Sheets, Site Ref: IP307 (Policy SP2) Princes of Wales Drive**Respondent:** Mr Frank King**Summary:**

Totally unnecessary and poorly presented. Area is open and consists of bungalows and semi-detached properties. Car park within site is valuable and well used by new properties at Abedere Close, Elderly People's home and school nearby. High volumes of traffic including buses. Parking problems. Threat to highway safety. Loss of views to river. Ageing population in area and there is a need for shops. There are alternative plots at the side of ASDA, Maidenhall allotments and unused sports field at Bourne Vale which should be looked at instead. Overcrowding. Should be withdrawn.

Change suggested by respondent:

Remove allocation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26197

Object

Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood**Respondent:** Cindy Lawes**Summary:**

Object. A suburb this size should not have only one entrance and exit. The additional 126 houses will bring additional vehicles into the suburb, and this will exacerbate problems. We have to manage through the Henning Road roundabout, which is frequently blocked by people trying to get into the MacDonalds and then out the suburb onto a major roundabout. The Orwell Bridge closures worsen this. Another access road off the A1189 will not alleviate any of the problems. The doctor's practice is already stretched and this was worsened by the closure of Landseer Surgery. Inadequate health facilities for new residents.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26258

Object

Site Sheets, Site Ref: IP354 (Policy SP2) 72 (Old Boatyard) Cullingham Road**Respondent:** Mr Tim Leggett**Summary:**

Cullingham Road is a quiet, friendly cul-de-sac which may be diluted with bigger population. Area flooded badly in 1953 and there is increased risk of flooding. Is this the best place for new housing? Concerns about piling and damage compensation. Great crested newts on-site, protected by European Law. Road is poorly maintained by Councils, sewer pipes are insufficient and a "please keep clear" sign needed on Handford Road. Concern about increase in traffic and large vehicles during construction. Insufficient parking. Need a play area and large gardens. Will this be a housing association? If so contrary to owner occupation presence.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26165**Object****Site Sheets, Site Ref: IP307 (Policy SP2) Princes of Wales Drive****Respondent:** Lisa Magor**Summary:**

As a resident of Prince of Wales Drive, I will be strongly opposing the current development by Orwell housing (yet to be submitted).

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26270**Object****Site Sheets, Site Ref: IP098 (Policy SP2) Transco south of Patteson Road****Respondent:** Lily Maksimovic**Summary:**

Concerned that you might be building a new block of Apartments near where I live. This area is already well built up and we struggle with parking as every household has 2 or more car's. We are all concerned as how this will impact on us living here.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26271

Object

Appendix 4 - Opportunity Areas, Site Ref: IP226 (Policy SP4) Helena Road/ Patteson Road**Respondent:** Lily Maksimovic**Summary:**

Concerned that you might be building a new block of Apartments near where I live. This area is already well built up and we struggle with parking as every household has 2 or more car's. We are all concerned as how this will impact on us living here.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26269

Object

Opportunity Area H - Holywells Area**Respondent:** Lily Maksimovic**Summary:**

Concerned that you might be building a new block of Apartments near where I live. This area is already well built up and we struggle with parking as every household has 2 or more car's. We are all concerned as how this will impact on us living here.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26168**Object****Site Sheets, Site Ref: IP061 (Policy SP2 & SP6) Former School Site, Lavenham Road****Respondent:** Mr Stewart McCarthy**Petition:** 2 petitioners**Summary:**

Infilling the green space would and has ruined the local character. The historic value/ setting of the Grade 2 Listed Crane Manor should be preserved. Poor design. Green space is used for recreation and dog-walking. Loss of view. Green spaces play important role in an urban 'ecosystem' (e.g. physical activity, relaxation, social interaction and community events). WHO states physical activity in a natural environment can alleviate mental health and well being issues. Noise pollution, overlooking, overshadowing, odour, loss of light, light pollution and dust/ vibration impacts. Will cause traffic generation and parking issues. Inadequate local infrastructure. Anti-social behaviour from development.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26203****Object****Policy SP15 – Improving Pedestrian and Cycle Routes****Respondent:** Mrs Andrea McDonald**Summary:**

No coherent walking or cycling route. Especially problematic is the area around the roundabout near St Peters Church. A route from the waterfront/ river towpath is divided by the gyratory. River towpath too narrow to cycle on and surface keeps deteriorating. Is there any plan improving the towpath? More usage would make people confident using it. River path needs to be connected with the waterfront. Currently driving is still allowed there (area around the university and various cafes/ restaurants). Passing traffic also poses danger to children.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26234

Object

Site Sheets, Site Ref: IP354 (Policy SP2) 72 (Old Boatyard) Cullingham Road**Respondent:** Mr Stephen Morgan**Summary:**

Object strongly to the development of this land for housing. This would have an impact on an already busy road as well as having a detrimental effect on the wildlife around the river bank. Our property would also be overlooked by the development resulting in a loss of privacy. Noise pollution from the said development would also have an impact. Cullingham Road already has issues with parking and this development would make this situation even worse. Access to the site for heavy machinery would be impossible as the road is not wide enough.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26192

Object

Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood**Respondent:** Mr Jonathan N/A**Summary:**

Generally supportive of a mixed tenure development on this site in line with recent SOS verdict. However, cannot support development until IBC takes significant measures to improve the flow of traffic in the area. The roundabouts at the entrance to Ravenswood are a significant bottle neck, causing dangerous congestion due to illegal manoeuvres. Traffic is regularly problematic at rush hour, but also at other hours due to the popularity of McDonald's. Solutions might include additional entrances to the residential areas (with measures to prevent use as a cut through), additional entrances to Ravenswood retail park, additional lanes between roundabouts.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26515

Object

Policy SP17 – Town Centre Car Parking**Respondent:** Northern Fringe Protection Group**Summary:**

We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane. It is not clear if the Ipswich Parking Strategy has actually been approved by the IBC Executive. The parking strategy is based on substantially higher jobs (12,500) and housing (8,840) targets than set out in the CS. Therefore obsolete. Parking strategy needs to take account of Climate Emergency declaration.

Change suggested by respondent:

Town centre parking land should be used for housing instead of countryside. Parking strategy needs to take account of climate emergency declaration.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26194

Object

Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane**Respondent:** Derk Noske**Summary:**

This site should remain as farmland to provide the Green Trail route outlined in the planning policy DM10 of the Ipswich Local Plan. Any additional housing would encroach on this pristine countryside that today provides easy access to green spaces as set out in the local plan

Change suggested by respondent:

No housing to be developed on these sites

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

26245

Support

Site Sheets, Site Ref: IP011b (Policy SP2) Smart Street/ Foundation Street (South)**Respondent:** Ortona Properties Ltd**Summary:**

The landowner (Ortona Properties Ltd) supports the allocation for the residential use of the site. The current use of the site remains as a bus depot under a lease agreement, but could come forward for development between the middle to end of the plan period. The site provides important linkage for the redevelopment of Merchants Quarter and would provide improved frontage along Star Lane, which in turn would provide visual enhancement to the Central and Wet Dock Conservation Areas.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26241

Object

Site Sheets, Site Ref: IP054b (Policy SP2) Land between Old Cattle Market & Star Lane**Respondent:** Ortona Properties Ltd**Summary:**

Bus station is included within Opportunity Area B, however IP054b should be extended north to include the bus station. The future redevelopment of part/ all of the site could enhance connectivity by providing a pedestrian-friendly mixed-use area to link Turret Lane to Dogs Head Lane and the Buttermarket. The land (in red) is under lease as a bus station, however given wider regeneration aims for this area, IP054b should be extended north to cover the opportunity area. This would ensure that the plan remains flexible over the plan period, particularly towards the end and ensure plan soundness.

Change suggested by respondent:

Extend IP054B northwards to cover the Opportunity Area B/ Cattlemarket Bus Station (Merchants Quarter).

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26242

Object

Opportunity Area B – Merchant Quarter**Respondent:** Ortona Properties Ltd**Summary:**

Bus station is included within Opportunity Area B, however IP054b should be extended north to include the bus station. The future redevelopment of part/ all of the site could enhance connectivity by providing a pedestrian-friendly mixed-use area to link Turret Lane to Dogs Head Lane and the Buttermarket. The land (in red) is under lease as a bus station, however given wider regeneration aims for this area, IP054b should be extended north to cover the opportunity area. This would ensure that the plan remains flexible over the plan period, particularly towards the end and ensure plan soundness.

Change suggested by respondent:

Amend Site Allocation IP054b to cover the bus station in the Opportunity Area.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26273

Object

Site Sheets, Site Ref: IP354 (Policy SP2) 72 (Old Boatyard) Cullingham Road**Respondent:** Margaret Pearson**Summary:**

Object strongly to the allocation. Would have an impact on the already busy road as well as having detrimental effect on the wildlife around the river bank. (Crested Newts). Overlooking by the development resulting in loss of privacy. Noise pollution from the said development would also have an impact. Cullingham Road has already issues with parking and this development would make this situation even worse. Access to the site for heavy machinery would be impossible as the road is not wide enough. Also the drainage and sewage from this new site will have significant overload on the already overcrowded road.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26449

Object

Policy SP2 - Land Allocated for Housing**Respondent:** Pigeon Investment Management Ltd**Summary:**

Therefore, Pigeon consider that the majority of the sites that the Council has proposed for residential allocation are subject to significant constraints that could delay, or indeed, ultimately prevent their delivery. Whilst many of the sites highlighted may be of a small to medium scale, it is considered that when combined, their implications on housing delivery could be significant. In any case, these provide only a snapshot of the constraints that are likely to impact upon many of the sites that are proposed for allocation.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26432

Object

Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane**Respondent:** Jo Porter**Summary:**

Development of IPS4.1 would; create urban effect in rural area; destroy habitats, trees, hedges, crops; destroy designated green spaces and green rim; attracts endangered wildlife and variety of animals; create air pollution; traffic infrastructure is not capable, including Tuddenham Road and Humber Doucy Lane; local high school and primary school at capacity; no safe walking/cycling route; wastewater issues, including lack of sewage infrastructure; drainage (at capacity); economy issues; extra noise; loss of natural light; and 600 houses is too many.

Change suggested by respondent:

IF, this plan is agreed then there MUST be consideration for drainage, safety with regards to traffic overload, cycle lanes and dual school catchment areas with a reduced amount of proposed dwellings - over 600 houses is too high and this will inevitably destroy the countryside which it will border.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26334

Object

Policy SP3 - Land with Planning Permission or Awaiting a Section 106, IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)**Respondent:** Ravenswood Environmental Group**Summary:**

The Online consultation refers to this as being sites Sand T but these were built out prior to April 2019, The correct reference should be sites U, V, W. It is questioned whether these can be stated as having planning permission as they relate to an historic Outline Planning Permission which is no longer extant.

Change suggested by respondent:

The plan should contain a policy which explains what is proposed for sites U, V, W given that the sites no longer have planning consent and it would be unreasonable to rely on an old planning permission to guide what would be proposed. The site has been removed from the plan without justification.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

26336

Object

Policy SP5 – Land Allocated for Employment Use**Respondent:** Ravenswood Environmental Group**Summary:**

The Ravenswood employment sites should be planned so as to mitigate traffic impacts and be masterplanned with residential development

Change suggested by respondent:

The whole area should be masterplanned so that environmental impacts are considered.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

26339

Object

Policy SP5 – Land Allocated for Employment Use**Respondent:** Ravenswood Environmental Group**Summary:**

The plan is proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon

Change suggested by respondent:

Rewrite the plan to provide a criteria based policy which only proposes development upon evidence that the impacts can be mitigated on a comprehensive basis

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

26335

Object

Policy SP7 – Land Allocated for Leisure Uses or Community Facilities**Respondent:** Ravenswood Environmental Group**Summary:**

The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated

Change suggested by respondent:

Delete the proposed sports park from the plan Site IP150b

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

26636

Object

Site Sheets, Site Ref: IP150b (Policy SP7) Land south of Ravenswood

Respondent: Ravenswood Environmental Group

Summary:

The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated.

Change suggested by respondent:

Delete sports park.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

26332

Object

Policy SP2 - Land Allocated for Housing

Respondent: Ravenswood Environmental Group

Summary:

Not justified

Change suggested by respondent:

Plan needs to be rewritten to justify sites with criteria based policies which deal with the mitigation of development impacts.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

26630

Object

Site Sheets, Site Ref: IP150c (Policy SP5) Land south of Ravenswood**Respondent:** Ravenswood Environmental Group**Summary:**

The plan is proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon

Change suggested by respondent:

Not specified

Legally No

compliant:

Sound: No

Comply with No

duty:

Attachments: None

26338

Object

Site Sheets, Site Ref: IP150d (Policy SP2) Land south of Ravenswood**Respondent:** Ravenswood Environmental Group**Summary:**

Site IP150d is proposed for 34 homes but its contrived and unjustified shape demonstrates that it cannot accommodate 34 homes as frontage development. The site is of considerable ecological value and is used as Public Open Space. If it is to be developed then it should be masterplanned with other sites as part of one mixed use criteria based policy

Change suggested by respondent:

Delete site 150d

Legally No

compliant:

Sound: No

Comply with No

duty:

Attachments: None

26632

Object

Site Sheets, Site Ref: IP152 (Policy SP5 & SP9) Airport Farm Kennels, north of the A14**Respondent:** Ravenswood Environmental Group**Summary:**

The plan is proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon

Change suggested by respondent:

Not specified

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

26331

Object

Chapter 1 - Introduction**Respondent:** Ravenswood Environmental Group**Summary:**

The plan is poorly prepared and presented and is very difficult to read. It lacks justification and its policies are neither useful to developers or decisionmakers. It is the most poorly presented plan in the region. It needs to demonstrate cross boundary working as happens in Greater Norwich and Greater Cambridge and it needs criteria based policies so that it can be held to account by the public and used successfully by developers. It is vague and the environmental impacts are not justified.

Change suggested by respondent:

The plan needs to be rewritten following a proper cooperation with the public and neighbouring Councils.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

26333

Object

Chapter 1 - Introduction

Respondent: Ravenswood Environmental Group

Summary:

The plan has not been positively prepared and is poorly presented in an illogical way. There is no cooperation between local authorities such as has happened around Cambridge or Norwich. The plan contains disjointed lists of sites and does nothing to assist decision makers to establish what is or is not acceptable or how various constraints would be overcome.

Change suggested by respondent:

Rewrite the plan. Cooperate properly with the public and cross border authorities.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26337

Object

Policy SP2 - Land Allocated for Housing

Respondent: Ravenswood Environmental Group

Summary:

The Policy is supported by site sheets in an appendix. The appendix should make it clear that the site sheets are or are not part of the plan. The plan is vague and unjustified. Site IP150 e is adjacent to other sites such as IP150c and IP150e and IP150d. These are geographically related but they are separate in the plan. There is no justification for this piecemeal approach. The plan highlights serious traffic, air-quality, ecology, amenity and heritage constraints but does nothing to resolve these and does not insist upon masterplanning and effective mitigation.

Change suggested by respondent:

Propose a new policy to present all of the plans for Ravenswood so that the various sites can be effectively masterplanned and environmental mitigation proposed. It is unacceptable to propose development only with a list of issues whilst not inviting or suggesting how these would be resolved.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

26173

Object

Policy SP3 - Land with Planning Permission or Awaiting a Section 106, IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)

Respondent: Ravenswood Residents Association

Summary:

IP150a, IP150d and IP150e equate to 254 houses. Should fully reflect 65.8% private housing and 34.2% social housing mix. Recommend additional new access to Ravenswood to cope with anticipated surge in traffic volumes. Already heavy congestion at access point during; morning/ evening peaks, school drop-off/ pick-up, and, lunch times, which prevents emergency vehicles access. Does "Highway Network" just refer to the Nacton Road/ Thrasher Roundabout or ALL local roads? Second access road should relieve pressure for whole of Ravenswood, not just new sites. Upgrading private road to south of Ravenswood needed as second access. Has additional pupil demand been considered?

Change suggested by respondent:

A new second access road should be included and should serve the whole of Ravenswood, not just any new sites.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26176

Object

Site Sheets, Site Ref: IP150b (Policy SP7) Land south of Ravenswood

Respondent: Ravenswood Residents Association

Summary:

Access to this Sports Park site will also need to be specified, as presumably access from Alnesbourne Crescent would need to be made, it would appear, through the proposed new housing development on IP150d.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26174

Object

Site Sheets, Site Ref: IP150c (Policy SP5) Land south of Ravenswood**Respondent:** Ravenswood Residents Association**Summary:**

Is the access to this B1 site for offices etc. to be via the new IP150e 126 housing development? This would need to be masterplanned. Recommend additional new access to Ravenswood is masterplanned with sites IP150e and IP152 to cope with anticipated surge in traffic volumes. Already heavy congestion at access point during; morning/ evening peaks, school drop-off/ pick-up, and, lunch times, which prevents emergency vehicles access.

Change suggested by respondent:

Recommend additional new access to Ravenswood is masterplanned with sites IP150e and IP152 to cope with anticipated surge in traffic volumes.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26172

Object

Site Sheets, Site Ref: IP150d (Policy SP2) Land south of Ravenswood**Respondent:** Ravenswood Residents Association**Summary:**

IP150a, IP150d and IP150e equate to 254 houses. Should fully reflect 65.8% private housing and 34.2% social housing mix. Recommend additional new access to Ravenswood to cope with anticipated surge in traffic volumes. Already heavy congestion at access point during; morning/ evening peaks, school drop-off/ pick-up, and, lunch times, which prevents emergency vehicles access. Does "Highway Network" just refer to the Nacton Road/ Thrasher Roundabout or ALL local roads? Second access road should relieve pressure for whole of Ravenswood, not just new sites. Upgrading private road to south of Ravenswood needed as second access. Has additional pupil demand been considered?

Change suggested by respondent:

A new second access road should be included and should serve the whole of Ravenswood, not just any new sites. Consider pupil demand.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26171

Object

Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood**Respondent:** Ravenswood Residents Association**Summary:**

IP150a, IP150d and IP150e equate to 254 houses. Should fully reflect 65.8% private housing and 34.2% social housing mix. Recommend additional new access to Ravenswood to cope with anticipated surge in traffic volumes. Already heavy congestion at access point during; morning/ evening peaks, school drop-off/ pick-up, and, lunch times, which prevents emergency vehicles access. Does "Highway Network" just refer to the Nacton Road/ Thrasher Roundabout or ALL local roads? Second access road should relieve pressure for whole of Ravenswood, not just new sites. Upgrading private road to south of Ravenswood needed as second access. Has additional pupil demand been considered?

Change suggested by respondent:

A new second access road should be included and should serve the whole of Ravenswood, not just any new sites. Consider pupil demand.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26175

Object

Site Sheets, Site Ref: IP152 (Policy SP5 & SP9) Airport Farm Kennels, north of the A14**Respondent:** Ravenswood Residents Association**Summary:**

This development currently poses access constraints which would also need to be master planned comprehensively with the aforementioned IP150e and IP150c sites. Recommend additional new access to Ravenswood to cope with anticipated surge in traffic volumes. Already heavy congestion at access point during; morning/ evening peaks, school drop-off/ pick-up, and, lunch times, which prevents emergency vehicles access.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26184

Object

Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood**Respondent:** Mrs Jacky Robson**Summary:**

Main concern is that this, in conjunction with the proposal to build houses next to the primary school in Downham Boulevard, will put intolerable pressure on the vehicular access in and out of Ravenswood. This is aggravated by the amount of queuing traffic generated by Macdonalds restaurant, situated near the only entrance/exit. Apart from the traffic problems, Ravenswood seems to have been well-designed with good cycle paths, bus routes etc. I do hope that you will re-consider this decision, and look carefully at the idea of incorporating another entrance/exit to Ravenswood.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26232

Object

Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane**Respondent:** Rushmere St Andrew Parish Council**Summary:**

Rushmere St Andrew Parish Council objects to the inclusion of land at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. This allocation will significantly increase traffic on the Woodbridge to Claydon corridor via Playford Road, Rushmere Street and Humber Doucy Lane. This development should not take place until significant improvements to roads and travel has been made.

Change suggested by respondent:

Delete the policy

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

26181

Object

Policy SP2 - Land Allocated for Housing**Respondent:** Salter and Skinner Partnership**Agent:** Planning Direct**Summary:**

Flooding assessments and extensive consultation undertaken with Environment Agency and emergency services. Feedback positive and carried to EA requirements. No fundamental objections. Concerns of consultees can be met. Site partly within flood zone 1, development can be made safe for its lifetime, refuges can be available on-site, flood evacuation routes can be facilitated to Bourne Park and compensatory storage designed in. Whilst approach routes could be inundated this hasn't been raised as a fundamental objection by AECOM or Fire Service. As occupants would be safe then considerable weight should be given to the tilted balance in favour of development (NPPF).

Change suggested by respondent:

Site IP034 should be included as an allocation under Policy SP2 of the Site Allocations DPD of the emerging Local Plan.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26395

Object

Policy SP17 – Town Centre Car Parking**Respondent:** Save Our Country Spaces**Summary:**

We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane. It is not clear if the Ipswich Parking Strategy has actually been approved by the IBC Executive. The parking strategy is based on substantially higher jobs (12,500) and housing (8,840) targets than set out in the CS. Therefore obsolete. Parking strategy needs to take account of Climate Emergency declaration.

Change suggested by respondent:

Town centre parking land should be used for housing instead of countryside. Parking strategy needs to take account of climate emergency declaration.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26169**Object****Site Sheets, Site Ref: IP061 (Policy SP2 & SP6) Former School Site, Lavenham Road****Respondent:** Miss Claire Sawyer**Summary:**

Green is used by local people to enjoy and this will destroy the final part of an already spoilt open space. Ipswich Borough Council gave permission/ sold off a large chunk of the green which has been destroyed by Suffolk County Council to build a Respite Home which is going to be a rehabilitation centre for unknown types of people. Residents weren't consulted on the application and would have objected. Further disruption from building works and activity. Blocking of private drives. Loss of privacy. Loss of outlook. Lower value of our property. No service road/ assistance offered from Councils.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:**26182****Object****Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood****Respondent:** Hilary Scott**Summary:**

There is already insufficient car parking as people park illegally throughout Ravenswood. Traffic congestion in Ravenswood is a nightmare. The addition of 126 homes will only worsen this. More homes should be built in central Ipswich rather than on the green land in the outskirts which is bad for wildlife, climate change and traffic pollution/ congestion. A park or a lake should be pursued instead to enhance the area and encourage more wildlife. We need more green spaces, trees and areas of natural beauty no more homes in already overpopulated developments.

Change suggested by respondent:

It should be used as green space with a park or lake instead.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

26187

Object

Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood**Respondent:** Dr Bashar Shatta**Summary:**

Strongly object. Access is a major problem for all Ravenswood residents as well as parking. New roads in and out of Ravenswood are needed and more parking spaces should be provided before any other houses are built.

Change suggested by respondent:

Not specified

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26651

Support

Chapter 2 - The Ipswich Local Plan**Respondent:** Silverton Aggregates Ltd**Summary:**

We support the location of the IP-One Boundary as illustrated in Figure 1. We also agree with the identification of strategic issues to be addressed, including allocating sufficient land to meet objectively assessed housing need in accordance with the National Planning Policy Framework.

Change suggested by respondent:

N/A

Legally Not specified

compliant:

Sound: Yes

Comply with Not specified

duty:

Attachments:

26652

Object

Policy SP2 - Land Allocated for Housing**Respondent:** Silverton Aggregates Ltd**Summary:**

We support the allocation of sites for residential development. However, it is our view that our client's site should be considered for residential development in the IP-One Area. The site is adjacent to proposed allocation IP031a, and would make a logical extension to this. It is therefore considered that, at this stage, the emerging Local Plan does not meet the tests of soundness in terms of ensuring the consistent delivery of housing in accordance with National Planning Policy. Please see pages 9 -12 and appendices 1 and 2 of the full representation for further information regarding the potential development.

Change suggested by respondent:

The Site should be included as a site allocation for residential development.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26653

Object

Policy SP11 – The Waterfront**Respondent:** Silverton Aggregates Ltd**Summary:**

The Waterfront area should be extended westwards to encompass the site to the north of Burrell Road, which provides an opportunity for regeneration of the site to a residential use. This would comply with Paragraph 5.22 which states that Policy CS2 focuses on residential and community facility development within the Waterfront in order to support the regeneration and sustainable growth of Ipswich, and mixed use development within the town centre. Consequently, this would incorporate the site to the north of Burrell Road, which is a suitable, available and deliverable site, capable of accommodating residential development to meet unmet need.

Change suggested by respondent:

Extend the Waterfront area boundary westwards to cover the land North of Burrell Road. Allocate the Site for residential development.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26283

Object

Site Sheets, Site Ref: IP032 (Policy SP2 & SP6) King George V Field, Old Norwich Road**Respondent:** Sport England**Summary:**

Sport England raises no objection to this allocation, but we feel the text in relation to the requirements for a replacement facility should be more explicit and should reflect Sport England's policy in relation to replacement playing fields (see proposed change). Including the recommended text within the policy or supporting text would make Sport England support at application stage more likely.

Change suggested by respondent:

"The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements."

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26595

Object

Site Sheets, Site Ref: IP010a (Policy SP2, SP7 & SP9) Co-Op Depot Felixstowe Road**Respondent:** Suffolk County Council**Summary:**

Site Sheet for Site IP010a - This part of the plan is not sound because it is not effective. The County Council welcome that the need to expand the school has been recognised within the plan, however feasibility work which has been undertaken since the preferred options consultation of the plan show that the area of land needed to expand the school is 0.8ha.

Change suggested by respondent:

The area of land needed to expand the school is 0.8ha.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26618**Object****Site Sheets, Site Ref: IP089 (Policy SP2) Waterworks Street****Respondent:** Suffolk County Council**Summary:**

Correction needed to site sheet: 'This site is a large area (delete: in) (insert: on the edge of the) Anglo-Saxon and Medieval core and within the Area of Archaeological Importance (IPS 413).'

Change suggested by respondent:

Correction needed to site sheet: 'This site is a large area (delete: in) (insert: on the edge of the) Anglo-Saxon and Medieval core and within the Area of Archaeological Importance (IPS 413).'

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:**26609****Object****Site Sheets, Site Ref: IP011c (Policy SP2) Smart Street/ Foundation Street (North)****Respondent:** Suffolk County Council**Summary:**

Amend for clarity: 'The site lies... close to the grade II* St Mary at Quay Church, (delete: contains two scheduled monuments) and lies within an area of archaeological importance.' Also amend: 'There is also limited potential for nationally important archaeological remains outside of the (insert: scheduled and previously scheduled) areas. (Delete: This is because much of the site has already been excavated in the past. Detailed early) Pre-application discussion with Suffolk County Council Archaeological Service (add: is advised.) (Delete: and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design.)'

Change suggested by respondent:

Amend for clarity: 'The site lies... close to the grade II* St Mary at Quay Church, (delete: contains two scheduled monuments) and lies within an area of archaeological importance.' Also amend: 'There is also limited potential for nationally important archaeological remains outside of the (insert: scheduled and previously scheduled) areas. (Delete: This is because much of the site has already been excavated in the past. Detailed early) Pre-application discussion with Suffolk County Council Archaeological Service (add: is advised.) (Delete: and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design.)'

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26598**Object****Site Sheets, Site Ref: IP048a (Policy SP2, SP6 & SP17) Mint Quarter/ Cox Lane East Reperation Area****Respondent:** Suffolk County Council**Summary:**

Site Sheet for Site IP048a - This part of the plan is not sound because it is not effective. Included among the uses of this site should be an early years setting to accompany the new primary school. The 60 place early years setting, which is necessary on this site to mitigate impacts of plan growth, is accounted for in Table 8a of the Core Strategy document. However, this should also be included on the site sheet in order to provide certainty in delivering an early years setting on this site.

Change suggested by respondent:

The 60 place early years setting, which is necessary on this site to mitigate impacts of plan growth, is accounted for in Table 8a of the Core Strategy document. However, this should also be included on the site sheet in order to provide certainty in delivering an early years setting on this site.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26612**Object****Site Sheets, Site Ref: IP354 (Policy SP2) 72 (Old Boatyard) Cullingham Road****Respondent:** Suffolk County Council**Summary:**

IP354, the following information could be added:

'The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.'

Change suggested by respondent:

IP354, the following information could be added:

'The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.'

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26615**Object****Site Sheets, Site Ref: IP355 (Policy SP2) Cullingham Road****Respondent:** Suffolk County Council**Summary:**

IP355 site sheet - the following information could be added: 'The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.'

Change suggested by respondent:

IP355, the following information could be added:

'The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.'

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26616**Object****Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane****Respondent:** Suffolk County Council**Summary:**

Site sheet for ISPA 4.1, the following information could be added: 'These large greenfield areas have not been previously systematically investigated for archaeological remains. Archaeological evaluation should be undertaken to inform planning applications, comprising a combination of desk-based assessment, geophysical survey and an appropriate level of trial trenched archaeological evaluation (see character zone 2c in Archaeology and Development SPD).'

Change suggested by respondent:

Site sheet for ISPA 4.1, the following information could be added: 'These large greenfield areas have not been previously systematically investigated for archaeological remains. Archaeological evaluation should be undertaken to inform planning applications, comprising a combination of desk-based assessment, geophysical survey and an appropriate level of trial trenched archaeological evaluation (see character zone 2c in Archaeology and Development SPD).'

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26604

Object

Appendix 4 - Opportunity Areas, Site Ref: IP028b (Policy SP4) Jewsons, Greyfriars Road**Respondent:** Suffolk County Council**Summary:**

The text refers to Archaeological Character Zone 2, but the site lies within Archaeological Character Zone 1b, for the Historic Core, and is therefore of a higher sensitivity than indicated on the site sheet. This text should be corrected to ensure that heritage assets are appropriately identified and approached by development. New text is proposed at the start of the paragraph after the heading 'Development Constraints' and existing text should be amended as follows: delete sentence 'This site likely lies in ...' and sentence 'Stratigraphy may be expected to be particularly deep' in their entirety.

Change suggested by respondent:

Add after Development Constraints heading: "The site lies on the edge of the River Gipping, within the likely former extent of the precinct of the medieval Franciscan friary (Greyfriars). There is potential for archaeological remains relating to the friary to survive on the site, as well as earlier occupation on the edge of lower lying marshy land. Within the western part of the site, marsh deposits have been identified, but human remains were recorded during construction of the eastern side of the existing buildings on the site. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work)." Also delete 'This site likely lies in the former extent of the town marsh' and 'Stratigraphy may be expected to be particularly deep in former streams and watercourses and waterlogged features are recorded in the Urban Archaeological Database.'

Legally Not specified**compliant:**

Sound: No

Comply with Not specified**duty:****Attachments:**

26600

Object

Policy SP2 - Land Allocated for Housing**Respondent:** Suffolk County Council**Summary:**

Table 1 of the Site Allocations Policies document - this part of the plan is not sound because it is not effective. The entry for site IP048a and IP037 on this table should include an early years setting, to provide certainty in delivering an early years setting on this site, in order to mitigate the impacts of growth on the provision of early education.

Change suggested by respondent:

The entry for site IP048a and IP037 on this table should include an early years setting, to provide certainty in delivering an early years setting on this site, in order to mitigate the impacts of growth on the provision of early education.

Legally Not specified**compliant:**

Sound: No

Comply with Not specified**duty:****Attachments:**

26640**Object****Policy SP17 – Town Centre Car Parking****Respondent:** Suffolk County Council**Summary:**

IBC's 2019 WYG parking report assumes a lower rate of traffic growth than that forecast by the Local Plan modelling, even accounting for modal shift. Greater clarity is needed on how the spatial strategy responds to the WYG finding that care is needed to ensure that the proposed level of parking does not inadvertently encourage car use. The "like for like" replacement approach at sites IP051 and IP015 needs clarification to avoid undermining restraint on long-stay provision. Policy needs to shorten any period of additional provision between a multi-storey being opened and a site redeveloped, to support sustainable travel efforts.

Change suggested by respondent:

Clarify how the spatial strategy responds to the WYG finding that care is needed to ensure that the proposed level of parking does not inadvertently encourage car use. Clarify the "like for like" replacement approach at sites IP051 and IP015, to avoid undermining restraint on long-stay provision. Include in policy a mechanism to shorten any period of additional provision between a multi-storey being opened and a site redeveloped.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26465****Object****Site Sheets, Site Ref: IP150b (Policy SP7) Land south of Ravenswood****Respondent:** Claire Talbot**Summary:**

In response to consultation of Ravenswood re: housing and skate park plans. The split between private and social housing needs to be in line with the rest of the estate. We do not want a repeat of the UVW situation where the land was earmarked 100% social. Traffic issues need to be considered, traffic already backs up daily at the McDonald's roundabout before additional housing. So would there be another entrance/exit? Concerns over disruption to and loss of wildlife. Instead of a skate park, an extension of the country park would give a space for recreation as well as maintaining wildlife.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26239

Support

Policy SP15 – Improving Pedestrian and Cycle Routes**Respondent:** Theatres Trust**Summary:**

We are supportive of this policy and consider it to meet the tests of soundness.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26237

Support

Opportunity Area C – Mint Quarter and surrounding area**Respondent:** Theatres Trust**Summary:**

As articulated at the previous stage we are supportive of these plans and of enhanced linkages to the Regent Theatre. We consider this to meet the tests of soundness.

Change suggested by respondent:

N/A

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26238

Object

Opportunity Area E – Westgate**Respondent:** Theatres Trust**Summary:**

We are also supportive of development at this site, although as set out previously we would encourage the principles to include engagement with the Trust given the potential for impact on New Wolsey Theatre. We otherwise consider this to meet the tests of soundness.

Change suggested by respondent:

Include "engagement with the Theatre Trust" as a principle.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

26325

Object

Site Sheets, Site Ref: IP355 (Policy SP2) Cullingham Road**Respondent:** Universal Property Services Ltd**Summary:**

Support allocation.

- 1) Positive re-use of a brownfield site, within a predominantly residential area.
- 2) The site will allow for a comprehensive and controlled re-development of the area including geographically linked sites IP279a, b(1) and b(2) – Former British Telecom Office, Bibb Way and IP003 Waste Tip at Sir Alf Ramsey Way all within close proximity to IP355.
- 3) The site will allow for cycle path aspirations linking the site to Bibb Way.
- 4) 10m EA River corridor buffer zone will remove 50% of the site & render the site nonviable.
- 5) Higher density will need to be considered to ensure viability and linked aspirations.

Change suggested by respondent:

10m EA River corridor buffer zone will remove 50% of the site & render the site nonviable. Higher density will need to be considered to ensure viability and linked aspirations.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

26180**Object****Site Sheets, Site Ref: IP150d (Policy SP2) Land south of Ravenswood****Respondent:** Ms Sally Wainman**Summary:**

Concerned about the change to the Local Plan in Ravenswood off Alnesbourne Crescent. New residents will put pressure on the sources of the local GP surgery.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:****26179****Object****Site Sheets, Site Ref: IP150e (Policy SP2) Land south of Ravenswood****Respondent:** Ms Sally Wainman**Summary:**

Concerned about the change to the Local Plan in Ravenswood off Alnesbourne Crescent. New residents will put pressure on the sources of the local GP surgery.

Change suggested by respondent:

Not specified

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26164**Object****Site Sheets, Site Ref: IP150d (Policy SP2) Land south of Ravenswood****Respondent:** Chris Warhurst**Summary:**

Skylarks have been seen nesting on this area. Bee orchids have been seen flowering in this area - which is protected under Section 13 of the Wildlife and Countryside Act (1981). These are 2 rare and protected species. The traffic connection at the main roundabout, the only access to/ from the Ravenswood estate, is beyond breaking point. Over 30 minute traffic jams in and out of estate particularly during school drop off/ collections, retail/ restaurant deliveries and times of high demand, peak commuter times and when roundabout congested. Local amenities (doctors, dentists and schools), sewage and drainage are at capacity.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:**26199****Object****Site Sheets, Site Ref: IP354 (Policy SP2) 72 (Old Boatyard) Cullingham Road****Respondent:** Mr & Mrs Christopher and Carole Williamson**Petition:** 2 petitioners**Summary:**

Traffic concerns. Existing parking pressures and access concerns on Cullingham Road due to lack of existing off road parking, new housing would add additional parking problems as new residents likely to have two vehicles. Highways safety concerns. Namely issues exiting onto Hanford Road, due to loss of road markings, construction traffic access concerns due to narrow entrance. Traffic pollution problems from construction vehicles. Wildlife disruption. Concern over loss of wildlife habitat, need to be encouraging wildlife. Health and well-being concerns. The change of use would cause noise and disruption at evenings and weekends in a quiet location.

Change suggested by respondent:

Not specified

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

Policies Maps Final Draft

Record count: 5

26492**Object****Supporting Documents, Ipswich Local Plan Policies Map (IP-One Area Inset) Final Draft****Respondent:** Associated British Ports**Agent:** Associated British Ports**Summary:**

Objection to inclusion on the IP – One Inset Map of a route for the Wet Dock Crossing. Whilst supportive of IBC's intention to continue to make a case for highway improvements including Wet Dock Crossing, given there is no formal commitment to this it is not appropriate for Policies Map IP – One Area Inset to define an alignment of a potential route for a Wet Dock Crossing and for SP9 to effectively safeguard this. Whilst this may not be the intention of the wording, it can be interpreted this way - request appropriate amendments.

Change suggested by respondent:

Request amendment of wording of the Policy and Inset Map with reference to Wet Dock Crossing.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26243**Object****Supporting Documents, Ipswich Local Plan Policies Map Final Draft****Respondent:** GeoSuffolk**Summary:**

The key is out of date. County Geological Sites and Regionally Important Geological Sites are all called "County Geological Sites" now. The five locations of the sites are correct, only the key is wrong.

Change suggested by respondent:

Change the key description to "County Geological Sites".

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26662

Object

Supporting Documents, Ipswich Local Plan Policies Map (IP-One Area Inset) Final Draft**Respondent:** Historic England**Summary:**

Regarding the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map IP-One Area inset and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas. However, these areas do not match up with illustrative boundaries in The Ipswich Key Diagram. The opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.

Change suggested by respondent:

The opportunity areas need to be clearly defined and labelled on the IP-One policies map.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26638

Object

Supporting Documents, Ipswich Local Plan Policies Map Final Draft**Respondent:** Ipswich School**Agent:** Mr Matt Clarke**Summary:**

Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "Land Allocated for Sport Use" as it is not required for this purpose.

The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable. The school owns other land that would provide suitable land for replacement playing fields within the vicinity and has invested significantly in new and improved facilities at Rushmere St Andrew Sports Centre. It is proposed the site is allocated for 500 dwellings. See accompanying letter for details.

Change suggested by respondent:

Allocate the site for 500 dwellings and not sports use.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26305

Object

Supporting Documents, Ipswich Local Plan Policies Map Final Draft**Respondent:** Mersea Homes Limited**Agent:** Mersea Homes Limited**Summary:**

With regard to land use designations within the IGS, there is a lack of clarity/consistency to terminology, and in any event there is no need for specific land use allocations within the overall IGS, or justification for the specific areas shown.

Change suggested by respondent:

Removal of land use allocations within the overall IGS allocation, or at least adjustment to the key/text to make clear that all are indicative.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

Sustainability Appraisal Report Final Draft

Record count: 11

26591

Object

3 - Stage B: Developing Alternatives and Assessing Effects

Respondent: Bloor Homes

Summary:

Appendix F sets out our full concerns. In summary, the SA has not considered the spatial strategy actually set out in the Local Plan. An option has been assessed which the Council consider to be close to the spatial strategy chosen, but they are different. It appears that Spatial Option 1, the option most closely aligned with the spatial strategy in the Local Plan, has been scored unjustly positively in some areas, and Spatial Option 2 has been scored more poorly. The SA prepared alongside the emerging Local Plan does not provide the necessary justification of the proposed spatial strategy.

Change suggested by respondent:

The SA requires updating to accurately score/ assess the spatial options and then review whether the strategy proposed is suitable and reasons for rejection (if still applicable). A direct assessment of the spatial option proposed is required.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26288

Support

4 - Stage C: Prepare the SA Report

Respondent: Natural England

Agent: Natural England

Summary:

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

Change suggested by respondent:

N/A.

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

26505

Object

3 - Stage B: Developing Alternatives and Assessing Effects**Respondent:** Northern Fringe Protection Group**Summary:**

The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.

Change suggested by respondent:

Land in the centre of Ipswich earmarked for expanded retail and car parking should be assessed as a viable alternative.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26501

Object

4 - Stage C: Prepare the SA Report**Respondent:** Northern Fringe Protection Group**Summary:**

SA simply assumes that CS fully implemented and full funding for all measures secured. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. SA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Change suggested by respondent:

Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

26504

Object

Appendix A - Review of Plans, Programmes and Environmental Protection Objectives

Respondent: Northern Fringe Protection Group

Summary:

Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Change suggested by respondent:

SA needs to assess reduced housing figure of Suffolk Coastal.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26345

Object

1 - Introduction

Respondent: Save Our Country Spaces

Summary:

Highly material is the decision/ judgement released from The Supreme Court on Climate Change and development- (Heathrow)¹. This needs referencing and being taken into account within Local Plans as it is a fundamental game changer with respect to Local Plans, Strategic Planning and Local Development Control and Planning Committee decision making. This new case law could make Local Plans, where Paris Agreement on climate change, (concluded in December 2015 and ratified by the United Kingdom in November 2016) isn't adequately taken into account or doesn't demonstrate conformity to within Strategic Environmental Assessment challengeable and potentially unlawful. Extract from judgement included.

Change suggested by respondent:

New case law of the Heathrow Supreme Court Decision needs to be taken into account.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26341

Object

3 - Stage B: Developing Alternatives and Assessing Effects

Respondent: Save Our Country Spaces

Summary:

Appears that environmental, social and economic effects of plan(s) are inadequately/ inaccurately assessed against HRA and the SA. The SEA Directive requires that assessment include identification of cumulative and synergistic effects, including other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion. Needs to fully assess the implications on building on HDL and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

Change suggested by respondent:

Needs to fully assess the implications on building on HDL and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26378

Object

3 - Stage B: Developing Alternatives and Assessing Effects

Respondent: Save Our Country Spaces

Summary:

The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.

Change suggested by respondent:

Land in the centre of Ipswich earmarked for expanded retail and car parking should be assessed as a viable alternative.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26485

Object

3 - Stage B: Developing Alternatives and Assessing Effects

Respondent: Save Our Country Spaces

Summary:

No SA of:

- Lack of sewage infrastructure for IGS and ISPA and environmental impacts of new sewage infrastructure (emissions and traffic congestion)
- air quality or noise assessment in relation to rail transport (Ipswich Chord and Freight yard) and additional freight to/from Port of Felixstowe,
- environmental impacts of Port of Ipswich.
- potential impacts of increased freight traffic on IGS pedestrian bridge and Westerfield rail crossing
- decision to destroy Green Rim by building homes on ISPA4 and re-designating as Green Trails.
- lack of full appraisal of the impacts on building ISPA4.
- omitting Climate-Emergency Declaration

Change suggested by respondent:

Update SA with required assessments.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

26373

Object

4 - Stage C: Prepare the SA Report

Respondent: Save Our Country Spaces

Summary:

SA simply assumes that CS fully implemented and full funding for all measures secured. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. SA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Change suggested by respondent:

Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26377

Object

Appendix A - Review of Plans, Programmes and Environmental Protection Objectives**Respondent:** Save Our Country Spaces**Summary:**

The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan10 (paragraph 12.209). The SA fails to assess this and is unsound.

Change suggested by respondent:

SA needs to assess reduced housing figure of Suffolk Coastal.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

Supporting Documents

Record count: 8

26287

Support

Supporting Documents, Habitats Regulations Assessment of the Ipswich Borough Council Local Plan at Final Draft Stage (Sept 2019)

Respondent: Natural England

Agent: Natural England

Summary:

We are satisfied that the Habitats Regulations Assessment has provided a robust assessment of the Ipswich Local Plan final draft, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant caselaw. We are pleased that the recommendations for the strengthening of policy wording in the HRA screening report have been incorporated within the final draft of the Core Strategy, and issues carried forward into the Appropriate Assessment stage as we would expect, with recommendations for appropriate mitigation.

Change suggested by respondent:

N/A

Legally Not specified

compliant:

Sound: Yes

Comply with Not specified

duty:

Attachments:

26502

Object

Supporting Documents, Ipswich LP Health Impact Assessment

Respondent: Northern Fringe Protection Group

Summary:

Assumes that CS fully implemented and full funding for all measures. No evidence delivery of improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record regarding this is dire. HIA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, climate change declaration, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Change suggested by respondent:

Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), climate change declaration, flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

26503

Object

Supporting Documents, Habitats Regulations Assessment of the Ipswich Borough Council Local Plan at Final Draft Stage (Sept 2019)**Respondent:** Northern Fringe Protection Group**Summary:**

HRA assumes that CS fully implemented and funding for all measures. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. HRA incomplete and underplays key issues. Needs to fully assess air quality impacts, AQAP and IGS non-compliance with DM3 including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk, new sewage infrastructure and robustness if unprecedented levels of modal shift underachieved.

Change suggested by respondent:

Needs to fully assess air quality impacts, non-compliance of AQAP and IGS with DM3, including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26539

Object

Supporting Documents, Habitats Regulations Assessment of the Ipswich Borough Council Local Plan at Final Draft Stage (Sept 2019)

Respondent: Northern Fringe Protection Group

Summary:

Opening comments on SA, apply to HRA.

HRA incomplete and must address impacts of:

1. Proposed re-designation of Green Rim.
2. New sewage infrastructure required for growth.
3. Required traffic infrastructure identified by traffic modelling
4. Non-compliance of IGS AQA with DM3.
 5. Emissions from rail and shipping.

If no such assessments are included in the HRA then needs to explain why. IBC's response to the recommendations in relation to Paragraph 1.29 is not acceptable. CS needs strengthening to ensure compliance with this recommendation especially given Green Rim redesignation. Also whether lack of S106 payments for RAMs IGS sites acceptable.

Change suggested by respondent:

Update HRA accordingly.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

26374

Object

Supporting Documents, Ipswich LP Health Impact Assessment

Respondent: Save Our Country Spaces

Summary:

Assumes that CS fully implemented and full funding for all measures. No evidence delivery of improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record regarding this is dire. HIA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, climate change declaration, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Change suggested by respondent:

Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), climate change declaration, flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26346

Object

Supporting Documents, Habitats Regulations Assessment of the Ipswich Borough Council Local Plan at Final Draft Stage (Sept 2019)

Respondent: Save Our Country Spaces

Summary:

Heathrow decision highly material. Needs referencing and assessment regarding Local Plans, Strategic Planning and Local decision making. New case law could make Local Plans, where Paris Agreement on climate change isn't adequately taken into account or doesn't demonstrate conformity to within HRA challengeable and potentially unlawful. Extract from judgement included. Fails to take into account non-compliance of the AQAP with Government guidelines, non-compliance of the AQA for the IGS with DM3 and train and shipping emissions, especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site.

Change suggested by respondent:

Not specified

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26376

Object

Supporting Documents, Habitats Regulations Assessment of the Ipswich Borough Council Local Plan at Final Draft Stage (Sept 2019)

Respondent: Save Our Country Spaces

Summary:

HRA simply assumes that CS fully implemented and full funding for all measures secured. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. HRA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Change suggested by respondent:

Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

26491

Object

Supporting Documents, Habitats Regulations Assessment of the Ipswich Borough Council Local Plan at Final Draft Stage (Sept 2019)**Respondent:** Save Our Country Spaces**Summary:**

Opening comments on SA, apply to HRA.

HRA incomplete and must address impacts of:

1. Proposed re-designation of Green Rim.
2. New sewage infrastructure required for growth.
3. Required traffic infrastructure identified by traffic modelling
4. Non-compliance of IGS AQA with DM3.
5. Emissions from rail and shipping.

If no such assessments are included in the HRA then needs to explain why. IBC's response to the recommendations in relation to Paragraph 1.29 is not acceptable. CS needs strengthening to ensure compliance with this recommendation especially given Green Rim redesignation. Also whether lack of S106 payments for RAMs IGS sites acceptable.

Change suggested by respondent:

Update HRA.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:
