

Strategic Housing Land Availability Assessment Final Report

Ipswich Borough Council

March 2010



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1. Introduction

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) is a key component of the evidence base underpinning the Local Development Framework (LDF), by identifying a list of sites which may be suitable and available for housing development. The purpose of the study is to identify sites with potential for housing development but the study does not make any decisions about site allocations. These decisions will be made in the Council's site allocation development plan documents, which are principally the Site Allocations and Policies document and the IP-One Area Action Plan. Any site identified with potential for housing development will also need to be assessed through the planning process and also be the subject of sustainability appraisal before any development can occur.
- 1.2 In order to achieve this Planning Policy Statement 3 (PPS3) requires local authorities to identify specific deliverable sites within their LDF which will deliver housing for the first 5 years from adoption of the relevant development plan document (DPD) and then to identify locations and sites that will enable the delivery of housing for at least 15 years from the date of adoption of the development plan document. The SHLAA is required by PPS3 to provide at the local level evidence of the opportunities to meet the need and demand for housing in the Borough. A wider Strategic Housing Market Assessment (SHMA) for Ipswich Borough Council, Suffolk Coastal District Council, Babergh District Council and Mid-Suffolk District Council has already been undertaken and that document highlighted amongst other things, the close relationship in housing market terms between the Ipswich and Suffolk Coastal areas and as such a joint approach to a SHLAA is considered appropriate. With regard to the other two authorities i.e. Babergh and Mid-Suffolk these two councils have recently completed a joint SHLAA with their other neighbouring authorities namely Forest Heath and St Edmundsbury. Compatibility between this SHLAA and the other joint SHLAA is important to provide a detailed picture for the SHMA area.
- 1.3 Detailed guidance on producing a SHLAA was published in July 2007 by the Department of Communities and Local Government (DCLG) 'Strategic Housing Land Availability Assessments Practice Guidance' (the Guidance). The Guidance strongly recommends the use of the standard methodology set out within it, noting that in doing so a local planning authority should not need to justify the methodology used in preparing its assessment including at independent examination. A methodology was drafted in line with the approach suggested in the Guidance, but included where appropriate local interpretations and definitions appropriate to the Ipswich and Suffolk Coastal local area (the study area). The map in Annex A shows the Ipswich study area consisting of the IP-One Area Action Plan area and the rest of the Borough.
- 1.4 A four-week consultation with stakeholders in respect of the draft methodology occurred from 23rd October – 24th November 2008. A full list of stakeholders consulted is shown in Annex B. Comments were noted and the response of the two councils is shown in Annex C.
- 1.5 DCLG advocate a partnership approach when undertaking a SHLAA to ensure a joined up and robust approach. To ensure this is achieved the SHLAA has been carried out by the both Ipswich Borough Council and Suffolk Coastal District Council. This report however only focuses on the

administrative area of Ipswich Borough Council. Suffolk Coastal District Council will produce a draft report for their administrative area.

- 1.6 The purpose of the SHLAA as noted in the methodology is to identify sites with potential for housing, assess their housing potential, and assess when they are likely to be developed. It is important to remember the SHLAA is an evidence base document and does not make site allocations. This will be done principally through the IP-One Area Action Plan, and the Site Allocations and Policies Development Plan Documents (consultation in 2010 and subject to sustainability appraisal).
- 1.7 The SHLAA identifies potential housing sites at a particular point in time, in this instance April 2009. However, the SHLAA will be regularly monitored and reviewed as sites become available and others are taken out of the supply, with an updated report produced as part of the annual monitoring process. In addition Ipswich Borough Council is required to demonstrate an ongoing five-year supply of sites available for housing in accordance with Government guidance and some of the sites identified within the SHLAA, where they have already been identified in the Local Development Framework and have political support can contribute to this.

2. Ipswich Borough Council Housing Requirements

- 2.1 The Regional Spatial Strategy for the East of England, known as the 'East of England Plan' requires Ipswich Borough Council to deliver 15,400 homes between April 2001 and March 2021, 770 per annum. In addition the Borough Council is required to find 3,320 homes from April 2021 to March 2025, 830 per annum as identified in the East of England Plan. As at 31 March 2009, 6,177 dwellings had been completed since April 2001, with a further 823 under construction, 2,757 with planning permission, and 707 with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement). This leaves 4,936 homes to be found on new site allocations to 2021 with the additional 3,320 homes to 2025.

3. SHLAA Methodology and stakeholder involvement

- 3.1 The SHLAA methodology was produced in partnership with Suffolk Coastal District Council and was consulted on with stakeholders in October and November 2008. The methodology was produced in accordance with Government practice guidance.
- 3.2 The guidance advocated a partnership approach to producing the SHLAA and engagement with key stakeholders defined as in the methodology as:
 - Government Office for the East of England
 - Registered Social Landlords
 - Suffolk County Council
 - Home Builders Federation
 - Other neighbouring authorities
 - Major planning agents/builders operating within the SHLAA area
 - Homes and Communities Agency

- 3.3 In addition, Ipswich Borough Council invited a number of key stakeholders to a stakeholder engagement workshop in Ipswich in May 2009. These stakeholders were asked about their views on the current market climate and their opinions on the suggested delivery of a number of sites. A list of attendees and a summary of the key points raised at this workshop is shown in Annex D.
- 3.4 A separate meeting organised by Suffolk Coastal District Council took place in Woodbridge in September 2009 to discuss a selection of their sites and likely delivery.
- 3.5 Ipswich Borough Council produced a draft report in September 2009, which was put out for public consultation alongside the Council's Proposed Submission Core Strategy and Policies development plan document between 2nd October and 27th November 2009. A number of representations were received and a full table of representations is available on request. For the purposes of the final report the Council has summarised the general representations on the draft report and the site-specific representations in Annex G together with the Council's response.
- 3.6 This report sets out the position known to the Council in January 2010 and some of the likely delivery timescales have been changed from 2009-2014 to 2010-2015 to reflect the current position. As mentioned in Paragraph 1.7 of this report, the SHLAA will be updated as part of the annual monitoring process.
- 3.7 During the consultation process it was highlighted that some of the site boundaries were incorrect and these have been amended accordingly and result in some slight changes in the indicative capacity of individual sites.
- 3.8 There was a question emerging from the consultation process around the inclusion of student accommodation. In the absence of clear guidance on whether or not to include student accommodation in the housing supply, the Council has highlighted where a site has a permission for student accommodation and the number of student accommodation dwellings to be delivered. This is calculated using the definition from DCLG regarding Communal establishments, which states that purpose-built (separate) homes such as self-contained flats clustered into units with 4 to 6 bedrooms should be counted as a dwelling. The approved layout plans from the planning applications for student housing are used to establish how many 'separate homes' there are in the development. Every cluster of 4 to 6 bedrooms with a shared kitchen and bathroom behind an entrance door is counted as one dwelling.

4. The SHLAA process

- 4.1 The sites identified in the SHLAA were from a variety of sources including reviewing existing housing allocations, unimplemented and outstanding planning permissions, sites suggested by developers, landowners and other interested parties, sites identified in the previous Urban Capacity Study and greenfield sites. A base date of 1 April 2008 was used for site selection. The methodology set the site threshold for consideration of at least 0.1 ha or a capacity of 10 dwellings or more in IP-One and at least 0.2 ha or a capacity of 10 dwellings or more in the rest of the Borough.

- 4.2 The sites were mapped onto a GIS layer and planning officers undertook a site visit of each site using the site assessment form shown in Annex E.
- 4.3 The information collected from the site visits was entered into spreadsheet and stored electronically. This will be updated regularly as information becomes available to ensure an accurate record of housing land supply and the SHLAA is required to be updated annually through the Annual Monitoring Report.
- 4.4 A total of 186 sites were identified and considered through the SHLAA process and those suggested for inclusion in years 1-5 (2010-2015) and years 6-10 (2015-2020) were explored further at the stakeholder workshop. Of these 186 sites, 6 have been sub-divided due to availability at different timescales, therefore totalling 192 sites. In the absence of individual sites for years 11-15 (2020-2025), a broad location to the north of Ipswich is considered, however as the individual sites that make up this broad location have been identified by developers, landowners and other interested parties, we have put all of these initially in years 6-10. As mentioned earlier in the report, the SHLAA does not allocate sites, however it is realised that some of this broad location could be included in the supply of years 6-10 if required.

5. Discounting sites

- 5.1 In assessing the housing potential of sites, it was necessary to ascertain first of all whether they were suitable for housing development and if so whether they were available or likely to be available during the first ten years. Where we were uncertain about the intentions of a landowner or tenant, we wrote to these enclosing a landownership form, which asked about their intentions for years 1-5, 6-10, 11-15 and 16-20, shown in Annex F.
- 5.2 It was identified that some sites although available and theoretically could accommodate housing on the site, there were major constraints such as flooding or pollution, which would prevent housing development occurring and would be too difficult to overcome during the plan period. These have been noted in the site sheets contained in Annex J of this report.
- 5.3 In total 56 sites have been identified as suitable for housing development but not deliverable, and 22 sites have been identified as not suitable for housing development. There were 6 sites, which have been built since 1 April 2008 and a further 3 sites currently under construction. 31 sites currently have planning permission or planning permission recently expired not including student accommodation. We anticipate most of these sites to be delivered between 2009 and 2015, although in some instances the total dwellings granted planning permission, it is suggested, will need to be reduced in light of current market conditions.

6. Assessing when and whether sites are likely to be developed

- 6.1 In assessing when and whether sites are likely to be developed it is necessary to ascertain whether they are deliverable, that is within years 1-5 or developable within years 6-10 and in the case of this SHLAA a broad location for years 11-15. Definitions of deliverable and developable are shown below:

- **Deliverable** – if a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the adoption of the plan; and
- **Developable** – if the site is in a suitable location for housing development and there is a reasonable prospect that the site will be available and could be developed at a specific point in time.

A site is considered suitable, available and achievable as follows:

- Suitable – a site offers a suitable location for housing development and would contribute to the creation of sustainable, mixed communities.
- Available – a site is considered available for development, when on the best information available, there is confidence that there are no legal or ownership problems.
- Achievable – a site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time.

The site sheets contained within Annex J show whether we consider a site to be suitable, available and achievable.

- 6.2 Where it is unknown when a site could be developed then it will be regarded as not currently developable. Where sites do not meet all three of this criteria they have been discounted as per section 5.
- 6.3 Sites that do meet the criteria have been assessed for likely housing potential and timing of deliverability. Table 1 shows the density assumptions for each site.

Table 1: Estimating the housing potential of sites

IP-One (Waterfront)	Rest of IP-One	Within 800 metres of a district centre	Rest of Borough
High density – 165 dwellings per hectare	High density – 110 dwellings per hectare	Medium density – 45 dwellings per hectare	Low density – 35 dwellings per hectare

- 6.4 In addition to estimating the housing potential of sites, in order to ensure a realistic element of deliverability, it was assumed that those sites with other uses identified in the preferred options of the Council’s development plan documents were taken into consideration.
- 6.5 The sites were categorised between those in IP-One and those in the rest of the Borough in accordance with the two Development Plan Documents currently being progressed through the Local Development Framework. It was found that 2,095 dwellings were developable in IP-One and 7,355 in the rest of the Borough. The latter figure includes 5,960 on the broad location to the north of the town. In terms of timing, it is suggested that 623 dwellings in IP-One area are deliverable in Period 1 and 1,472 in Period 2. In the rest of the Borough, it is suggested that 902 dwellings are deliverable in Period 1 and 6,453 dwellings in Period 2, although this includes the broad location to the north of the town. If we discount this broad location, the figure is 493 dwellings and therefore it is recognised that to ensure a continuous 15-year land supply, some of the 5,960 should be included in Period 2. However, it is the role of the Local Development Framework to identify which sites should be allocated for years 6-10 and which for 11-15. A full list of sites for each area can be seen in Annex H together with their likely delivery timescale.
- 6.6 The current economic climate has meant that a number of brownfield sites available for development are less likely to be achievable in the first five years. The SHLAA is intended to take a long-term view and therefore these are assumed to be achievable in years 6-10. The SHLAA is to be reviewed annually and changes can be made in light of the market conditions at the time.
- 6.7 The site sheets shown in Annex J show a number of constraints, which are explained in more detail below and have been considered in accordance with the site assessment checklist shown in the methodology.

Access and Highways

Where the site has a restricted access and/or a detrimental impact on either the local or trunk highway network or both, yes has been entered into the constraint box. Where there is a possible access constraint or impact on the highway network then possible has been entered into the constraint box.

AQMA within or close to

A site within or close to an Air Quality Management Area (AQMA) has yes in the constraint box. Where a site has a potential impact on air quality, for example if traffic feeds into an AQMA or the site has the potential to generate a large amount of traffic, then possible has been entered into the constraint box.

Area of Archaeological Importance

Where a site is within the area of archaeological importance defined within the adopted Ipswich Local Plan (1997), then yes has been entered into the constraint box. Where it has been suggested by other parties that the area is a site of archaeological importance, possibly has been entered into the constraint box.

Conservation Area

Where a site is within a conservation area defined within the adopted Ipswich Local Plan (1997), then yes has been entered into the constraint box. Where a site is adjacent to a conservation area and could therefore impact upon it, this has been noted in the constraint box.

Contaminated

It is not possible to say if a site definitely has contamination or not where this is not known, however it is possible to say a site has possible contamination due to a previous use or where the storage of hazardous substances may have taken place. Furthermore, for any housing planning application, a contamination assessment needs to occur.

Existing Use

A number of the sites suggested as suitable for housing development have existing uses upon them. Where these are in areas clearly defined for employment for example, it is often the case that although the area could be redeveloped, it is not likely to happen and therefore the site is not deliverable. Where there are a few uses on the site and there is a prospect the site could be redeveloped upon relocation of the existing businesses then possibly has been entered into the constraint box. As this is a long-term study it is not possible to know exactly if a business will relocate or if a site will become vacant, but we publish this document to the best of our knowledge and if it later transpires that a site is actually not going to be available for redevelopment it can be deleted from this study in the future as this document will be updated annually as mentioned earlier.

Flood Zones 2 & 3

A site within Flood Zones 2 or 3 as defined by the Environment Agency in January 2009 has a yes in the constraint box. It is recognised that a number of sites have significant flood risk constraints and these will be assisted by the construction of the proposed flood barrier. Surface water flooding is also recognised as an issue and will be addressed in a level 2 Strategic Flood Risk Assessment, identifying areas at risk of surface water flooding.

Listed Buildings or adjacent to

Sites which have Listed Buildings on site have a yes in the constraint box and those either adjacent or opposite a Listed Building or buildings have either adjacent or opposite in the constraint box.

Recreation and open space

Sites that have are defined as recreation or open space areas have a yes in the constraint box.

TPO on site or nearby

Sites that have a Tree Preservation Order(s) on the site or nearby have yes in the constraint box.

Wildlife site or adjacent to

A wildlife site in the context of this document has been defined as a Local Wildlife Site or County Wildlife site. Where a site is not designated as a wildlife site, but there are clearly wildlife features, for example the site is countryside, then countryside has been entered into the constraint box.

Other constraints

These can include noise for example and are mentioned in the summary box of each site sheet.

- 6.8 A number of sites also have significant constraints whether it be a site at risk of flooding and dependent upon construction of the proposed flood barrier, or a greenfield site where a significant amount of new infrastructure is needed. These types of constraints can be overcome although it is suggested that sites with significant constraints of this type are more likely to be deliverable within years 6-10.

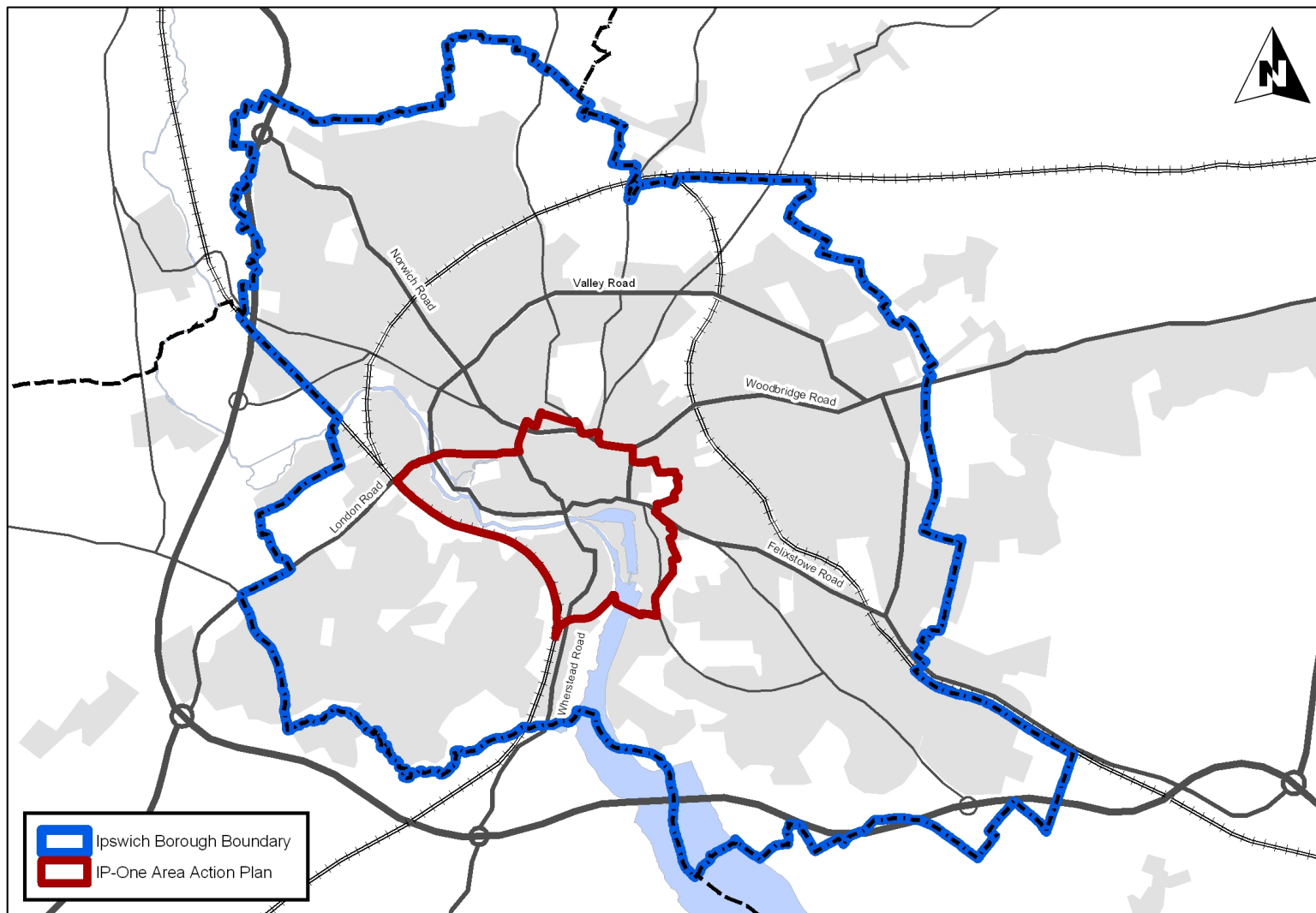
7. Review of the Assessment

- 7.1 Ipswich Borough Council is publishing the SHLAA as evidence base for the Local Development Framework and in particular at this stage the Proposed Submission Core Strategy and Policies. This document does not allocate sites for housing development. The purpose of the SHLAA is to assess the deliverability and developability of sites and information contained within this document will be used to inform an indicative housing trajectory for the Borough, setting out how much housing can be provided and when.
- 7.2 As stated earlier the SHLAA will be reviewed annually to ensure an accurate supply of sites for housing development if required. It may be that some sites are removed from the SHLAA pool as no longer being available or deliverable, while new sites may also come to our attention.

8. Contacts

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Map: Ipswich Study Area



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SHLAA Stakeholder list

Registered Social Landlords and Housing Providers

Anchor Housing Association
Anchor Trust
Anglia Housing Group
Broadland Housing Association
Coastal Housing Action Group
Concern Housing
Co-op Homes Services
English Churches Housing Group
Flagship Housing Group
Granta Housing Association
Habinteg Housing Association
Hanover Housing Association
Hastoe Housing Association
Hereward Housing
Housing 21
Housing Corporation
Iceni Homes
Ipswich YMCA
Jephson Housing Association
London & Quadrant Housing Association
Orbit Housing Group
Orwell Housing Association
Presentation Housing Association Ltd
Raglan Housing Association Ltd
Richmond Fellowship Housing
Riverside Housing Group
Sanctuary Housing Association
Servite Houses
Shaftesbury Housing Association
SOLO Housing
St Matthew Housing
Stonham Housing Association
Suffolk Heritage Housing Association
Suffolk Housing Society
Swan Housing Association
Warden Housing Association
Wherry Housing Association

Planning agents/developers/builders

Associated British Ports
Adam Holmes Associates
Alfred McAlpine Developments
Alsop Verrill
Andrew Martin Associates
Apollo Capital Projects
Ashley Homes
Ashwell Developments Ltd
ASP
Atisreal
Barrett Eastern Counties

Barton Willmore
Beazer Homes
Beeson Properties Ltd
Bellway Homes
Bellway Urban Renewal
Berwicks
BG Properties
Bidwells
Bill Wilson Planning Ltd
Birketts Solicitors
Bloor Homes
Boyer Planning Ltd
Braceforce Properties
Brimble, Lea & Partners
Broadlands
Broadway Malyan Planning
Brown & Co
Bryant Homes Hertford Ltd
Carter Jonas
CB Hillier Parker
CB Richard Ellis
Charter Partnership
Chelsteen Homes
Chris Thomas Ltd
Churchmanor Estates Company Plc
Clarke & Simpson
Crest Nicholson Ltd
Cushman and Wakefield
David Clarke & Associates
David Hicken Associates Ltd
David Lock Associates
David Walker Chartered Surveyors
David Wilson Estates
Davies Arnold Cooper
Development Planning & Design Services
Development Planning Partnership
D J Trower Ltd
Don Proctor Planning
Donaldsons
Drivers Jonas
DTZ Consulting and Research
DTZ Debenham Thorpe
EWS Chartered Surveyors
Fairview New Homes Ltd
Farningham McCreadie Partnership
Featherstone Builders Ltd
Firstplan
FPD Savills
FRCA
Fuller Peiser
G L Hearn Planning
George Wimpey plc
Gerald Eve
Gladstone Homes Ltd
GMA Planning

Mr Gordon Terry
Gough Planning Services
Grantham Parsons and Nolan Ltd
Greystoke & Everleigh Ltd
Grove Builders
Guardian Royal Exchange Properties
GVA Grimley
Harris Lamb Planning Consultancy
Healey & Baker
Higgins Homes Ltd
Hopkins Homes
Indigo Planning
Ingleton Properties Ltd
Mr J Martin-Shaw
J S Bloor
January's
JB Planning Associates
John Field Consultancy
John Newton Associates
Jones Lang LaSalle
Kesgrave Covenant Ltd
KLH Architects
Lawson Planning Partnership
Lennon Planning Ltd
Level
Martin Robeson Planning Practice
McCarthy & Stone Developments Ltd
Merchant Projects
Mersea Homes
Nathaniel Lichfield & Partners
Neil Ward Associates
Peacock & Smith
Peacock Short Property Solutions
Pegasus Planning Group
Persimmon Homes (Essex)
Peter J Hamilton & Associates
Phillips Planning Services Ltd
Planning Potential
Premier Planning
Pullman Development Ltd
R G Carter Ipswich Ltd
Rapleys LLP
Redrow Homes (Eastern) Ltd
Robert Turley Associates
Robottom Developments Ltd
Roger Tym & Partners
RPS Chapman Warren
RPS Planning
RPS plc
S Sacker (Claydon) Ltd
Savills (L&P) Ltd
Smart Planning Ltd
Taylor Wimpey Developments
Terence O'Rourke Planning
Tetlow King Planning

The Fairfield Partnership
The Landscape Partnership
The National Trust
The Planning Bureau Ltd
Tomlinson Construction
Town Planning Consultancy
W S Atkins
W S Development
Wates Landmark
West and Partners
Wharfside Regeneration (Ipswich Ltd)
White Young Green Planning
Wilcon Homes Anglia Ltd
Wilson Connelly Home Counties
Wimborne Estates Ltd
Wimpey Homes
Wincer Kievenaar Partnership

Planning authorities

Babergh District Council
Mid Suffolk District Council
Waveney District Council

Other stakeholders

Anglian Telecom plc
Anglian Water Services Ltd
British Energy Group plc
British Gas
BT Group plc
Coal Authority
COLT Telecom Group plc
Defence Estates
E.On UK plc
East of England Development Agency (EEDA)
East of England Regional Assembly (EERA)
East of England Strategic Health Authority
Easynet Ltd
EDF Energy
English Heritage
Environment Agency
Equant UK Ltd
Essex and Suffolk Water Company
Fibrenet Group plc
Fibrespan Ltd
Friends, Families & Travellers Community Base
Fujitsu Services
Gamma Telecom
Global Crossing (UK) Telecommunications Ltd
GO-East
Highways Agency
Home Builders Federation
Hutchinson 3G UK Ltd
Internet-Central Ltd
Ipswich NHS Trust
Ipswich Primary Care Trust

Level 3 Communications
Local Health Partnerships NHS Trust
MCI WorldCom Ltd
MLL Telecom Ltd
Mobile Operators Association
National Grid
National Housing Federation
National Power plc
National Trust
Natural England
NEOS Networks
Network Rail
Newnet plc
NHS
Norfolk, Suffolk & Cambridgeshire Strategic Health Authority
NTL UK
Nuclear Electric plc
O2 Airwave
Opal Telecom
Orange
Pipex
Powergen Retail Ltd
Reach Europe
Redstone
Shelter
Sport England
SSE Telecom
Suffolk Biodiversity Partnership
Suffolk Coastal Primary Care Trust
Suffolk County Council
Suffolk East Primary Care Trust
Suffolk Health Authority
Suffolk Mental Health Partnership NHS Trust
Suffolk Primary Care Trust
Suffolk Police
THUS plc
T-Mobile (UK) Ltd
Torch Communications Ltd
Transco East Anglia
UK Broadband Ltd
Vectone Services Ltd
Vodafone Ltd

Methodology consultation comments and council responses			
Consultee	Section of Document	Comments	Ipswich and Suffolk Coastal response
Anglian Water	General	Recommend that any sites chosen through the SHLAA criteria should then be tested for appropriateness using the Haven Gateway Water Cycle Study to check for environmental constraints and advise on infrastructure needs and suitable timing for the development.	Noted.
Barton Willmore	Stage 7, Table 6.	Table 6 states that greenfield sites and sites with major policy constraints should be marked as - -. Given the shift in emphasis from PPG3 to PPS3 with the dropping of the sequential test in PPS3 do not consider that housing sites should be penalised because they do not conform to current local plan policy, for example if they are outside the development boundary and therefore greenfield. The LDF can where appropriate allocate such sites for development, and so the SHLAA should look forward to identify appropriate housing sites, and should not be constrained by existing policy. A suitable greenfield site should be scored +.	Noted. Have deleted this row from Table 6 and the scoring criteria in accordance with Planning Advisory Service guidance.
Barton Willmore	Stage 7, Table 6.	A suitable greenfield site could be more appropriate to develop than a brownfield site, and in the scoring system for Suitability for housing and Previously developed land or brownfield, sustainable greenfield sites should score higher. Propose that the scoring system should be amended to better recognise the benefits of developing sustainable greenfield sites.	Noted. Have deleted reference to previously developed land (PDL) or greenfield site from Table 6, as this would be a subsequent policy decision, and have deleted the scoring criteria in accordance with Planning Advisory Service guidance.

Barton Willmore	Para 2.26 (now para 2.25)	Para 2.26 (now para 2.25) of the councils SHLAA methodology states that should a shortfall of sites be identified then broad locations for growth should be identified or a windfall allowance should be investigated. Paragraph 43 of the Communities and Local Government Strategic Housing Land Availability Assessment Practice Guidance, states that when the Assessment is reviewed "it may be concluded that insufficient sites have been identified and that further sites need to be sought." This implies that broad locations for growth and windfall allowances should not be the only way of addressing a housing shortfall if specific sites are available to provide a housing supply for the full 15 years of a plan.	Noted. Guidance from the Planning Advisory Service states: "possible broad locations should be assessed in the same way as identifiable sites so as to provide a rounded assessment of potential sources of supply, with consistent information on deliverability / developability."
Boyer Planning	General	Support the general methodology, as it would seem consistent with the Practice Guidance.	Noted.
Boyer Planning	Stage 1	The local planning authorities need to be certain that the methodology and assessment of sites identified within the SHLAA provide a degree of certainty as to its findings.	Noted, this will be achieved through stakeholder engagement.
Boyer Planning	Stage 2 & 3	The purpose of the SHLAA is to identify sites capable of being delivered for housing and the development of sites, such as vacant garage blocks and other incidental areas of vacant urban land, tend to come forward as opportunities rather part of any forward planning process.	Disagree. We will include brownfield sites such as vacant garage blocks where we know there is potential for them to be redeveloped in the future for housing.
Boyer Planning	Stage 2 & 3	Insofar as reviewing existing information is concerned, it will be important to have regard to sites that might be identified for other possible uses.	Noted, some sites identified for other uses have been included in the study.
Boyer Planning	Stage 4	The Practice Guidance is quite clear that the SHLAA is to exclude windfall sites until very much later in the process. The site threshold as identified in paragraph 2.19 (now para 2.18) should be adhered to.	Noted. The site size threshold will be adhered to.

Boyer Planning	Stage 5	We assume that all the characteristics listed within para 2.16 (now para 2.15) will be set out clearly in the SHLAA consultation document to allow such details to be verified.	Correct.
Boyer Planning	Stage 6	The same situation applies in respect of this stage that developers and landowners will have the opportunity to respond to the housing potential of individual sites. Such potential will depend on a range of factors including market demand and viability of proposals.	Agree.
Boyer Planning	Stage 7	Verifying the conclusions and information contained within Stages 5, 6 and 7 of the SHLAA will need the crucial input of developers and landowners and for such inputs to be given considerable weight.	Stakeholder consultation is planned on the draft report.
Boyer Planning	Stage 7, Table 6	The SHLAA document is intended to identify potential housing land and the Practice Guidance does not seek to differentiate between greenfield sites and previously developed land. Accordingly, that a site may be constrained either because it is greenfield or previously developed land is not relevant and should be deleted as a key issue from Table 6. Whether or not a site is greenfield or previously developed land is not a measure of constraint in itself other than where previously developed land is the subject of contamination or other physical constraints.	Noted and have deleted this row from Table 6.
Boyer Planning	Stage 7, Table 6	Correctly flood risk is identified as a key issue in identifying future housing sites. However there is an error in the Flood Risk Key Issue in that Flood Zone 3b comprises functional flood plain whereas Flood Zone 3a in certain circumstances can be considered appropriate for housing development. Sites in Flood Zone 3b are therefore more constrained.	Noted, document corrected.

Boyer Planning	Stage 8	Noted at para 2.25 (now para 2.24) that identifying new sites or re-visting assumptions made within the SHLAA will be undertaken by the two local planning authorities. It is crucial for those who have an interest in providing housing development within the area should be included as part of the process to ensure that full information has been made available to the local planning authorities.	Noted, stakeholders have the opportunity to be involved through consultation on the draft report.
Boyer Planning	Stage 9	It is acknowledged that the local planning authorities should take a lead in identifying broad locations for housing development within their respective areas. However the identification of such locations should have full regard to the availability of land for housing which can be developed in such areas and in that regard consultation with landowners and developers should form part of the process.	Noted. The two councils have consulted on the methodology and will consult again on the draft report.
Boyer Planning	Stage 10	Should the SHLAA require the need to rely on a windfall contribution then that needs to have regard to market considerations. Past take-up rates of windfall sites may not necessarily continue into the future. It will be a matter for consultation and assessment at that time.	Noted.
The Coal Authority	General	No specific comments to make.	No response necessary.

David Lock Associates	General	Fundamental concern that the timing of preparation of the SHLAA undermines the robustness and soundness of the emerging Ipswich LDF, on the basis that the SHLAA will not be finalised until consultation on the next stage of the DPD production process has commenced, and that previous stages of relevant DPDs will not have been adequately informed by the SHLAA.	Draft findings will be in place prior to consultation on the emerging LDF.
David Lock Associates	General	Concerned that the proposed methodology allows policy to influence the identification and assessment of sites, rather than being a technical exercise only. This is contrary to guidance on the preparation of SHLAAs.	Agree the SHLAA is a technical exercise only although the objective of maximising brownfield development continues. Have deleted reference to previously developed land (PDL) or greenfield site from Table 6, as this would be a subsequent policy decision.
David Lock Associates	General	Concerned that the proposed methodology fails to provide a robust basis for assessment in that it fails to recognise the potential for new services to be delivered in support of new development locations.	Agree larger sites have the potential to deliver new services, however this is an additional cost to the delivery of the site and first of all it is important to assess proximity to existing local services. Have added a row to Table 6 focusing on the potential for creating and/or improving access to services.
David Lock Associates	General	Concerned that inadequate consultation may mean that inadequacies in the identification and assessment of sites may not be apparent until conclusion of the SHLAA.	The two councils invited comments from a range of stakeholders and further consultation will take place once site assessments have been carried out.
David Lock Associates	Stage 2	Wish to be reassured that there is continuity between the Ipswich urban capacity study and the SHLAA and that no potential sites on the urban fringe could fall between these two definitions.	Noted. Where known, sites on the urban fringe of Ipswich have been included in the SHLAA. The list of sites was also consulted on alongside the methodology.
David Lock Associates	Stage 2	Advice published by the Planning Advisory Service explicitly explains that potential opposition to greenfield sites does not represent a reason for not identifying such sites as a potential source of land.	Agree. Greenfield sites are included in the SHLAA.

David Lock Associates	Stage 2	In referring to emerging LDF documents as a consideration in the identification of sites, it is suggested that the necessary policy neutrality set out in guidance is not being upheld. It would clearly be prejudicial to the findings of the assessment if emerging LDF policy were to influence the identification or assessment of the suitability of sites.	Agree, the SHLAA is a technical exercise, however guidance also clearly states that where sites have been considered in a local authority's preferred options, then they should be included in the SHLAA.
David Lock Associates	Stage 2	Concerns about policy impartiality relevant in relation to para 2.6 of the proposed assessment methodology. It is not clear how exactly the criteria or provisions of the last sentence of that paragraph will be determined or applied, although it is clear that the implication is that some degree of judgement will be applied to potential sites before they can be included as a potential source. With reference to para 21 of the Practice Guidance, would recommend that any suggestion of pre-determination of the suitability of sites must be avoided, and recommend the last sentence of this paragraph is removed.	Amend. To more properly accord with national guidance on this issue, the words "and of a scale appropriate" will be deleted.
David Lock Associates	Stage 6	The Practice Guidance includes advice at para 30 to help local authorities determine whether it is appropriate to use existing policies as a guide to inform site design variables (such as on density), which in turn informs capacity. Para 2.18 (now para 2.17) of the proposed methodology makes no reference to the appraisal of the suitability of existing policy. Recommend the proposed methodology be amended to recognise that existing emerging policy may not provide sufficient guidance for assessing the development capacity of sites, and that consideration must therefore be given to alternative means of assessing site capacities.	Noted, para 2.18 (now para 2.17) will be clarified making reference to the fact that when assessing densities a mix of factors will be used including national guidance, emerging policy and sample site information provided through the viability assessment work carried out in parallel with the Strategic Housing Market Assessment.

David Lock Associates	Stage 7	Recommend that the title of the 'policy restrictions' subsection in Table 6 refer only to existing policy, and not to 'emerging' policy.	Reference to emerging policy deleted.
David Lock Associates	Stage 7	Practice Guidance refers to specific policy considerations such as designations for protected areas, existing allocations or community policy, not to constraint policies. Suggest that the robustness of the SHLAA and any dependent plan policy is predicated on a fair and policy neutral approach to assessing sites, and that those policies to be used are set out clearly.	Noted. Methodology sets out such an approach.
David Lock Associates	Stage 7	Suggest that a priority afforded to previously developed land is a matter of policy, to be applied when allocating sites and that suitability is a matter of technical assessment for which PDL is not a relevant consideration.	Noted. Have deleted reference to previously developed land (PDL) or greenfield site from scoring assessment.
David Lock Associates	Stage 7	Recommend that the SHLAA methodology recognises both proximity to existing services, and the potential for delivering new services, as part of its evaluation of sites.	Noted. Agree larger sites have the potential to deliver new services, however this is an additional cost to the delivery of the site and first of all it is important to assess proximity to existing local services.
David Lock Associates	Stage 7	Need for community engagement to ensure the robustness of assessments.	Noted. Consultation will be carried out on the draft report.
David Lock Associates	Stages 8, 9 & 10	Would remind the authorities that the circumstances by which individual sites cannot be identified must be on a technical basis, rather than a policy basis.	Noted. Sites have been identified on a technical basis.
East of England Regional Assembly		Ipswich Borough Council and Suffolk Coastal District Council are commended for working together to develop this SHLAA methodology for the Ipswich Policy Area. The Assembly fully supports this approach.	Noted.

Environment Agency	General	The methodology outlined in the SHLAA document appears to conform to the government guidance and therefore no specific comments are to be made, except for three items: the site assessment form; the consultation process; and sustainable settlements.	Noted.
Environment Agency	Stage 7, Table 6	The site assessment form seems to take a broad-brush approach, arguably a simplistic approach. For instance, in relation to ecology it merely asks for species rich attributes. What about impacts on adjacent land or located where development could significantly affect a SSSI / national nature reserve? Does the site include or significantly affect any other site of local importance such as local wildlife site, ancient woodland and protected verge or affect protected habitat or species (if known)? Consider the need to set out a more detailed approach in order to capture full information.	Potential for cumulative impact effect as part of the assessment / and use made of sustainability appraisals already carried out. Footnote added to the site assessment checklist table: "Sites will be looked at on individual basis and their cumulative impact." Amended ecology row in Table 6.
Environment Agency	Stage 7, Table 6	Taking flood risk, it would be preferable if the landowner / developer was asked to indicate which flood zone the site lies in, i.e. Flood Zone 1, 2 or 3. The information is available on the Environment Agency Flood Maps on the Environment Agency website.	The councils already have this information along with the Strategic Flood Risk Assessment.
Environment Agency	Stage 7, Table 6	Regarding contaminated and hazardous land, ask the landowner / developer to advise whether the site falls within a groundwater source protection zone.	Both councils hold or have access to this information.
Environment Agency	Stage 7, Table 6	Would the site impact on an air quality management area (AQMA)?	Both councils hold or have access to this information, but have added a row in Table 6.
Environment Agency	Stage 7, Table 6	Does the site impact on the historic, cultural and built environment?	Both councils hold or have access to this information, but have added a row in Table 6.

Environment Agency	Consultation process	May be worthwhile having a panel of key stakeholders, including the statutory environmental bodies, who would consider and give advice and opinions on the draft SHLAA prior to its consideration and approval by the Councils. The panel membership could comprise LPA policy planners/engineers, volume house builders, small scale builders, land agents, planning consultants, registered social landlords involved in new build projects.	The two councils invited comments from a range of stakeholders on the methodology and site list, and further consultation will take place once site assessments have been carried out.
Environment Agency	Sustainable settlements	Purdis Heath is included as a major centre. It seems a bit too fragmented to justify meeting the description of a major centre.	Purdis Farm is part of a wider eastwards extension of Ipswich and is urban in character.
Highways Agency	Stage 7, Table 6	Table 6: Access & Highway: A significant amount of traffic emanating from Ipswich (and a lesser amount from Felixstowe) uses the A14 as a distributor route. Recent work by Suffolk County Council indicate that through traffic crossing the Orwell Bridge is only about 20% of total traffic. With concerns on the future capacity of the A14, there is a need to manage down demand. Consequently it is suggested that Access & Highway is split into local and trunk road segments with the trunk element based on an assessment of likelihood to use the A14 or possibly proximity to A14 junctions.	The Access and Highways criteria will be divided into two, with one focusing on the impact on the local road network and the other focusing on the impact on the trunk network.
Highways Agency	Stage 7, Table 6	Table 6: Access to Services: There is an option which picks up public transport, however there is no clear assessment of the opportunity for sustainable transport, i.e. opportunities not to use the car, opportunities for cycling, walking etc. This assessment is essential if future demand levels for transport are going to be effectively managed.	Noted. An additional row will be added assessing cycling and walking opportunities.

Merchant Projects	Stage 2	Urban extensions are a separate category of source, ensure continuity between the urban capacity study and the SHLAA and that no potential sites on the urban fringe (which may or may not constitute urban extensions) are excluded from consideration.	Noted. Where known, sites on the urban fringe of Ipswich as well as other towns have been included in the SHLAA and a list of sites was consulted on.
Merchant Projects	Stage 2	It would clearly be prejudicial to the findings of the assessment if emerging LDF policy was to influence the identification or assessment of the suitability of sites and the last row of Table 4 on page 9 is unfairly influenced by existing policies. Suggest the final sentence of this row is deleted.	Amend. Final sentence to be amended to read: "Any opportunities for urban extensions will be identified by means of sites submitted for consideration for allocation through the relevant DPD".
Merchant Projects	Stage 2	Suggest that any suggestion of the pre-determination of the suitability of sites must be avoided, and strongly recommend that the last sentence of para 2.6 is removed.	Amend. To more properly accord with national guidance on this issue, the words "and of a scale appropriate" will be deleted from para 2.6.
Merchant Projects	Stage 6	Suggest that the proposed methodology be amended to recognise that existing and emerging policy may not provide sufficient guidance for assessing the development capacity of sites, and that consideration must therefore be given to alternative means of assessing sites and site capacities, and in addition the issue of viability is adequately addressed particularly in the current economic cycle.	Noted, para 2.18 (now para 2.17) will be clarified making reference to the fact that when assessing densities a mix of factors will be used including national guidance, emerging policy and sample site information provided through the viability assessment work carried out in parallel with the Strategic Housing Market Assessment.
Merchant Projects	Stage 7	The Practice Guidance makes it clear that policies designed to constrain development must be regarded with considerable caution and emerging LDF policies that predate the SHLAA and are restrictive in nature should clearly be disregarded. Table 6 should consequentially be amended to give clarity on this issue.	Noted. Reference to emerging policy deleted.
Merchant Projects	Stage 7	Previously developed land PDL should not be criteria for selection, it is used to prioritise allocation not selection of suitable sites.	Noted. Have deleted reference to previously developed land (PDL) or greenfield site from Table 6.

Merchant Projects	Stage 7	Expect those sites subject to flood risk to be considered unsuitable for development when assessed through SHLAA.	Disagree, as with flood adaptation and mitigation measures in place, sites subject to an element of flood risk can be considered suitable for development.
Merchant Projects	Stage 7	Wrong to use the presence of local services as a determinant in selecting suitable sites. Suggest that the SHLAA methodology recognises both proximity to existing services, and the potential for delivering new services, as part of its evaluation of sites.	Noted. Agree larger sites have the potential to deliver new services, however this is an additional cost to the delivery of the site and first of all it is important to assess proximity to existing local services. Have added a row to Table 6 focusing on the potential for creating and/or improving access to services.
Merchant Projects	Stage 7	Suggest the viability assessment methodologies used for the SHLAA and SHMA should be compatible to allow comparison and consistency.	Agree.
Merchant Projects	Stage 7	Given the technical nature of many of the judgements required in respect of the criteria in Table 6, would suggest that developers be given an opportunity to advise the authorities in respect of specific sites, and suggest that the conclusions of the assessment be published for fact-checking before the SHLAA relies on the conclusions of the appraisals.	Agree. Developers and landowners have the option to complete the site assessment form available on each authority's website. Further consultation will take place once site assessments have been carried out. The councils also have data submitted with representations on the LDF from objectors.
Merchant Projects	Stages 8, 9 and the full 15 year supply	It is important that the preceding stages of the assessment have not included a bias which precludes certain types of site (for example, greenfield sites capable of delivering a new network of facilities and services) being taken forward to Stage 8. The circumstances by which individual sites cannot be identified must be considered on a technical, rather than a policy, basis. Windfall sites are clearly that and play no part in assessing the 15-year supply.	There is no bias as greenfield and brownfield sites are considered on an equal footing. The SHLAA is a piece of technical work to inform subsequent policy decisions.
Nathaniel Lichfield and Partners	General	As the methodology accords with the SHLAA Practice Guidance published in July 2007, are satisfied with the approach.	Noted.

Natural England	Stage 7, Table 6	In Table 6, under 'Developable limitations', 'Designated/protected area' is listed as one of the key issues. In addition to including whether or not a site falls within a designated/protected area, it should also be considered whether the development of a site would cause an indirect impact on designated/protected areas, through, for example, water resource/quality issues, increased recreational pressure.	Potential for cumulative impact effect as part of the assessment / and use made of sustainability appraisals already carried out. Footnote added to the site assessment checklist table: "Sites will be looked at on an individual basis and their cumulative impact."
Sport England	General	Wish to confirm its opposition to the potential allocation of any existing or former sports facilities for new housing development unless it could be demonstrated to their satisfaction that there was no longer a need to retain sites for sports use or satisfactory replacement provision was made. Sport England would only accept a site being surplus to requirements if it could be satisfactorily demonstrated that there is a surplus of facilities through an up-to-date sports facility assessment or playing pitch assessment prepared in accordance with the guidance set out in PPG17. This applies to both existing and former sites because former sports sites offer the potential to be brought back into use to meet current of future unmet needs.	Noted. There is an existing use in operation row in Table 6.
Sport England	General	In terms of the SHLAA Methodology, Sport England would encourage the existing or potential role of a site in meeting sports facility needs to be a material consideration when deciding which sites to progress to allocations.	Noted. This will be a policy decision rather than one affecting the developability of the land.

Ipswich SHLAA Stakeholder Workshop Attendance List – May 2009

Sue Bull	Anglian Water
David Barker	Barton Willmore
Isabel Lockwood	Bidwells
Jonathan Stoddart	CBRE
Andrew Hunter	Environment Agency
Doug Malins	Flagship Housing
Eric Cooper	Highways Agency
Christopher Smith	Hopkins Homes
Mike Goodson	Iceni Homes
Martin Blake	Merchant Projects
Stuart Cock	Mersea Homes
Andy Redman	Savills
Sarah Barker	Ipswich Borough Council
Denis Cooper	Ipswich Borough Council
Robert Hobbs	Ipswich Borough Council
Mike Tee	Ipswich Borough Council
Jason Wakefield	Ipswich Borough Council
Russell Williams	Ipswich Borough Council
Hilary Hanslip	Suffolk Coastal District Council

Key points raised at the Stakeholder Workshop

- Density of housing development – local development framework preferred options densities perceived as too high.
- Market for flats – perceived oversupply at present.
- Parking associated with housing development – in particular associated with flats.
- Existing use values of employment uses and retail – especially in the current economic climate.
- A comprehensive approach must be taken for any Northern Fringe development – to deliver the necessary infrastructure.
- Need to meet the jobs targets – when considering housing development on existing employment sites.

Ipswich & Suffolk Coastal SHLAA Site Assessment Form

Ipswich Borough Council and Suffolk Coastal District Council are undertaking a joint Strategic Housing Land Availability Assessment as part of the evidence base for the local development framework of each respective authority.

Site Assessment	
Settlement	
Site name	
Site reference	
Site size (hectares)	
Greenfield/Brownfield/Mixed	
Current planning status (under construction/detailed pp/outline pp/application submitted/none) / local plan allocation	
Form of development approved (if any) / recent planning history	
Current use(s)	
Surrounding land use(s)	
Character of surrounding area	
Physical constraints identified on site visit	
Initial assessment of what the site is suitable for	

Stage 7a – Suitability for housing	
Policy restrictions	
Designated/protected area	
Agricultural land classification	
Existing use in operation	
Developable limitations	
Contaminated and Hazardous land	
Flood risk	
Infrastructure – water/drainage/sewerage	
Access and Highways (local roads)	
Access and Highways (trunk roads)	
Potential impacts	
Impact on Landscape and Protected Trees	
Impact on the Historic Built Environment	
Ecology (species rich)	
Environmental conditions	
Proximity to noise and other pollutants	
Proximity to an Air Quality Management Area (AQMA)	
Access to services	
Local employment opportunities	
Public transport – bus or rail service	

Potential for creating and/or improving access to services	
Cycling and walking opportunities	
Access to convenience shop(s)	
Access to health centre/doctors' surgery	
Access to primary school	
Access to a meeting place (e.g. church, hotel with conference facilities, library)	
Access to public open space	
Stage 7b – Availability for housing	
Availability for housing – difference between availability and site ownership?	
Site ownership	
Stage 7c – Achievability for housing	
Achievability/viability – difference between achievability and market factors	
Market factors	
Cost factors	
Delivery factors	
Conclusion	

Landownership Form

The information on this form is to be used for the purpose of informing the evidence base for the preparing of the Ipswich Local Development Framework and the Strategic Housing Land Availability Assessment.

Would you be willing for the content of this form to be published on the Council’s website?

Yes No

Personal telephone numbers and e-mail details will not be published.

- 1. Site Reference:
- 2. Site Address:
- 3. Please can you confirm on the attached site sheet, which part of the site if not all you own and confirm your details below. If you are aware of other landowners on the site, please can you also give the details in the boxes and on an attached sheet of paper if necessary.

1.

Name: Company: Address: Post Code: Tel No: Email address:	
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2.

Name: Company: Address: Post Code: Tel No: Email address:	
--	--

3.

Name: Company: Address:	
Post Code: Tel No: Email address:	

4. Are there any tenants on the site?

Yes No

If you answered yes to question 4, please indicate how many tenants there are and when their lease expires?

Tenant 1. _____

Tenant 2. _____

Tenant 3. _____

5. What are your future intentions for the site? Do you intend to sell the land/relocate in the next few years? If yes, please indicate the likely timescale, within next 5 years, 6-10 years, 11-15 or 16-20 years)

6. Do you already have a contractual agreement with a developer to redevelop the site?

Yes No

Where possible please indicate the developer's name.

7. Would you be willing to meet with Planning Officers to discuss the possibilities for redevelopment of the site?

Yes No

8. Please advise if we have your correct contact details?

Yes No

Form completed by (Name) _____

Company name _____

Please give address if different from the address on the front

Address: Post Code: Tel No: Email:	
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On the (Date) _____

Thank you for your assistance.

*Please return the completed Form by ... to:
Planning Policy, Ipswich Borough Council, Grafton House, 15-17 Russell Road,
Ipswich, IP1 2DE*

Summary of general representations

Annex G

Consultee	Support /Object	Comments	Council response
Barton Willmore on behalf of Crest Nicholson	Object	Crest considers the level of brownfield land that could come forward will be less than [sic] is currently predicted in the SHLAA as many of the sites [sic] identified for development between 2015 and 2020 are not developable. Having reviewed the SHLAA we have particular concerns over a number of sites in the IP-One Area and in the Rest of the Borough that will be delivered between years 6 and 10. The SHLAA in our analysis is too optimistic about the development that can come forward in the IP-One area of Ipswich, particularly between 2015 and 2020. We do not consider that many of the sites which are in flood zone 3 are not [sic] a suitable location for housing and this could be the case even after the flood barrier is in place. Also many brownfield sites are still in alternative uses and have been for many years. We can see little justification in many cases for the SHLAA to conclude that many of these sites can come forward between 2015 and 2020 particularly when many could have come forward as windfalls in the recent housing boom.	We believe redevelopment on these sites will occur during the plan period as outlined in the SHLAA. Many of the sites identified for delivery in this time period are in flood zone 3 and we believe that these will be developable after the flood barrier is completed.
Dave Robinson	Object	The final version of the core strategy, which has just been published, has introduced a significant change regarding building on the Northern Fringe without detailed justification. No supporting documentation has been produced to say why the situation has changed in just over a year. The core strategy briefly refers to a Strategic Housing	The SHLAA updates the Ipswich Urban Capacity Study (2008) which informed the Site Allocations document. The SHLAA assesses the deliverability/developability of

		Land Availability Assessment (SLHAA) [sic]. This supporting document is only now out for consultation and appears to have repeated the process that produced the initial Site Allocations document. However, the SLHAA [sic] have significantly watered down many of the proposed sites in terms of density and availability. Why has the situation changed?	sites and identifies additional sites including those on greenfield land. A number of sites identified in the Site Allocations document and the IP-One Area Action Plan are no longer deliverable and therefore should not be considered as part of the potential housing land supply.
David Lock Associates on behalf of Mersea Homes	Object	Overall we would like to reiterate our concern that the timing and validity of the SHLAA risks to undermine the robustness and soundness of the emerging LDF. We are concerned that relevant DPDs will not have been adequately informed by the SHLAA. The SHLAA draft report, subject to this consultation, has obviously failed to comply with the guidance at least in one instance. The land west of Westerfield Road (IP181) is currently being promoted for development and a planning application for a residential-led scheme was submitted with the clear intention to deliver the scheme within the first five years. Despite this evidence, however, the site is only scheduled for development in the medium term. We strongly object to this timescale as our client has provided sufficient evidence to prove that the site can be delivered early on. Furthermore, we question that sites are being scheduled for early delivery that are neither available nor achievable for various reasons. By doing so the Authority has failed its own methodology. Having taken part in the Stakeholder Workshop we would like to highlight that the key points listed in Appendix D are only a small selection. Further important points that were raised and had	The Ipswich Urban Capacity Study (2008) informed the Preferred Options of the LDF and the SHLAA updates this study further assessing the deliverability/developability of sites, and identifying additional sites including those on greenfield land. The site needs to be considered as part of a broad location and therefore infrastructure associated within the development would mean delivery with the second five year phase of the plan period. The summary of the key points raised at the stakeholder workshop is an accurate reflection of the main issues raised at the meeting. A planning permission can lapse but this does not mean the landowner

		consensus at the meeting have been ignored. We would like to object to the inclusion of sites being deliverable in the 1 st period where planning permission has expired. Without a detailed analysis of the reasons why permission has lapsed there is a high risk to include sites that are not actually achievable or available for various reasons, thereby jeopardising the soundness of the SHLAA and subsequently the housing delivery strategy.	does not have any intention to develop the site within five years. The fact that planning permission was sought indicated a willingness to consider the site for residential development.
East of England Regional Assembly	Support	Consultation document does not raise conformity issues against policies in the East of England Plan. The strong focus on the principles of sustainable development during the site assessment and evaluation is supported.	Noted.
Environment Agency	Object	For any site that falls within Flood Zone 2 and 3, a Flood Risk Assessment (FRA) will be required accompanying any planning application. In addition a FRA will also be required for any site that is over one hectare in size. Any dwelling houses in Flood Zone 3b will be objected in principle. Houses in Flood Zone 3a may be acceptable. This is subject to the provision that the submitted FRA has demonstrated the development will be safe. Any development that falls within 9 metres from the bank of a main river or designated flood defence will require a Flood Defence Consent.	Noted. Each site in Flood Zone 2 and 3 will be subject to a Flood Risk Assessment at the time of any planning application.
GVA Grimley on behalf of Gainsborough Retail Park Limited – In Administration	Support	The SHLAA Guidance (CLG, 2007) provides the framework against which to assess the Draft SHLAA. It defines the purpose of a SHLAA which is to identify sites with potential for housing, to assess the yield of these and assess whether they are likely to be developed. It encourages local planning authorities to consider as many sites with housing potential both in and around settlements as possible. A SHLAA is also	Noted. The SHLAA has met this criteria.

		required to assess the deliverability and developability of all sites. Part of such an assessment is to identify sites with the potential for housing development based upon suitability (in terms of being in a suitable location that will contribute to the creation of sustainable, mixed communities), availability and achievability.	
Ipswich Labour Group	Object	We generally support the site allocations as amended over the past 18 months, subject to further amendments.	Noted. Site-specific comments are noted in the table below.
JB Planning Associates on behalf of Barratt Strategic	Object	The SHLAA serves to demonstrate that there is currently neither a 10 year nor 15 year supply of deliverable sites. We do not accept the SHLAA figures of around 2,000 units for IP-One and 1,400 for the rest of the Borough. Although a number of undeliverable/unsuitable sites have been removed from the SHLAA since our previous representations, the SHLAA continues to include a number of inappropriate and undeliverable sites in both the IP-One area and the remainder of the Borough. Our estimate of achievable capacity (based on our analysis of sites at the Preferred Options stage) within both areas is circa 2,500 units, which if found to be correct, reveals an even larger shortfall in the 10 year land supply. We believe that the Council's SHLAA is unrealistic. We do not believe the sites included within the Council's SHLAA are likely to deliver the volume of housing which is required, or at the rate which the Council have anticipated.	The SHLAA has been informed by discussions with agents, developers and landowners and we believe the sites identified with housing potential in the SHLAA are deliverable and developable within the plan period.
Mr Barry Reeve	Object	The final version of the core strategy, which has just been published, has introduced a significant change regarding building on the Northern Fringe without detailed justification. No supporting documentation has been produced to say why the situation has changed in just over a	The SHLAA updates the Ipswich Urban Capacity Study (2008) which informed the Site Allocations document. The SHLAA assesses the

		<p>year. The core strategy briefly refers to a Strategic Housing Land Availability Assessment (SLHAA) [sic]. This supporting document is only now out for consultation and appears to have repeated the process that produced the initial Site Allocations document. However, the SLHAA [sic] have significantly watered down many of the proposed sites in terms of density and availability. Why has the situation changed?</p>	<p>deliverability/developability of sites and identifies additional sites including those on greenfield land. A number of sites identified in the Site Allocations document and the IP-One Area Action Plan are no longer deliverable and therefore should not be considered as part of the potential housing land supply.</p>
Mrs Barbara Robinson	Object	<p>The final version of the core strategy, which has just been published, has introduced a significant change regarding building on the Northern Fringe without detailed justification. No supporting documentation has been produced to say why the situation has changed in just over a year. The core strategy briefly refers to a Strategic Housing Land Availability Assessment (SLHAA) [sic]. This supporting document is only now out for consultation and appears to have repeated the process that produced the initial Site Allocations document. However, the SLHAA [sic] have significantly watered down many of the proposed sites in terms of density and availability. Why has the situation changed?</p>	<p>The SHLAA updates the Ipswich Urban Capacity Study (2008) which informed the Site Allocations document. The SHLAA assesses the deliverability/developability of sites and identifies additional sites including those on greenfield land. A number of sites identified in the Site Allocations document and the IP-One Area Action Plan are no longer deliverable and therefore should not be considered as part of the potential housing land supply.</p>
Suffolk Primary Care Trust	Support	Support the approach taken.	Noted.
The Coal Authority	Support	No specific comments to make at this stage.	Noted.

Westerfield Parish Council	Object	<p>The final version of the core strategy, which has just been published, has introduced a significant change regarding building on the Northern Fringe without detailed justification. No supporting documentation has been produced to say why the situation has changed in just over a year. The core strategy briefly refers to a Strategic Housing Land Availability Assessment (SLHAA) [sic]. This supporting document is only now out for consultation and appears to have repeated the process that produced the initial Site Allocations document. However, the SLHAA [sic] have significantly watered down many of the proposed sites in terms of density and availability. Why has the situation changed?</p>	<p>The SHLAA updates the Ipswich Urban Capacity Study (2008) which informed the Site Allocations document. The SHLAA assesses the deliverability/developability of sites and identifies additional sites including those on greenfield land. A number of sites identified in the Site Allocations document and the IP-One Area Action Plan are no longer deliverable and therefore should not be considered as part of the potential housing land supply.</p>
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Summary of site-specific representations

Consultee	Support /Object	Site Ref.	Comments	Council response
Barton Willmore on behalf of Crest Nicholson	Object	IP001	Site should be identified as student accommodation in the SHLAA and not for market housing.	Noted and amended to student accommodation.
Barton Willmore on behalf of Crest Nicholson	Object	IP002	The site should be identified for a doctors/employment in the SHLAA.	Site is suitable for housing development if planning permission is not implemented.
Barton Willmore on behalf of Crest Nicholson	Object	IP003	The SHLAA should not identify the site for housing due to uncertainty over whether it is developable and the site should be used for employment.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Ipswich Labour Group	Object	IP003	The site should be predominantly houses, and therefore lower density than currently proposed.	The high-density is indicative and suitable in this regeneration area.
Barton Willmore on behalf of Crest Nicholson	Object	IP004	The SHLAA should not identify the site for housing due to uncertainty over whether it is developable and the site should be used for employment.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Ipswich Labour Group	Object	IP004	The site should be medium/high density housing and urge the protection of the facade of the Bus Depot, an important referent in the industrial and social history of the town.	The high-density is indicative and suitable in this regeneration area. We would want to see retention of the tram shed and façade in any

				redevelopment.
Rapleys on behalf of Associated British Foods	Support	IP005	Our client notes the preparation and publication of the SHLAA, and that this is being used as part of the evidence base for the production of the LDF. We trust that those sites identified in the SHLAA will be included in the submission draft of the Site Allocations DPD.	This study is part of an evidence base and inclusion of sites in this study does not guarantee they will be identified for development. However they will be considered in producing the submission draft of the IP-One Area Action Plan and Site Allocations DPDs.
Barton Willmore on behalf of Crest Nicholson	Object	IP005	Site is adjacent to a conservation area. The site could be an accessible and high profile employment site for a range of uses. To be allocated for housing in the five year housing supply more certainty will be required over deliverability. We understand the developer is looking at a residential scheme with community uses and playing fields (in conjunction with IP032). We therefore consider that it is likely some 100 homes will be delivered on the site 005 in the LDF period between 2010 and 2015.	Noted. Amended site sheet to read adjacent to conservation area. The site is available now and the landowner is promoting the site for a housing allocation.
Barton Willmore on behalf of Crest Nicholson	Object	IP006	SHLAA states that redevelopment for 28 homes is the preferred option. We understand that the Co-op is likely to relocate. The site must accommodate 10% open space. Note the SHLAA conclusion of 28 units.	Open space will be considered at the time of any planning application.
Barton Willmore on behalf of Crest Nicholson	Object	IP007	SHLAA states that redevelopment for 18 homes is the preferred option. Developing the site for 18 dwellings is considered unviable, as 18 dwellings will not generate sufficient funds to ensure development of the site. The SHLAA should not identify	Viability of the site would need to be assessed at the time of any planning application and there may

			the site for 18 homes.	be a need to increase the housing numbers on the site.
Barton Willmore on behalf of Crest Nicholson	Support	IP008	We support the SHLAA conclusion of open space.	No change.
Ipswich Labour Group	Support	IP008	The site should be retained for open space. This has been accepted by the administration and we call for its retention.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP009	The SHLAA states that there is capacity for 14 dwellings. The site will, in all likelihood, come forward for residential use between 2015 and 2020 given the site history.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP010a & IP010b	With the owner of the eastern part of the sites having the intention of seeking residential development on part of their land we estimate that 150 dwellings could come forward here. With the school taking up about 1 hectare of the Co-op site about 0.75 hectares will be left giving about 35 dwellings.	No change.
Ipswich Labour Group	Support	IP010a & IP010b	We feel the suggested lower density of 103 is much more appropriate for this site.	The housing numbers suggested are 185 dwellings across the two sites.
Barton Willmore on behalf of Crest Nicholson	Object	IP011a	IP011a has planning consent for 124 units of student housing. The SHLAA should not identify the site for housing.	Noted and amended to student accommodation.
Barton Willmore on behalf of Crest Nicholson	Object	IP011b	The SHLAA does not justify why there is a reasonable prospect that the site is available for housing or whether the delivery of housing this is achievable at the point envisaged. We do not see how the Council can reasonably justify that the site is likely to come forward between 2015 and 2020. The SHLAA should not identify the site for housing due to questions over whether the site is developable.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.

Barton Willmore on behalf of Crest Nicholson	Object	IP012	The SHLAA should identify the site for student accommodation and not market housing, as there is no certainty that the site will be available for market housing or that any student planning permission will allow the delivery of market housing to be achievable on the site.	Noted and amended to student accommodation.
Barton Willmore on behalf of Crest Nicholson	Object	IP013	Difficulty in accommodating Core Strategy Policy Area 22, open space requirements of 10% open space not including gardens. Student housing or low density housing would be most appropriate as high density housing would adversely affect the residential amenity and the amenity of Alexandra Park. We note the SHLAA conclusion that 5 dwellings will come forward.	Open space will be considered at the time of any planning application. The SHLAA is suggesting medium-density housing.
Barton Willmore on behalf of Crest Nicholson	Object	IP014	The residential property values in the area make development on the site between 2010 and 2015 unlikely. The SHLAA should state that 23 homes will come forward between 2015 and 2020 as the owners have stated that the site will be available and they wish to relocate.	It is anticipated that housing delivery would occur towards the end of the first five years.
Barton Willmore on behalf of Crest Nicholson	Object	IP015	The site should be retained as a car park due to the importance of its location serving the nearby council offices and railway station. We consider that to develop the site for 20% of housing will not provide an acceptable residential environment given the surrounding land uses and that the development should not include housing. The SHLAA should not allocate the site for housing and it should remain in car parking or employment uses.	The SHLAA is proposing 20% housing development as part of a larger redevelopment alongside site IP083 that could include new car parking, employment and riverside walk. The site is opposite new residential development and which is easily accessible by a footbridge.

Barton Willmore on behalf of Crest Nicholson	Support	IP016	We are pleased to see that the SHLAA now states that because of the constraints of the site that 34 dwellings are appropriate.	Noted.
William and Mileva Donachie	Object	IP016	We would like to express our concern at the proposal to build 34 homes on the site of the Funeral Directors, Suffolk Road. This space seems far too small for such a number of dwellings – especially if they are primarily going to be more than one bedroom. We were under the impression that the trees on this site were protected and are concerned that they may well be cut down or severely cut back. The amount of slope and the changing levels of the land are significant and we wonder how stable the land is. In addition, we are particularly concerned about vehicular access to and from the site for 34 homes, which could easily mean 64 cars. Suffolk Road is already very congested, as people living there clearly have to park their own vehicles on the road. This means there is room for only one car to pass up or down the street. The same is true for Hervey Street. On many occasions we have had to reverse quite long distances to allow a vehicle to pass, as due to the hill and the bend, it is not possible to see if the single lane available is clear to the top of the road. The proposed housing will severely compromise quality of life for people living on Suffolk Road and Hervey Street to an unacceptable degree.	There are tree preservation orders on the site. The slope is identified as a constraint along with access. Any planning application would need to consider traffic generation.
Barton Willmore on behalf of Crest Nicholson	Support	IP017	The site could come forward for development, given the surrounding land use and that for a builder's yard it is relatively poorly located, however the Council identifies that the multiple ownerships on the site will delay delivery and have not identified when the site will come forward. We there consider that no housing should be forecast from the site due to the uncertainty of delivery.	The SHLAA does not include any housing in its appraisal on this site but does make a suggestion of housing should the site be deliverable as the site is suitable for housing.

Barton Willmore on behalf of Crest Nicholson	Object	IP018	The site should be retained in its current use and should not be allocated for housing due to uncertainty over the delivery of the site that first requires the existing business to relocate. The importance of such established business uses in providing a sustainable settlement and the difficulty of accurately forecasting the redevelopment of the site should be recognised. We do not consider that the SHLAA adequately justifies that there is a reasonable prospect of the site coming forward for housing between 2015 and 2020 when it has been in commercial uses for over 35 years and when there are multiple occupiers on the site. Recommend SHLAA conclusion: Employment.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP019	We note the SHLAA conclusion that the site will deliver no housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP020a	The SHLAA should recognise that the site could only deliver 6 dwellings (IP020a).	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP020b	There needs to be clarity over the need to retain the water infrastructure on the northern part of the site before the land is deemed available for housing development. The SHLAA should recognise that the site could only deliver 6 dwellings (IP020a).	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP021	The site has an implemented planning permission for 5 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP022	We note the SHLAA conclusion that the site has an implemented planning permission for 6 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP023	Retain as a fire station. The site should not be allocated in the LDF for redevelopment due to the uncertainty over delivery of alternative uses on the site. We support the SHLAA conclusion that the site should not be allocated for housing.	No change.

Barton Willmore on behalf of Crest Nicholson	Support	IP024	We support the SHLAA conclusion that the site should not be allocated for housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP025	We note the SHLAA conclusion that the site has an implemented planning permission for 7 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP026	We note the SHLAA conclusion that the site should not be allocated for housing and is currently in use and gypsy and traveller accommodation.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP027	We note the SHLAA conclusion that the site is suitable for housing however the poor access is a significant constraint.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP028a	The SHLAA should identify the site for 14 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP028b	Should the existing use relocate the most appropriate occupier would be for retention as employment or redevelopment for leisure. Residential use would be at risk of flooding and an allocation should not be made until the necessary work has been undertaken to show that the site can be delivered. The SHLAA should not identify the site for housing as there is not a reasonable prospect that the delivery of housing is achievable or that the site is available.	20% of the site is suggested for residential development and the site opposite is recent residential development.
Barton Willmore on behalf of Crest Nicholson	Object	IP029	The Council's SHLAA does not justify why there is a reasonable prospect that the development of 50% of the site for housing will happen between 2015 and 2020. The site is most suitable for retention as employment due to the adverse impact that the A14 would have on the living conditions of occupiers of the residential properties. Recommend SHLAA conclusion: Employment use.	The site is in the ownership of the Borough Council and following adoption of the LDF, we believe the site may come forward for housing.
Barton Willmore on behalf of Crest Nicholson	Support	IP030	Development of greenfield land in the Borough should take place in a comprehensive manner and should not include relatively small sites such as this on their own. We support the	No change.

			SHLAA conclusion that the site should not be allocated for housing.	
Barton Willmore on behalf of Crest Nicholson	Support	IP031	Possible 70 homes could come forward on the vacant Co-op part of the site. The delivery of the site for residential use is uncertain due to the willingness of landowners and flood risk. The SHLAA should not identify the site for housing and there is not a reasonable prospect that the site will be available for housing.	The SHLAA acknowledges that redevelopment of the remainder of the site would be dependent upon the relocation of existing businesses and the 81 homes suggested is an indicative capacity. The likely delivery timescale is 6-10 years from adoption of the plan.
Ipswich Labour Group	Object	IP031	Given the character of housing in this location [2- to 4-storey terraces, generally] the density should be medium. We should be looking for houses and not high-density apartments, which would be completely out of place in this location.	The site occupies a prominent waterside position and high-density can mean 4-storey.
Barton Willmore on behalf of Crest Nicholson	Object	IP032	Site is adjacent to a conservation area. The site could be an accessible and high profile employment site for a range of uses. To be allocated for housing in the five year housing supply more certainty will be required over deliverability. We understand the developer is looking at a residential scheme with community uses and playing fields (in conjunction with IP005). We therefore consider that it is likely some 62 homes will be delivered on the site 032 in the LDF period between 2010 and 2015.	No change.
Ipswich Labour Group	Object	IP032	We continue to oppose the use of this site for housing. This prominent site at the western entrance to the town should be	The landowner is promoting residential

			retained wholly as open space.	development.
Barton Willmore on behalf of Crest Nicholson	Object	IP033	Residential development is likely as the site is available and deliverable with a developer promoting the land, and is likely to be developed at greater housing numbers than proposed by the Council given the precedent of recent neighbouring development. Recommend SHLAA conclusion 125 dwellings.	There is a need for a large area of open space in this area of the town.
Ipswich Labour Group	Object	IP033	The new proposal raises the proportion of land for housing from 20% as originally proposed to 50%. This is in an area classified in the 1997 Local Plan as 'deficient in open space'. The proportion should therefore remain 20% housing maximum.	The landowner is proposing a much higher proportion than 50%.
Barton Willmore on behalf of Crest Nicholson	Support	IP034	We support the SHLAA conclusion that the site should not be developed for housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP035	We support the SHLAA conclusion that the site should not be allocated for housing due to the mixed use planning consent on the site.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP036a	The site has been purchased by the University College [sic] Suffolk and is proposed by them to be developed for a range of uses including education, student accommodation and housing. There is an objection from the Environment Agency against high-density housing.	Noted and amended to student accommodation.
Barton Willmore on behalf of Crest Nicholson	Object	IP036b	The site has been purchased by the University College [sic] Suffolk and is proposed by them to be developed for a range of uses including education, student accommodation and housing. There is an objection from the Environment Agency against high-density housing.	The site is available for development and we believe that market housing may be developed in years 6-10.
Associated British Ports, owner and operator of the Port of Ipswich	Object	IP037	We find the indicative capacity disappointing and, in our opinion, insufficient to allow the economic delivery of the site within the plan period for the alternative use. The site area is	Viability of the site would need to be assessed at the time of any planning

			stated as 6.02 hectares, and its indicative capacity as 331 homes.	application.
Barton Willmore on behalf of Crest Nicholson	Object	IP037	The need to provide a second access to the site to enable delivery for housing is a major practical and financial constraint to development on the site. The viability of residential development is questionable; the site holds significant value to the owners, the development constraints, and the requirement for 40% affordable housing will make it unlikely that development will come forward. Recommend SHLAA conclusion: employment application.	The landowner believes residential development is suitable on the site, and at a greater number than suggested in the SHLAA.
Environment Agency	Object	IP037	We have concerns regarding the suitability of housing at this location. At present the island site is lower than surrounding land on the opposite bank. Therefore in a flood event this would be one of the first places to experience flooding. This will continue to be the situation after the Ipswich Tidal Barrier scheme has been implemented. The scheme has been designed so part of the Island site will pass flood water into the wet dock, used as a storage area in a flood event. Any development on the Island site will have to carefully and concisely look at the effect of off-site flooding in a town-wide basis. Safe access/egress away from the development may be a major issue. We are not saying that housing is unachievable at this location, but demonstrating that the site will be safe may be a major obstacle to overcome.	Flood risk would have to be addressed at the time of any planning application for development.
Ipswich Labour Group	Object	IP037	We are very strongly opposed to the allocation of the Island site for yet more apartment blocks: the views of the newly regenerated Waterfront will be immeasurably damaged by high-rise buildings in this important location. We maintain our view that the majority of this site should be allocated for leisure/open	High-density housing will be necessary to ensure the viability of any residential development.

			space, with a maximum of 20% for housing.	
Barton Willmore on behalf of Crest Nicholson	Support	IP038	Due to the recent planning approval we consider that the site is likely to come forward for 351 dwellings as set out in the SHLAA as the main occupiers are expected to leave shortly.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP039	Given the allocation for mixed use development in 2001 the viability of the development must be questionable. The flood risk will be a further significant development constraint and the employment is valuable to meet the RSS employment targets. We do not consider that there is sufficient value in residential development on the site to develop it between 2010 and 2015. Recommend SHLAA conclusion employment use.	Given the changing nature of the area surrounding the site, we believe that a residential led mixed use scheme can be delivered towards the end of the first five years from adoption of the plan.
Barton Willmore on behalf of Crest Nicholson	Support	IP040	Development on the site is considered likely to be delivered in the next five years. Support SHLAA conclusion of 11 units.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP041	We do not consider that the Police Station can be allocated due to the uncertainty over the relocation. The SHLAA identifies potential for a mixed housing/employment scheme (with 29 new homes). The SHLAA conclusion should be that there is not a reasonable prospect that the site will be available for housing.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP042	We support the SHLAA conclusion that the site is not suitable for housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP043	The SHLAA does not make it clear why the development of 105 or fewer units on the site will be viable and why the site is available and suitable to deliver housing and that this is achievable. The SHLAA conclusion should be that there is not a reasonable prospect that the site will be available for housing.	The landowner is seeking redevelopment on this site and therefore we believe housing can be delivered within five years from adoption of the plan.
Barton Willmore on behalf of Crest Nicholson	Object	IP044	The viability of a residential scheme should be investigated by the Council as it may not be viable for housing to form part of	The SHLAA is suggesting 20% of the

			the redevelopment. Since the site is in flood zone 3, we consider that it should be retained as an existing car park or developed for employment. Recommend SHLAA conclusion that there is not a reasonable prospect that the site is available for housing.	site for housing as part of a mixed use development.
Barton Willmore on behalf of Crest Nicholson	Object	IP045	Due to the value of employment uses on the site residential development may not be viable within the plan period. In view of the employment targets set out in RSS14, the sustainable location of this employment site and the fact that it is operating very successfully as evidenced by the occupancy rate, the site should be retained in its existing use. Evidence of recent lettings for 10 years would mean that if allocated for redevelopment in the LDF delivery of the redevelopment could not be forecast with enough certainty to be sure that the site would be delivered. Due to the age of the buildings, redevelopment is unlikely to be viable and residential in this location will be constrained given the flood risk. Recommend SHLAA conclusion that the site is not available for housing.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP046	Support SHLAA conclusion that the site is not available for residential development.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP047	The location within the flood plain makes the site difficult to develop for housing as a safe access will be required. If the flooding issues can be overcome the site is in an appropriate location for commercial and retail uses. Recommend SHLAA conclusion employment use.	The SHLAA is suggesting 20% of the site for housing as part of a mixed use development. A planning application is pending for a retail-led scheme with residential.

Ipswich Society	Object	IP047	Though we accept that this site is suitable for housing development, we think that it would be more appropriately utilised for class A office development either in multiple use or for one large company. This would fit with the constraints and would be deliverable.	The SHLAA assesses housing potential and a planning application is pending for a retail-led scheme with residential.
Barton Willmore on behalf of Crest Nicholson	Object	IP048	The Council's SHLAA does not justify why there is a reasonable prospect that the development of 20% of site for housing will happen between 2015 and 2020. The redevelopment of this land has been talked about for 30 years, what reasonable likelihood is there is little to provide confidence that the site will come forward in the next 10 years. Due to the uncertainty of housing delivery on the site due to multiple landownership's the site is not allocated for housing in the LDF. Recommend SHLAA conclusion that housing will not be delivered on the site between 2015 and 2020.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Christ Church	Object	IP048	The boundary of the Mint Quarter should be adjusted to exclude the graveyard, school room block and church house, all of which form part of the curtilage of the church and are fully used in the operation of this busy church.	Site boundary has been amended, and indicative capacity has been reduced to 64 homes.
Ipswich Labour Group	Support	IP048	Given the history of this site, we cannot see that housing will be 'deliverable' on this site before 2015.	Noted.
Barton Willmore on behalf of Crest Nicholson	Object	IP049	Residential location in this location is contrary to current flood policy. Flooding issues may be able to be overcome on this site with the provision of safe access and the tidal barrier, however delivery is not certain. Recommend SHLAA conclusion that the site not be allocated for housing due to uncertainty over the delivery.	A planning application has been received for a mixed-use development including 200 residential dwellings. The Applicant believes if planning permission is granted that development could be

				built within five years. Indicative capacity changed to reflect current market aspirations.
Barton Willmore on behalf of Crest Nicholson	Object	IP050	There are clear constraints to the development of housing on this site, namely flooding, and we consider that these issues should be overcome before the site is identified for development. Recommend SHLAA conclusion employment and boat park.	The SHLAA is suggesting housing as part of a mixed use development in years 6-10 from adoption of the plan and after the flood defence barrier is scheduled for implementation.
Barton Willmore on behalf of Crest Nicholson	Object	IP051	Most appropriate development option is a mixed use development, principally of leisure and sports related uses to build on the attraction of the football ground. This could contain an element of housing if the serious flood risk issues can be overcome. Given the significant flood risk there is considerable uncertainty over the deliverability of housing on this site. A small housing development on 20% of the site is likely to be of poor quality as it will not relate well to existing housing and will be surrounded by employment and leisure uses. Preferred SHLAA conclusion mixed leisure and employment development.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Object	IP052	The site has planning permission for 397 student homes. The SHLAA states that this is equivalent to 132 dwellings but does not set out why this is the case. Recommend SHLAA conclusion: student housing.	Noted and amended to student accommodation.

Barton Willmore on behalf of Crest Nicholson	Support	IP053	Support SHLAA conclusion that the site is unavailable and not viable for housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP054	The site is in multiple ownerships and contains several important employment sites however some including the Daily Times print works could be available, so part of the site could come forward for development. A number of landowners have made representations in the preferred options on this land promoting land for residential development. There is a likelihood that some development will come forward on this site outside flood zone 3, particularly to the north of the site. Support the SHLAA conclusion that 94 homes can come forward between 2010 and 2015.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP055	The site comprises a swimming pool complex and the town's main multi storey car park. Both are important town centre facilities in sustainable locations close to the bus station. Redeveloping the site would require their replacement elsewhere and no site has been identified for the relocation, making the proposal to develop the site questionable in terms of viability and delivery. We would question the prospects of the swimming pool being redeveloped as it is currently being refurbished. The offices are predominantly let and in good condition.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP056	We note the SHLAA conclusion that the site is unavailable for development for housing.	The Council states that the site is not suitable for housing development.
Barton Willmore on behalf of Crest Nicholson	Support	IP057	We note the SHLAA conclusion that as the site has planning permission for office development it is not available for housing.	No change.
Anglian Water	Object	IP058	Would expect this site to be listed under 'Sites not Suitable for Housing Development' as it is within the 400 metre cordon sanitaire of a Sewage Treatment Works.	This view needs to be balanced against the need for housing and an

				individual planning application should be determined on its own merits.
Barton Willmore on behalf of Crest Nicholson	Support	IP058	The site has a number of serious constraints to development, the nearby sewerage works will constrain housing development and the County Wildlife site designation could constrain any type of development. The fact that the site has not been developed for housing and has no recent planning history raises questions over its delivery, and the Council must be certain about the landownership position and the constraints to delivery that this imposes before allocating the site. Given that the site has been vacant for a considerable period promoting the site for a mix of uses will give the best chance of development taking place. Support SHLAA conclusion that 102 homes will be delivered between 2015 and 2020.	A County Wildlife site in the form of bee orchids exists and the site sheet has been amended to reflect this. SHLAA suggests 50% low-density housing on the site.
GVA Grimley on behalf of Gainsborough Retail Park Limited – In Administration	Object	IP058	We welcome that the Draft SHLAA has identified that a mix of uses, including employment and housing, would be suitable for this site. The site is well located for housing. It is also both ‘deliverable’ and ‘developable’ in accordance with the objectives and criteria of PPS3. We therefore think this site is suitable for both short and medium term allocation, rather than just the period suggested by the Draft SHLAA of “6-10 years from adoption of the plan”. The site allocation should be for a flexible, mixed use designation, to include employment uses and housing in proportions dependent upon viability, deliverable in the short to medium term.	The suggested option of 50% low-density housing is an indicative one. If the site comes forward for development prior to 2015 it would be welcomed by the Council, however the Council cannot be certain at this time this will be the case.
Barton Willmore on behalf of Crest Nicholson	Support	IP059	We note the SHLAA conclusion that the planning application will deliver housing and the efforts of owners to gain planning	No change.

			consent for housing over a period of time. We note the SHLAA conclusion that 130 homes will be provided between 2009 and 2014.	
Barton Willmore on behalf of Crest Nicholson	Support	IP060	We note the SHLAA conclusion that the site is in use and [sic] a business centre and is not available for housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP061	We note the SHLAA conclusion that the site is required for a school.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP062	We note the SHLAA conclusion that the site is not available for housing.	No change.
Ipswich Labour Group	Support	IP062	No part of this site should be allocated for housing but retained as allotments for the long-term benefit of local residents. It should be transferred to the 'Not deliverable' category. This has been accepted by the administration and we call for its retention.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP063	We note the SHLAA conclusion that the site is not available for housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP064	The SHLAA seeks redevelopment for 52 dwellings. However, the site is an existing industrial estate and has employment uses to the west and open space to the east. The industrial estate is largely occupied, is in multiple ownerships and occupation and is viable. As such, redevelopment is unnecessary and unviable, and any development for housing would be inappropriate in the flood plain. The relocation of many of the existing uses to allow residential development is unlikely to be viable. Recommend SHLAA conclusion: retain for employment use.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Object	IP065	The site has been cleared of the former club building and the sports ground has fallen out of use. Nevertheless, Sport England has objected to the redevelopment of the site, without adequate replacement facilities elsewhere. Until a clear indication that the site is surplus to requirements delivery is uncertain and it is	The Council is the landowner and supports the suggestion of housing on the site.

			unlikely that a redevelopment application will proceed without the relocation of the sports facilities elsewhere. Recommend SHLAA conclusion community uses/ open space.	
Ipswich Labour Group	Support	IP065	We would like to see a mix of housing and community use on this site, and therefore propose a lower number of dwellings here. This has been accepted by the administration and we call for its retention.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP066	The proposed housing numbers are unviable to develop the site. The only access is currently from White Elm Street, through the industrial estate Bishops Hill being above the level of the main part of the site. This site forms an integral part of the employment area and redevelopment for residential use would create conflict with adjoining employment uses. Recommend SHLAA conclusion, retain employment use.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Anglian Water	Object	IP067	Would expect this site to be listed under 'Sites not Suitable for Housing Development' as it is within the 400 metre cordon sanitaire of a Sewage Treatment Works.	This view needs to be balanced against the need for housing and an individual planning application should be determined on its own merits.
Barton Willmore on behalf of Crest Nicholson	Support	IP067	A small housing development near to Pipers Vale would be appropriate. The landowner British Energy is promoting this. Note SHLAA conclusion of 37 dwellings between 2015 and 2020.	No change.
Gerald Eve LLP on behalf of British Energy PLC	Object	IP067	The previous allocation was for 50% of the site to be allocated for housing and 50% for employment use, with an indicative	Anglian Water object to housing development

			<p>capacity of 92 homes to be built at low density. The current allocation now identifies 20% of the site for housing and an indicative capacity for 37 homes to be built at low density. There has been no material change in circumstances following the previous document of November 2007 and it is unclear why the suggested option has changed to now only allocate 20% of the site for housing. The revised allocation states that the deliverability of housing on the site is not achievable. Given the site is in single ownership these delivery concerns are not justified and it is clear that a significant level of both housing and employment could be delivered. The summary states that housing would need to be located to the north of the site furthest away from the sewage works which was an identified constraint. This concern can be overcome by an agreement to carry out opfalmetric testing on the site to assess the impact of the odour from the sewage works and confirm that other areas of the site are appropriate for housing.</p>	<p>within 400 metres of the sewage works and therefore to mitigate the impact of the sewage works, we believe a lower proportion of the site is suitable. The SHLAA does not allocate the site for housing and is an evidence base study.</p>
Barton Willmore on behalf of Crest Nicholson	Object	IP068	<p>Although the site benefits from extant planning permission for residential uses, the deliverability is questionable since the scheme has not been developed in the past four years and the current planning permission will lapse in 2009. The present commercial use has reached a level that exceeds the residential value of the site. The site is at risk from flooding and will require a new safe access requiring strategic bund to deliver residential uses on the site raising questions over viability and deliverability. Part of site may be required for wet dock crossing. As such, we do not consider that this site should be allocated for housing and the existing use should be retained. The site is in a poor residential location and the most likely scenario is the continuation of the existing use or student</p>	<p>The site was granted outline planning permission and is located in area of change in the town. The site is current vacant.</p>

			accommodation. Recommended SHLAA conclusion there is not a reasonable prospect that the site is available for housing or could be developed at the point envisaged.	
Barton Willmore on behalf of Crest Nicholson	Support	IP069	We note the SHLAA conclusion that this site is not available for housing.	No change.
Ipswich Labour Group	Support	IP069	We oppose the allocation of the site for yet more apartments. It is uniquely placed as a community facility, being the only town centre community space of its size in the town centre. It is our strong view that it should either be re-designated as 'Not deliverable' [and its continued community use confirmed] or not designated for high-density housing until an equivalent community facility has been allocated in the town centre as its replacement. This has been accepted by the administration and we call for its retention.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP070	We note the SHLAA conclusion that the site is not appropriate for residential uses.	No change.
Anglian Water	Object	IP072	Would expect this site to be listed under 'Sites not Suitable for Housing Development' as it is within the 400 metre cordon sanitaire of a Sewage Treatment Works.	This view needs to be balanced against the need for housing and an individual planning application should be determined on its own merits.
Barton Willmore on behalf of Crest Nicholson	Object	IP072	A small housing development has recently been built to the west of the site, at Pipers Vale Close and fronting Sandyhill Lane. However, development of uses other than employment uses at this site would mean a loss of employment land. Recommend SHLAA conclusion retain for employment use.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.

GVA Grimley on behalf of Gainsborough Retail Park Limited – In Administration	Object	IP072	The site allocation should be for a flexible, mixed use designation, to include employment uses and housing in proportions dependent upon viability. The SHLAA should expressly seek to optimise development density on all sites, to make the 'best use of land', subject to design quality, mitigation of environmental impacts and infrastructure capacity.	The SHLAA looks at the housing potential and the site allocation would need to be considered through production of the Site Allocations DPD. Low-density housing is appropriate in this area of the town.
Barton Willmore on behalf of Crest Nicholson	Object	IP073	If the site were to be redeveloped, it would be most suited to a low density residential uses. A medium density scheme in this location would be inappropriate as it could lead to overlooking and loss of privacy for the existing residential properties. Recommend SHLAA conclusion low density housing for 48 dwellings.	The Council believes medium-density housing is appropriate on this site at 45 dwellings per hectare.
Barton Willmore on behalf of Crest Nicholson	Support	IP074	Note the SHLAA conclusion that the site has planning permission for 18 dwellings that could commence within 5 years.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP075	We note the SHLAA conclusion that the site is not deliverable for housing.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP076	We support the SHLAA conclusion that the site is not suitable for residential uses due to a poor environment including noise constraints.	Site is suitable for residential but not available.
Ipswich Labour Group	Object	IP076	We question whether this site is suitable for 50% medium density housing: there are serious access, traffic, and air quality issues on this site. We feel public open space is more appropriate, and support an imaginative plan for an Environment Centre, with premises for an education facility, a boating/canoe centre, and low-density affordable housing. This assessment has	Site is suitable for residential but not available.

			been largely accepted by the administration, but we feel it is a site capable of use as 'Recreation/Open Space', as described above. Depending on access arrangements and careful design, we feel it is also possible for a small part of the site to be available for affordable housing.	
Associated British Ports, owner and operator of the Port of Ipswich	Object	IP077	We were very disappointed to note that site IP077 - Drunken Docker area was considered a site not suitable for Housing Development. We would further question this given its location at the head of the Wet Dock, by the lock gates and adjacent to the proposed redevelopment of the existing Anglo Norden site.	The site has now been divided into two and would need to be reassessed in a future edition of the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP077	We note the SHLAA conclusion that this site is not suitable for residential use as it is more suitable for other uses and due to constraints on the site.	Part of the site may be suitable for residential but this would have to be assessed in a future edition of the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP078	We note the SHLAA conclusion that this site is more suitable for non residential uses.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP079	We note the SHLAA conclusion that this site is more suitable for non residential uses.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP080	Housing for 26 dwellings if 10% open space can be provided on site.	Open space will be considered at the time of any planning application.
Barton Willmore on behalf of Crest Nicholson	Object	IP081	The Councils comments are confusing as to whether the site is available for housing or whether this is achievable. We do not see how the Council can reasonably justify that the site is likely to come forward between 2015 and 2020. The SHLAA should not identify the site for housing due to uncertainty over whether it is developable	The Council has spoken with the landowner who supports the suggestion of high-density housing in the future on this site.

Barton Willmore on behalf of Crest Nicholson	Support	IP082	We note the SHLAA conclusion that this site is more suitable for non residential uses.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP083	The site is in flood zone 3 so development will be very difficult for housing due to the need for safe access and development for other uses may well be uneconomic due to the increased costs to mitigate the flood risk. The Councils SHLAA does not justify why there is a reasonable prospect that the development of the site along with the site to the south for mixed use development is achievable at the point envisaged. We do not see how the Council can reasonably justify that the site is likely to come forward between 2015 and 2020. The SHLAA should not allocate the site for housing and it should remain for employment uses.	The SHLAA is proposing 20% housing development as part of a larger redevelopment alongside site IP015 that could include new car parking and employment. The site is opposite new residential development and which is easily accessible by a footbridge.
Barton Willmore on behalf of Crest Nicholson	Support	IP084	We note the SHLAA conclusion that the site has planning permission for 79 dwellings that will be delivered in 5 years.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP085	We note the SHLAA conclusion of 14 dwellings on this site.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP086	We support the SHLAA conclusion that this site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP087	We note the SHLAA conclusion that this site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP088	We note the SHLAA conclusion that this site has planning permission for 16 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP089	The site is in multiple ownerships and is used for parking. Despite being allocated for housing in 2001, no applications have come forward for a comprehensive residential proposal, suggesting that there may be ownership constraints preventing such development. The Co-op site could however deliver 34	No change.

			<p>dwellings. The remaining land is valuable car parking for nearby businesses so is unlikely to come forward. We support the SHLAA conclusion for 34 dwellings.</p>	
Barton Willmore on behalf of Crest Nicholson	Support	IP090	<p>We note the SHLAA conclusion that this site has planning permission for 142 dwellings.</p>	<p>Move to years 6-10 following correspondence with planning agent for the site.</p>
Barton Willmore on behalf of Crest Nicholson	Support	IP091	<p>We note the SHLAA conclusion that this site has development underway for 36 dwellings.</p>	<p>No change.</p>
Barton Willmore on behalf of Crest Nicholson	Support	IP092	<p>We note the SHLAA conclusion that this site is more suitable for non residential uses.</p>	<p>No change.</p>
Barton Willmore on behalf of Crest Nicholson	Support	IP093	<p>We note the SHLAA conclusion that this site is more suitable for non residential uses and has planning permission for a care home.</p>	<p>No change. Site is suitable for housing but not deliverable.</p>
Barton Willmore on behalf of Crest Nicholson	Support	IP094	<p>We note the SHLAA conclusion that the landowner prefers a non residential use.</p>	<p>No change.</p>
Barton Willmore on behalf of Crest Nicholson	Support	IP095	<p>Since this site is currently occupied by an existing dwelling, we consider that it is unsuitable for allocation since it is not available now, and the presence of mature trees on the site would make any development difficult to achieve. We support the SHLAA recommendation that the site is not suitable for housing.</p>	<p>No change. Site is suitable for housing but not deliverable.</p>
Mr Ray Atkinson	Support	IP095	<p>Further to previous correspondence indicating considerable dissatisfaction with the consultation process in relation to a particular site allocation (viz. UC106 - Morpeth House 97-99 Lacey Street), I would like to congratulate the Council on the thoroughness of subsequent deliberations and documentation. I am especially pleased to note the explicit acceptance of the need to protect assets such as green corridors (even if not publicly</p>	<p>No change.</p>

			accessible - Policies Area 21 - p.259), the extra concerns for the protection of trees and hedgerows (DC10 - mentioned in App.5 - p.222), and that a number of sites including gardens are now confirmed as "not deliverable" and will not be carried forward into the final submission document (including site UC106-App.9 Chap.7 Table 1 p.283 refers).	
Barton Willmore on behalf of Crest Nicholson	Object	IP096	The site is within flood zone three, and therefore would need to be subject to a Strategic Flood Risk Assessment and the sequential approach should be applied. Therefore, we consider that the best use for this site is most likely to be retention for employment uses, with the adjoining site 002. Recommend SHLAA conclusion: employment.	No change. The site has temporary planning consent for a car park and the site is suitable for housing.
Barton Willmore on behalf of Crest Nicholson	Object	IP097	This is the principle telephone exchange for the town as such complex infrastructure is routed to it. Millions of pounds of infrastructure will be on site both above and below ground. Therefore it is highly unlikely to be available for development. Since this site is in use and has high value infrastructure associated with it, we consider that it would be inappropriate for allocation as housing, as the site is neither available nor realistically achievable or viable. Recommend SHLAA conclusion: No change from present use.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Object	IP098	The site is within flood zone three, and therefore would need to be subject to a Strategic Flood Risk Assessment and the sequential approach should be applied. Therefore, we consider that the best use for this site is most likely to be retention for employment uses. Recommend SHLAA conclusion employment use.	Landowner is seeking a residential allocation.
Firstplan on behalf of National Grid Property	Object	IP098	In calculating the indicative capacity of 63 homes on the site based on a density of 110dph the SHLAA has not included the	The 71 homes would only be applicable if the

Holdings Ltd			new full site area which equates to 0.64 ha. Rather it has been incorrectly based on the smaller previous site area of 0.57 ha. The calculation should be corrected to reflect the increased site area - which would equate to 71 homes. It is noted that in the "Constraints" section of the Site Sheet in addition to the indication that the site is within or close to an Air Quality Management Area is contaminated and is within a Flood Zone, indicates that there are other constraints. However, these constraints are not specified. As per the submissions made previously on behalf of NGPH, the identified constraints of the site can be appropriately dealt with and it is helpful that the "Summary" section of the document indicates that there are reasonable prospects these can be overcome.	existing five dwellings were demolished. Therefore for the purposes of the SHLAA we will acknowledge the option of 63 homes with the five dwellings present until more firm plans are submitted.
Ipswich Labour Group	Object	IP098	We question whether this is now deliverable, given a recent refusal on safety grounds of an application for housing on an adjacent site.	The agent for the landowner believes the site is deliverable within five years.
GVA Grimley on behalf of Gainsborough Retail Park Limited – In Administration	Object	IP099	The Draft SHLAA notes that this site is not suitable for housing due to the proximity of the sewage works. If the adverse affects to residential amenity caused by the sewage works could be mitigated against, then the land would be suitable for housing on the same basis as set out in the response to the adjacent site (IP058) which is also part of the former Volvo site.	No change. Site is too close to the sewage works for residential development.
Barton Willmore on behalf of Crest Nicholson	Support	IP100	Since the site is in existing residential use and is in multiple ownership, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably achievable in the long term. Support SHLAA conclusion that the site is not available for housing.	No change.

Barton Willmore on behalf of Crest Nicholson	Object	IP101	This site has severe access constraints and is mostly in use as shared amenity space for the surrounding residential properties. Since this site is in existing residential amenity use and may be in multiple ownership, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably achievable in the long term. Recommend SHLAA conclusion, the site is not developable.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP102	Since the site is in existing residential use and is in a considerable number of ownerships, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably achievable in the long term. Support SHLAA conclusion that the site is not developable.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP103	We support the SHLAA conclusion that the site is not developable.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP104	This site is let at a good rent to a good covenant. There is not the slightest prospect that the indicative capacity of 15 homes would produce a value anywhere near existing so the allocation is not viable. Recommend SHLAA conclusion, the site is not developable.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Object	IP105	The site is a poor quality depot however it is in flood zone 3 so delivery of medium density housing is difficult and may not be viable. It would be necessary to demonstrate that the allocation of the site would comply with a Sequential Flood Risk Assessment, including the Sequential Approach to site selection. Recommend SHLAA conclusion, the site is not developable.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP106	The site has previously been subject to an application for redevelopment for housing, which was refused by the Council on access and flooding grounds. The surrounding land has had planning permission granted for residential development,	No change.

			therefore, the earlier access and flooding issues would need to be overcome if development were to follow precedent in this location and proceed. We support the SHLAA conclusion, the site is not developable.	
Barton Willmore on behalf of Crest Nicholson	Support	IP107	Since this site is in multiple ownership, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably achievable in the long term.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP108	The site is currently in commercial/employment use with no indication that the occupier intends to relocate or that the site will become available. The site is effectively at two levels so redevelopment to accommodate 7 dwellings would be difficult. Recommend SHLAA conclusion, the site is not developable.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Patricia Chittick	Object	IP108	Vermont Crescent is an unmade up road and already not in good condition. I would say that if any further houses are built which would need to use the Crescent as a result of their position this would make the road unsafe. The Crescent is a private road and the up keep the responsibility of the residents. Should further houses be built which might need to use the road for access, as I said above the road might become unsafe and also unpassable even by the emergency services.	This would be considered at the time of any planning application.
Barton Willmore on behalf of Crest Nicholson	Support	IP109	Since this site already has planning permission, we consider that the capacity for this site should be based on the existing proposals. We note the SHLAA conclusion of 13 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP110	Residential development is a possibility, however, the site appears to be in at least two different ownerships, and comprises the house and garden of one property, and the garden of an	No change.

			adjacent property. Therefore, any development brought forward on this site would require the loss of a large family property. We support the SHLAA conclusion that the site is not developable.	
Barton Willmore on behalf of Crest Nicholson	Support	IP111	Since this site is in use as a bowling club, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably deliverable in the long term. We support the SHLAA conclusion, the site is not developable.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP112	This site is occupied by the Plumb Centre and a carpet shop which have occupied the site for the last 4 years. The two sites are therefore very valuable in commercial uses and it is unlikely that residential value will make development viable, making the availability and deliverability of the site questionable. Recommend SHLAA conclusion, the site is not developable.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP113	The SHLAA suggests a mix of uses including 3 homes. Note the SHLAA conclusion of 3 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP114	Since this site is in multiple ownership, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably achievable in the long term. We support the SHLAA conclusion that the site is not developable.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP115	There are serious issues over the delivery of the site due to multiple uses and access the site should not therefore be allocated. We support the SHLAA conclusion that the site is not developable.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP116	We note the SHLAA conclusion that the site can deliver 350 homes between 2010 and 2015.	No change.
Environment Agency	Object	IP116	The constraints listing for site IP116 states 'No' against 'Wildlife site or adjacent to', which is incorrect. The constraints table for	Noted and changed.

			<p>this site overlooks earlier comments from Suffolk Wildlife Trust which stated that the adjacent St Clement's Golf Course is a Local Wildlife Site in Ipswich Wildlife Audit 2000, identified as suitable for a variety of birds and invertebrates. The site contributes to local biodiversity. Contains a mixture of oak woodland and grassland, and proximity to the railway line means it is part of a wildlife corridor. The scale and density of the proposed development at this site could have harmful impacts through disturbance to the habitats and species present at this wildlife site. This aspect has been overlooked.</p>	
Ipswich Labour Group	Object	IP116	<p>We support the reduction in housing numbers on this site. We are pleased that the numbers are reduced to 350 but our preferred option is for 300.</p>	No change.
Kevin and Ann Matthews	Object	IP116	<p>The site has been split into two for the purposes of the development framework plan. Whilst this may suit the planning process, it nevertheless undermines a key aspect of the site appraisal. As a combined site, the area of St Clements exceeds that of Christchurch Park and also of Holywells Park. It is disappointing that the site is ear-marked for early development. In our view, important sites should only be considered when less important options are exhausted. There are demands in the overall planning process that rightly consider provision of sites that promote good health and sport. Development of St Clements is at odds with these aspirations. The site is currently in use for sports and could easily be adapted to further health and sport provision e.g. woodland walks, provision of a children's play area. Although the site is classified as a brown site, the site is predominantly a mix of green field and woodland. There are a considerable number of buildings of dubious</p>	<p>It is intended that the golf course site is kept as open space. The St Clement's Hospital Grounds site offers the opportunity to deliver family housing in the town.</p>

			condition that could be easy removed to facilitate the creation of an important Park area.	
Lawson Planning Partnership on behalf of Suffolk Mental Health Partnership NHS Trust	Object	IP116	The Trust welcomes the recognition of the St Clement's Hospital Site as having the potential to accommodate 350 homes. However, the Trust objects to the misrepresentation of the site with regard to the site boundary. The plan for the St Clement's site within the current SHLAA does not accurately reflect the development potential of the site. Areas that need to be retained for health care are shown as part of the land for redevelopment and vice versa.	The site boundary has been amended.
R.B. Bartlett	Object	IP116	Although the Indication Capacity of Homes proposed for this site is rated at 350, the lower of two options prepared by the consultants Lawson Planning Partnership Ltd., I consider this figure to be too high in respect of density of housing in relation to the surrounding area; access for and consequent increased flow of traffic on the minor road at peak hours; availability of public transport and school places. I therefore call for this figure to be reduced. I also strongly oppose any public access to the site from Chilton Road or the footpath to the rear of Temple Road.	The density suggested is low and in line with family housing currently delivered in the town.
The Kesgrave Covenant Ltd	Object	IP116	The owners of St Clement's Golf Course are this company and a charity, (The Charity). The Charity is very concerned that it appears that the northern part of St Clement's site will be considered without reference to the southern golf course part. It is suggested that the future of the whole of the St Clement's site should be considered as the single entity it has always been, providing much needed housing in an outstanding location in relation to the town centre and Ipswich Hospital.	At the time of any planning application neighbouring landowners will be consulted.

Barton Willmore on behalf of Crest Nicholson	Support	IP117	Since this site is in multiple ownership, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably achievable in the long term. We support the SHLAA conclusion that the site is not developable.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP118	We note the SHLAA conclusion that 3 dwellings will come forward and the development has been implemented.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP119	We understand the Council own the site. The site is occupied by 4 apparently businesses, Cooper BMW, Builder Centre, Cattermoles Garage and Car Glass and Trim. The site is within 60 metres of high voltage overhead transmission lines with the problems that this creates in respect of Department of Health Advice. The site is within flood zone three, and therefore would need to be subject to a Strategic Flood Risk Assessment and the sequential approach should be properly applied. Therefore, we consider that the residential planning uses may not be the most appropriate use for the site. Particularly as residential development has been ruled out to the north due to noise. Recommend SHLAA conclusion: employment.	Noted. Site sheet amended to read 'Not suitable for housing development'.
Barton Willmore on behalf of Crest Nicholson	Object	IP120	The site is occupied by Jaguar and Cooper on 25 year leases with at least ten years to run. These existing uses hold significant value raising questions over the viability of the development. This site is located in flood zone three, and is actually surrounded by the river both to the east and the west. As such, the site would need to be subject to a Strategic Flood Risk Assessment and the sequential approach should be applied. The viability of redevelopment for housing is questionable, since several of the established businesses have recently invested in new modern buildings at the site. Retention of commercial uses	Cooper is relocating from the site. Likely delivery timescale for housing is in the SHLAA as years 6-10.

			is therefore more appropriate. Recommended SHLAA conclusion employment use.	
Barton Willmore on behalf of Crest Nicholson	Object	IP121	The levels across the site and the Anglian Water equipment will make development difficult. The existing/proposed kiosks over the boreholes may make development of this site difficult as the site may be unavailable for development due to its use by Anglian Water and the need to relocate equipment. Recommended SHLAA conclusion the site is not developable.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP122	The site comprises the rear gardens of two residential properties, which front Ramsey Close and Wigmore Close. Delivery is uncertain and for this reason no allocation should be made. We support the SHLAA conclusion that the site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP123	A housing scheme in this location may not be viable if the existing use is to be retained on part of the site. The housing element will be isolated in an area dominated by commercial uses and roads making it a poor location in respect of residential amenity. We note the SHLAA conclusion that the site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP124	We support the SHLAA conclusion that the site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP125	We support the SHLAA conclusion that the site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP126	We support the SHLAA conclusion that the site is not available for housing development.	No change.
Ipswich Labour Group	Support	IP126	We are pleased that the proposal to allocate this site for housing has been reversed. We support its current use as a community resource, and call for its retention.	No change.

Barton Willmore on behalf of Crest Nicholson	Support	IP127a	We support the SHLAA conclusion that 3 dwellings will come forward.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP127b	Ownership constraints are likely to make redevelopment of 127b difficult. The deliverability of this site and the viability is seriously questioned and we consider that the most appropriate option would be not to allocate the site. Since this site is in multiple ownership, we consider that it would be inappropriate for allocation as housing, as the site is neither available now, nor reasonably achievable in the long term.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP128	Site 128 has planning permission for 48 dwellings. Note the SHLAA conclusion that 48 dwellings will come forward.	No change.
Bretons	Object	IP128	The site indicated is less than that given planning permission although the indicative capacity is fine.	The site boundary has been amended.
Barton Willmore on behalf of Crest Nicholson	Object	IP129	Site 129 is fully occupational and there are complications with releasing BT land for development due to the cost of relocating expensive telecommunications infrastructure and relocating the different telecoms operators that now have the ability to use BT buildings. We understand that leases on the building have something in the order of 16 years to run.	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP130	We note the SHLAA conclusion that 12 dwellings will come forward.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP131	We note the SHLAA conclusion that 34 dwellings will come forward.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP132	We note the SHLAA conclusion for 62 dwellings.	Changed to 64 dwellings in line with the planning permission.
Barton Willmore on behalf of Crest Nicholson	Support	IP133	We note the SHLAA conclusion for 47 dwellings.	No change.

Barton Willmore on behalf of Crest Nicholson	Support	IP134	Due to the uncertainty of delivery we do not consider that the site should be allocated. We note the SHLAA conclusion that the site is not available for development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP135	We note the SHLAA conclusion of 24 dwellings.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP136	The most recent application does not propose any residential at this site, therefore it seems the developers are no longer promoting residential development on this site. As such, it is likely that this site will be unavailable for residential development in the near future. Recommend SHLAA conclusion that the site is not available for development.	We believe residential could be delivered on this site as part of a mixed use scheme.
Barton Willmore on behalf of Crest Nicholson	Support	IP137	We support the SHLAA conclusion that the site is not available for residential development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP138	The site is occupied by empty offices and any residential development would lack adequate amenity space, therefore we consider that the most appropriate use would be for the site to remain in employment use. We support the SHLAA conclusion that the site is not available for residential development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP139	We support the SHLAA conclusion that the site is not available for residential development.	No change. We believe the site is not suitable for housing development.
Barton Willmore on behalf of Crest Nicholson	Support	IP140	We note the SHLAA conclusion that the site is not available for residential development.	No change. We believe the site is not suitable for housing development.
Barton Willmore on behalf of Crest Nicholson	Support	IP141	The site has good access to the A14 and to public transport. There are a number of existing employment and retail uses nearby. This site could therefore be an accessible and high profile employment site suitable for a range of uses. We note the SHLAA conclusion that the site is not available for residential	No change.

			development.	
Barton Willmore on behalf of Crest Nicholson	Support	IP142	We note the SHLAA conclusion that the site is not available as it is required for a school and support the conclusion that the site is not deliverable for development.	No change.
Anglian Water	Object	IP143	Noted that site IP143 is also within 400m of the STW. Expect site to be listed under 'Sites not Suitable for Housing Development' as within the 400 metre cordon sanitaire of a Sewage Treatment Works.	This view needs to be balanced against the need for housing and an individual planning application should be determined on its own merits. This site is not available for residential development.
Barton Willmore on behalf of Crest Nicholson	Support	IP143	We support the SHLAA conclusion that the site is not available for housing development.	No change.
GVA Grimley on behalf of Gainsborough Retail Park Limited - In Administration	Support	IP143	We note that the Draft SHLAA concludes that housing would not be deliverable on this site because "the landowner has pursued non-residential uses". We can confirm that the site has extant planning permission for retail use and it is intended that the site should be developed and occupied accordingly, either pursuant to the existing consent or pursuant to a new, improved retail consent tailored to market demand.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP144	We support the SHLAA conclusion that the site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP145	We support the SHLAA conclusion that the site is not deliverable for development and the site is allocated for open space.	No change.
Kevin and Ann Matthews	Object	IP145	The site has been split into two for the purposes of the development framework plan. Whilst this may suit the planning	It is intended that the golf course site is kept as open

			<p>process, it nevertheless undermines a key aspect of the site appraisal. As a combined site, the area of St Clements exceeds that of Christchurch Park and also of Holywells Park. It is disappointing that the site is ear-marked for early development. In our view, important sites should only be considered when less important options are exhausted. There are demands in the overall planning process that rightly consider provision of sites that promote good health and sport. Development of St Clements is at odds with these aspirations. The site is currently in use for sports and could easily be adapted to further health and sport provision e.g. woodland walks, provision of a children's play area. Although the site is classified as a brown site, the site is predominantly a mix of green field and woodland. There are a considerable number of buildings of dubious condition that could be easily removed to facilitate the creation of an important Park area.</p>	<p>space. The St Clement's Hospital Grounds site offers the opportunity to deliver family housing in the town.</p>
The Kesgrave Covenant Ltd	Object	IP145	<p>Agree that the site is suitable and available for housing (limited amount). The site is both a suitable and attractive location for housing development, and the owners, this company and a charity, (The Charity), are able to confirm that there are no legal or ownership constraints. Disagree that the site is not achievable. There is every prospect that limited housing can be developed on an appropriate part(s) of the site during the second five year period of the 15 year Plan period. This should take place in conjunction with the planned housing development on the northern part of the whole St Clement's site. Now that the development of the northern part of the whole St Clement's Hospital site (which includes the golf course) is being considered, continuing provision of these facilities, without which the golf course could not operate, are in question.</p>	<p>Should the golf club no longer be required, the Council will seek to re-evaluate the site. The SHLAA says the site is suitable for a small element of specialist housing although this is dependent upon the relocation of the golf club.</p>

			Furthermore, the building of housing adjacent to the golf course may remove one of the nine holes and is likely to result in real problems between the housing and the golf uses. Thus there is a major possibility that the golf course will become operationally unviable. conclusion, there are no insurmountable constraints preventing the delivery and development of the site. In addition the proposal to provide the combined development of the proposed public open space with a modest amount of housing would comply with the overall aims of PPG17; which seeks to maintain an adequate supply of public open space and states that wherever possible the aim should be to achieve qualitative improvements to open spaces, sports and recreation facilities. The proposed housing will act as an enabling development to secure the provision and laying out of the public open space.	
Barton Willmore on behalf of Crest Nicholson	Support	IP146	The site has good access to the A14 and to public transport. There are a number of existing employment and retail uses nearby. This site could therefore be an accessible and high profile employment site suitable for a range of uses. We support the SHLAA conclusion that the site is not deliverable for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP147	We support the SHLAA conclusion that the site is not suitable for housing development due to the importance of the existing use.	No change.
Network Rail	Support	IP147	The current programme for the 'Bacon Chord' is for consultation and detailed design work to take place through 2010 with the intention of submitting either a draft Transport and Works Order or application for Development Consent to the Infrastructure Planning Commission, as appropriate, in October/November 2010. Subject to the necessary consents being granted it is hoped	No change.

			to start work on site in the late spring of 2012 with a completion by spring 2014.	
Barton Willmore on behalf of Crest Nicholson	Support	IP148	We support the SHLAA conclusion that the site is not available for development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP149	We support the SHLAA conclusion that the site is not suitable for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP150	Note SHLAA conclusion that 166 dwellings will be delivered between 2009 and 2012.	Changed to 155 dwellings in line with the planning permission.
Barton Willmore on behalf of Crest Nicholson	Support	IP151	We support the SHLAA conclusion that the site is not suitable for residential development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP152	We support the SHLAA conclusion that the site is not available for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP153	We agree with the SHLAA conclusion that the site is not suitable for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP154	This site is in use as a Fitness First and Staples, with car parking, these uses hold significant value. The site is therefore unavailable for redevelopment without the relocation of these units in the near future. It is by no means obvious how housing could then take up 50%. The car parking ratios on the site will be held under lease and will be required to maintain the viability of existing uses. The site is therefore not deliverable with certainty in the plan period. The risk of flooding seriously prejudices residential development on this site. There is significant uncertainty with the delivery of this redevelopment. Recommended SHLAA conclusion not available for housing development	We believe redevelopment on this site will occur during the plan period as outlined in the SHLAA.
Barton Willmore on behalf of Crest Nicholson	Support	IP155	We support the SHLAA conclusion that the site is not available for housing development.	No change.

Barton Willmore on behalf of Crest Nicholson	Object	IP156	The site should not be identified for 51 houses in the SHLAA as the planning consent for student accommodation restricts the permission to this use. There is therefore no certainty that the site is available for market housing in the first five years of the plan. The SHLAA conclusion should be that there is not a reasonable prospect that the site will be available for market housing.	Noted and amended to student accommodation.
Barton Willmore on behalf of Crest Nicholson	Support	IP157	We support the SHLAA conclusion that the site is not deliverable for development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP158	We support the SHLAA conclusion that the site is not available and deliverable for development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP159	We support the SHLAA conclusion that the site is not suitable for housing development.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP161	Note SHLAA conclusion of 13 dwellings to be delivered between 2009 and 2014.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP162	Note Planning permission implemented and site completed.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP163	Note SHLAA conclusion of 34 dwellings between 2009 and 2014 with the implementation of the existing consent.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP164	The site has planning permission for 76 dwellings. The SHLAA states that the current figure is likely to be reduced as the development is not viable and suggests 43 dwellings will come forward between 2009 and 2014. The SHLAA does not make clear why the development of 33 fewer units on the site will be viable and why the site is available and suitable to deliver housing and that this is achievable. The SHLAA conclusion should be that there is not a reasonable prospect that the site will be available for housing.	Noted and site sheet amended to 'Not deliverable' as we believe alternative uses are preferred.

Barton Willmore on behalf of Crest Nicholson	Object	IP165	The site has an expired planning permission for 218 dwellings. The SHLAA states that the current figure is likely to be reduced as the development is not viable and suggests 135 dwellings will come forward between 2009 and 2014. The SHLAA does not make clear why the development of 83 fewer units on the site will be viable and why the site is available and suitable to deliver housing and that this is achievable. The SHLAA conclusion should be that there is not a reasonable prospect that the site will be available for housing until the viability is resolved.	We expect 100 dwellings may come forward from discussions with the landowner and the site sheet has been amended to reflect this.
Barton Willmore on behalf of Crest Nicholson	Support	IP166	Note SHLAA conclusion that Planning permission is implemented for 24 dwellings and site is completed.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP167	Note SHLAA conclusion of 39 dwellings between 2009 and 2014.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP168	Note SHLAA conclusion that 48 dwellings will be delivered between 2008 and 2010 as the development is being implemented.	Changed to 51 dwellings and 2010 completion date changed to 2013.
Barton Willmore on behalf of Crest Nicholson	Support	IP169	Note SHLAA conclusion of 10 dwellings between 2009 and 2014.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP170	Note Planning permission implemented and site completed.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP172	The site should not be identified for 17 houses in the SHLAA as the planning consent for student accommodation restricts the permission to this use. There is therefore no certainty that the site is available for market housing in the first five years of the plan. The SHLAA conclusion should be that there is not a reasonable prospect that the site will be available for market housing.	Noted and amended to student accommodation.

Barton Willmore on behalf of Crest Nicholson	Support	IP173	Note SHLAA conclusion of 13 dwellings between 2009 and 2010.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP174	The SHLAA states that this site has potential for 14 dwellings. Although the site benefits from extant planning permission for residential uses, the deliverability is questionable since the scheme has not been developed since planning permission was granted and the current planning permission has lapsed. The site is not in a good location for housing being close to the town centre. As such, we do not consider that this site should be allocated for housing and the existing used should be retained. The site is in a poor residential location and the most likely scenario is the continuation of the existing use or student accommodation. Recommended SHLAA conclusion there is not a reasonable prospect that the site is available for housing or could be developed at the point envisaged.	The site had planning permission for residential and prior to expiry was expected towards end of first five years. A new permission could be forthcoming when market improves.
Barton Willmore on behalf of Crest Nicholson	Support	IP175	Note SHLAA conclusion that 12 dwellings will be delivered between 2009 and 2014 with the implementation of the existing consent.	No change.
Barton Willmore on behalf of Crest Nicholson	Support	IP176	Note SHLAA conclusion that 14 dwellings will be delivered between 2009 and 2014 with the implementation of the existing consent.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP177	The SHLAA provides no justification why the site will deliver 6 dwellings between 2009 and 2014 given that the existing consent has not been implemented in a period of high house prices. To suggest in the SHLAA that housing development will take place the Council must be clear that there are not constraints that have prevented the implementation of the old planning permission. Recommended SHLAA conclusion there is not a reasonable prospect that the site is available for housing or	The site had planning permission for residential and prior to expiry was expected towards end of first five years. A new permission could be forthcoming when market improves.

			could be developed at the point envisaged.	
Barton Willmore on behalf of Crest Nicholson	Object	IP178	The site should not be identified for 31 market houses in the SHLAA as the planning consent for student accommodation restricts the permission to this use. There is therefore no certainty that the site is available for market housing in the first five years of the plan. The SHLAA conclusion should be that there is not a reasonable prospect that the site will be available for market housing.	Noted and amended to student accommodation.
Barton Willmore on behalf of Crest Nicholson	Object	IP179	Site 179 is located west of Henley Road and north of the existing urban edge either side of Thurleston Lane. The site is on the south side of an attractive valley and has strong visual connections with the rural landscape to the north. The site is remote from the town centre, and there is little scope for creating links into the existing urban area adjacent to the site, other than via Henley Road. For these reasons the site is not considered suitable for development. Recommended SHLAA conclusion the site is not suitable for housing development.	The site was identified as an option for housing development at the issues and options stage of the LDF. There are interested parties actively promoting part of the site. The SHLAA identifies sites with potential for housing of which this is one.
Barton Willmore on behalf of Crest Nicholson	Support	IP180	In respect of the constraints listed in the SHLAA these can be overcome when development takes place on the site. It is possible to create an access to the site from Henley Road that would be linked to a park and ride and a high quality bus service into the town. There is no contamination on the site that would prevent development of the site for housing. The existing use of the land is not a constraint to development. Any recreation or open space value of the site would be enhanced through the development. We consider that development of the site is therefore achievable.	Possible contamination is identified as the existing use is agricultural. It is noted that the agent for the landowner states there is no contamination that would prevent housing development. We believe the development of the site would not be achievable within five

				years due to the infrastructure requirements needed in this broad location.
Barton Willmore on behalf of Crest Nicholson	Support	IP181	Note SHLAA conclusion of 1122 dwellings between 2015 and 2020.	No change.
Ipswich Society	Object	IP181	We would reiterate your comments in the summary section of these six sites (IP181-IP186 inclusive) but would wish to make clear our absolute opposition to any development without master planning being in place.	Noted.
Barton Willmore on behalf of Crest Nicholson	Support	IP182	Note SHLAA conclusion of 1242 dwellings between 2015 and 2020.	Noted.
Ipswich Society	Object	IP182	We would reiterate your comments in the summary section of these six sites (IP181-IP186 inclusive) but would wish to make clear our absolute opposition to any development without master planning being in place.	Noted.
Barton Willmore on behalf of Crest Nicholson	Object	IP183	Site 183 is located to the west of the Tuddenham Road and is bounded to the north by the Ipswich-Lowestoft railway. And to the west by the Felixstowe branch line. The Millennium cemetery lies to the south. The site is remote from the existing urban area and the presence of the cemetery and the Felixstowe branch line between the site and the existing urban edge would prevent satisfactory integration between any development and the existing town. For these reasons the site is not considered suitable for development.	The site was identified as an option for housing development at the issues and options stage of the LDF. The SHLAA identifies sites with potential for housing of which this is one.
Ipswich Society	Object	IP183	We would reiterate your comments in the summary section of these six sites (IP181-IP186 inclusive) but would wish to make clear our absolute opposition to any development without master planning being in place.	Noted.

Barton Willmore on behalf of Crest Nicholson	Object	IP184	Site 184 is located approximately 300 metres east of Tuddenham Road and lies on the north side of Humber Doucy Lane. It is remote from the town centre and is poorly connected to the facilities in the town. It is much smaller than the other sites and is therefore unlikely to be able to accommodate the scale of development that will be required to ensure that appropriate facilities are provided.	The site could potentially accommodate housing which is the purpose of the SHLAA and is available.
Ipswich Society	Object	IP184	We would reiterate your comments in the summary section of these six sites (IP181-IP186 inclusive) but would wish to make clear our absolute opposition to any development without master planning being in place.	Noted.
The Kesgrave Covenant Ltd	Object	IP184	Agree and Support - that the site is suitable and available for housing. Query - that only 50% of the site is to be developed for housing, particularly as the preferred density (which is supported) is low. Disagree - that the site is not achievable. Perhaps not immediately, but the suggested delivery timescale of April 2015 - March 2020 is supported and deliverable, as this will give sufficient time for any perceived infrastructure constraints to be resolved. The site has been in agricultural use for centuries and contamination is not likely.	50% of the site has been identified for housing as the site is peripheral to the built-up area and infrastructure constraints exist. Possible contamination is identified as the existing use is agricultural.
Barton Willmore on behalf of Crest Nicholson	Support	IP185	Note SHLAA conclusion of 339 dwellings between 2015 and 2020.	No change.
Ipswich Society	Object	IP185	We would reiterate your comments in the summary section of these six sites (IP181-IP186 inclusive) but would wish to make clear our absolute opposition to any development without master planning being in place.	Noted.
Barton Willmore on behalf of Crest Nicholson	Support	IP186	Note SHLAA conclusion of 41 dwellings between 2015 and 2020.	No change.

Ipswich Society	Object	IP186	We would reiterate your comments in the summary section of these six sites (IP181-IP186 inclusive) but would wish to make clear our absolute opposition to any development without master planning being in place.	Noted.
Barton Willmore on behalf of Crest Nicholson	Support	IP187	We support the SHLAA conclusion that the site is not available for development.	No change.
Barton Willmore on behalf of Crest Nicholson	Object	IP188	The viability of the development must be questionable. The flood risk will be a further significant development constraint and the employment is valuable to meet the RSS employment targets. We do not consider that there is sufficient value in residential development on the site to develop it between 2010 and 2015. Recommended SHLAA conclusion employment use.	The site is promoted by the agent for the landowner as suitable for a housing allocation.

List of Sites**Annex H****Sites with planning permission, recently expired or recently implemented planning permissions for housing development**

Site Ref	Site Name	Site Size (ha)	Indicative Capacity (Homes)
IP020a	Water Tower	0.41	6
IP021	Randwell Close	0.24	5
IP022	Foxhall Road	0.17	6
IP025	Former Garages, Recreation Way	0.19	7
IP028a	Land West of Greyfriars Road	0.06	14
IP038	Land between Vernon Street & Stoke Quay	1.43	351
IP040	Civic Centre Area / Civic Drive	0.73	11
IP043	Commercial Buildings & Jewish Burial Ground, Star Ln	0.66	106
IP059	Elton Park Industrial Estate	6.61	130
IP068	Truck and Car Co	0.22	14
IP074	Church and land at Upper Orwell Street	0.31	18
IP084	County Hall, St Helen's Street	0.84	79
IP085	345 Woodbridge Road	0.38	14
IP088	79 Cauldwell Hall Road	0.30	16
IP090	Europa Way	1.43	142
IP091	Cambridge Drive	0.63	36
IP109	R/O Jupiter Road & Reading Road	0.42	13
IP118	Rear of 76-108 Victoria Street	0.21	3
IP127a	15-39a Bucklesham Road	0.14	3
IP128	Former Driving Test Centre, Woodbridge Road	0.62	48
IP130	South of South Street	0.22	12
IP131	488-496 Woodbridge Road	0.37	34
IP132	Bridge Street, Northern Quays (west)	0.18	64
IP133	South of Felaw Street	0.41	47
IP135	112-116 Bramford Road	0.17	24
IP150	Land south of Ravenswood	34.78	155
IP161	2 Park Road	0.35	13
IP162	52 Belstead Road	0.23	9
IP163	Rear of 411-417 Bramford Road	0.75	34
IP165	Eastway Business Park, Europa Way	2.08	100
IP166	Former Reservoir, Spring Road	0.25	24
IP167	11 St Georges Street	0.17	39
IP168	Stoke Park Drive	2.45	51
IP169	23-25 Burrell Road	0.08	10
IP172	15-19 St Margaret's Green	0.08	17
IP173	36-48 St Helen's Street	0.06	13
IP174	12 Tacket Street	0.04	14
IP175	47-51 Waveney Road	0.15	12
IP176	7-9 Woodbridge Road	0.05	14
IP177	Lock-up Garages rear of 16-30 Richmond Road	0.13	6
	Total		1714

IP-One Area Period 1 (Years 1-5)

Site Ref	Site Name	Site Size (ha)	Indicative Capacity (Homes)
IP014	Orwell Church	0.21	23
IP039	Land between Vernon Street & Stoke Quay	1.09	96
IP047	Land at Commercial Road	4.59	101
IP049	No 8 Shed, Orwell Quay	0.76	200
IP054	Land between Old Cattle Market & Star Lane	1.71	94
IP080	240 Wherstead Road	0.49	26
IP096	Car Park Handford Road East	0.22	10
IP098	Transco, south of Patteson Road	0.64	63
IP188	Websters Saleyard site, Dock Street	0.11	10
	Total		623

IP-One Area Period 2 (Years 6-10)

Site Ref	Site Name	Site Size (ha)	Indicative Capacity (Homes)
IP003	Waste tip north of Sir Alf Ramsey Way	1.57	173
IP004	Bus depot, Sir Alf Ramsey Way	1.07	59
IP006	Co-op Warehouse, Paul's Road	0.63	28
IP007	Ranelagh School	0.50	18
IP011b	Smart Street, Foundation Street	0.69	61
IP015	West End Road Surface Car Park	1.22	27
IP028b	Land West of Greyfriars Road (Jewsons)	0.97	21
IP031	Burrell Road	0.74	81
IP036b	Shed 7	0.79	65
IP037	Island Site	6.02	331
IP041	Civic Centre Area / Civic Drive	0.52	29
IP044	Land South of Mather Way	0.78	17
IP045	Holywells Road West / Toller Road	2.06	113
IP048	Mint Quarter	3.08	68
IP050	Land West of New Cut	0.46	25
IP051	Old Cattle Market, Portman Road – South	1.85	41
IP055	Crown House etc., Crown Street	2.61	57
IP064	Holywells Road East	2.29	52
IP081	Land North of Ranelagh Road	0.36	32
IP083	Banks of river, upriver from Princes Street	0.76	17
IP089	Waterworks Street	0.31	34
IP120	Land West of West End Road	1.03	46
IP136	Silo, College Street	0.16	21
IP154	Russell Road	1.01	56
	Total		1472

Rest of Borough Period 1 (Years 1-5)

Site Ref	Site Name	Site Size (ha)	Indicative Capacity (Homes)
IP005	Former Tooks Bakery, Old Norwich Road	2.80	100
IP010a	Co-op Depot, Felixstowe Road	3.88	110
IP016	Funeral Directors, Suffolk Road	1.04	34
IP029	Land opposite 674-734 Bramford Road	2.26	51
IP032	King George V Field, Old Norwich Road	3.54	62
IP033	Land at Bramford Road (Stocks site)	2.03	46
IP065	Former 405 Club, Bader Close	3.22	87
IP073	Thomas Wolsey Special School, Old Norwich Road	1.38	62
IP116	St Clement's Hospital Grounds	12.57	350
	Total		902

Rest of Borough Period 2 (Years 6-10)

Site Ref	Site Name	Site Size (ha)	Indicative Capacity (Homes)
IP009	Victoria Nurseries, Westerfield Road	0.39	14
IP010b	Felixstowe Road	2.79	75
IP013	Hill House Road	0.10	5
IP018	Deben Road	0.36	16
IP020b	Water Tower, Park Road	1.20	42
IP058	Raeburn Road South / Sandy Hill Lane	5.85	102
IP066	JJ Wilson, White Elm Street	0.22	10
IP067	Former British Energy Site	5.25	37
IP072	Cocksedge Engineering, Sandy Hill Lane	0.63	22
IP097	Telephone Exchange, Portman Road	0.53	24
IP101	Rear of Stratford Road & Cedarcroft Road	0.20	9
IP104	301-305 Norwich Road	0.66	15
IP105	Depot, Beaconsfield Road	0.34	15
IP108	Builders Yard, Vermont Crescent	0.20	7
IP112	2 & 4 Derby Road	0.49	22
IP113	The Railway PH, Foxhall Road	0.34	3
IP121	Front of pumping station, Belstead Road	0.60	27
IP129	BT Depot, Woodbridge Road	1.07	48
	Total		493

Rest of Borough Period 2 (Years 6-10) as part of broad location (Years 11-15)

Site Ref	Site Name	Site Size (ha)	Indicative Capacity (Homes)
IP179	Land surrounding Thurleston Lane (part of option A)	32.10	562
IP180	Land to east of Henley Road north of Railway Line (part of option B)	75.69	2044
IP181	Land west of Westerfield Road (part of option C)	41.57	1122
IP182	Land to the east of Westerfield Road (part of option D)	59.16	1242
IP183	Land north of Millennium Cemetery (part of option E)	21.95	384
IP184	Land adjacent to Humber Doucy Lane (part of option F)	12.94	226
IP185	Ipswich School Playing Field (part of option C)	12.55	339
IP186	Land opposite 289-299 Henley Road	1.50	41
	Total		5960

Sites for Student Accommodation

Site Ref	Site Name	Site Size (ha)	Indicative Capacity (Homes)
IP001	Land between 81-97 Fore Street	0.12	5
IP011a	Smart Street, Foundation Street	0.16	0
IP012	Peter's Ice Cream	0.32	68
IP036a	Shed 7	1.13	152
IP052	Land between Lower Orwell Street & Star Lane	0.40	26
IP156	Land between Star Lane & College St east of Slade St	0.24	51
IP172	15-19 St Margaret's Green	0.08	17
IP178	Island House, Duke Street	0.09	31
	Total		350

Sites Not Deliverable

Site Ref	Site Name	Site Size (ha)	Reason
IP002	Handford Road East	0.46	Alternative use preferred
IP008	All Weather Area, Halifax Road	0.78	Site not available
IP017	Land West of Handford Cut	0.49	Site not available
IP019	153-159 Valley Road	0.25	Permission implemented
IP023	Fire Station, Colchester Road	1.21	Existing use
IP024	Mallard Way Garages	0.14	Poor access
IP026	163 & 165 Henniker Road	0.16	Existing use
IP027	Widgeon Close Garages	0.10	Poor access
IP030	Land at Humber Doucy Lane	2.48	Drainage
IP035	Key Street / Star Lane / Burtons Site	0.54	Alternative use preferred
IP046	Wolsey Street	0.26	Site not available
IP053	Orwell Retail Park, Ranelagh Road	3.61	Site not available

IP057	Princes Street / New Cardinal Street	0.42	Alternative use preferred
IP060	Fison House, Princes Street	0.35	Existing use
IP061	School site, Lavenham Road	1.08	Alternative use preferred
IP062	London Road Allotments	1.55	Site not available
IP063	London Road Allotments	0.73	Site not available
IP069	Land between Cobbold St & Woodbridge Rd	0.19	Site not available
IP071	St Edmund House, Rope Walk	0.43	Existing use
IP075	Playing fields, Victory Road	0.43	Alternative use preferred
IP076	Land at Yarmouth Road	0.78	Site not available
IP082	83/85 Dales Road	0.57	Existing use
IP093	Chantry Close, London Road	0.41	Alternative use preferred
IP094	Rear of Grafton House, Russell Road	0.31	Alternative use preferred
IP095	Morpeth House, 97-99 Lacey Street	0.31	Site not available
IP100	6-24 Defoe Road	0.20	Site not available
IP102	Henniker Road (R/O 668-730 Bramford Road)	0.36	Site not available
IP103	32 Larchcroft Road	0.23	Site not available
IP106	R/O Riverside Road / Bramford Road	0.34	Site not available
IP107	R/O 601-655 Bramford Road	0.95	Site not available
IP110	14 Crofton Road	0.26	Site not available
IP111	Club, Newton Road	0.32	Existing use
IP114	R/O Cauldwell Hall Rd & Kemball St	0.20	Poor access
IP115	547 Foxhall Road & land to rear	0.37	Site not available
IP117	R/O Allenby Road & Hadleigh Road	0.46	Poor access
IP122	R/O 17-27 Ramsey Close (Wigmore Close)	0.36	Site not available
IP123	Car Park, Crown St/Tower Ramparts	0.29	Site not available
IP124	100 Clapgate Lane	0.32	Site not available
IP125	Corner Hawke Road & Holbrook Road	0.25	Site not available
IP126	251 Clapgate Lane	0.58	Site not available
IP134	St Matthews Street	0.40	Alternative use preferred
IP137	Running Buck PH, St Margaret's Plain	0.15	Site not available
IP138	235/255 Ranelagh Road	0.16	Site not available
IP141	Cranes site	16.74	Alternative use preferred
IP142	Duke Street	1.20	Alternative use preferred
IP143	Former Norsk Hydro Site, Sandy Hill Lane	6.55	Alternative use preferred
IP144	Wooded area and large verge, Birkfield Drive	2.11	Site not available
IP145	St Clement's Golf Course	13.15	Existing use
IP148	Land south of A14	14.32	Site not available
IP152	Airport Farm Kennels, north of A14	8.40	Alternative use preferred
IP155	Halifax Road Sports Ground	4.67	Site not available
IP157	Land fronting the northern quays of the Waterfront eastern end	0.40	Existing use
IP158	Princes Street / Portman Road	0.29	Existing use
IP164	Former Kennings, Duke Street	0.26	Alternative use preferred
IP170	Currier's Lane	0.09	Alternative use implemented
IP187	Goods Vehicle Testing Station, Landseer Road	1.34	Existing use

Sites Not Suitable for Housing Development

Site Ref	Site Name	Site Size (ha)	Reason
IP034	578 Wherstead Road	0.64	Flood Risk
IP042	Land between Cliff Quay & Landseer Road	3.78	Sewage Works proximity
IP056	Russell Rd/ Princes St/ Chancery Rd	0.63	Poor location
IP070	Orwell Quay	0.42	Not appropriate
IP077a	Drunken Docker area (north)	0.25	Existing use
IP077b	Drunken Docker area (south)	1.33	Existing use
IP078	Land north of Whitton Sports Centre	0.85	Existing use
IP079	Land south of Sewage Works	4.16	Sewage Works proximity
IP086	Area north of Carr Street	0.78	Existing use
IP087	Car Park off St Nicholas Street	0.17	Existing use
IP092	427 Wherstead Road	0.29	Flood Risk
IP099	Part former Volvo site, Raeburn Road south	2.29	Sewage Works proximity
IP119	Land East of West End Road	0.93	Shape and location
IP127b	15-39a Bucklesham Road	1.06	Sewer
IP139	Royal Mail Sorting Office, Commercial Road	1.31	Poor location
IP140	Land north of Whitton Lane	6.92	Noise
IP146	Ransomes Europark (east)	16.69	Existing use
IP147	Land between railway junction and Hadleigh Road	7.57	Noise
IP149	Land at Pond Hall Farm, south of the A14	10.02	Access
IP151	Lister's, Landseer Road	1.46	Hazardous substance proximity
IP153	Car Park, Sir Alf Ramsey Way / Portman Road	0.17	Overshadowed
IP159	30 Knightsdale Road	3.40	Existing use

Site Sheets