

Rep number	Document	Policy / Paragraph	Respondent/s	Summary	IBC Response
<b>CORE STRATEGY REVIEW PRE-SUBMISSION MAIN MODIFICATIONS STAGE</b>					
24219	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	4 - CS4 Protecting our Assets (MOD 1)	Historic England (Mr Tom Gilbert-Woodridge) [243]	We welcome the proposed main modification to Policy CS4, which largely addresses our concerns with the Proposed Submission draft. Although the additional wording to the third sentence does not fully reflect our suggested wording, the modification does enough to overcome our concerns. Amending 'historical' to 'heritage' in the first sentence is also welcomed.  While it does not form part of the current public consultation, we note and welcome the additional modifications to paragraphs 8.46, 8.53 and 8.55.	This confirmation is welcomed.
24220	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	17 - DM5 Design and Character (MOD 1)	Historic England (Mr Tom Gilbert-Woodridge) [243]	We support the proposed main modification which adds reference to the setting of listed buildings to Part (e) of the policy.	This support is welcomed.
24221	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	19 - DM6 Tall Buildings	Historic England (Mr Tom Gilbert-Woodridge) [243]	We support the proposed main modification which adds reference to listed buildings and other heritage assets into clause (j). This addresses our concerns regarding the wording of this policy.	This support is welcomed.
24222	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	20 - DM8 Heritage Assets and Conservation	Historic England (Mr Tom Gilbert-Woodridge) [243]	Re-labelling Part (a) as 'designated and un-designated assets' and adding a third and fourth paragraph is helpful in terms of covering other heritage asset types and the issue of demolition. It provides the minimum required text to address our concerns, although in the new fourth paragraph, parks and gardens are 'registered', not 'scheduled'.  We welcome the modification to Part (b) in terms of point (i) which clarifies that a building/structure can be demolished if it does not make a positive contribution to the significance of the conservation area.	This confirmation is welcomed. Please refer to the statement of common ground between IBC, SCC and Historic England in relation to correcting 'scheduled parks' to 'registered parks'.
24223	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	20 - DM8 Heritage Assets and Conservation	Historic England (Mr Tom Gilbert-Woodridge) [243]	We have concerns regarding the proposed main modifications to the archaeology paragraphs in Part (c) in terms of the deleted reference to the Area of Archaeological Importance (AAI). Removing reference to the AAI means that there is no policy guidance as to what the AAI means in terms of development proposals. We consider this modification to be unsound as it not effective in terms of delivering the plan. It does not provide sufficient clarity regarding the status of the AAI.	Please refer to statement of common ground between IBC, SCC and Historic England, which addresses this objection. The Council proposes to reinstate reference to the AAI.
24230	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	2 - CS2 The Location and Nature of Development (MOD 1)	Crest Strategic Projects (Miss Leah Needham) [2050]	Emerging Policy CS2: The Location and Nature of Development - We support the amendment to the wording of Policy CS2 which removes the requirement to provide suitable infrastructure 'prior' to the delivery of the IGS. This reflects Table 9B in Chapter 10 of the Proposed Submission Core Strategy, which sets out trigger points for the delivery of items of infrastructure (this table is not proposed to be modified).	This support is welcomed.
24231	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	10 - CS10 Ipswich Garden Suburb / Paragraph 8.108	Crest Strategic Projects (Miss Leah Needham) [2050]	Support additional text within Policy CS10 and the supporting text, which reinforces the need for a comprehensive approach to the development of the IGS and reflects the need for proposals to positively facilitate and not prejudice the development of other phases. This aligns with current work being undertaken on the Infrastructure Delivery Plan and Collaboration Agreement. Crest is a key delivery partner of the IGS. The commitment within the Core Strategy to a comprehensive and coordinated approach to the development of IGS is essential to ensure the delivery of infrastructure at an appropriate time by the relevant parties.	This support is welcomed.
24232	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	13 - CS17 Infrastructure	Crest Strategic Projects (Miss Leah Needham) [2050]	Emerging Policy CS17: Delivering Infrastructure - We support the addition of text to clarify that the direct provision of infrastructure by developers is allowed as mitigation for impacts, as an alternative to a commuted sum or CIL payment. This provides sufficient flexibility for developers. We suggest that similar text is also included within Policy CS10.	Support of the change to CS17 is welcomed. The same change is not necessary to CS10 also, as policy CS10 states that the Infrastructure Delivery Plan (IDP) will set out more detail about delivery at Ipswich Garden Suburb. It does not specify how delivery may happen, as the IDP will deal with it.
24233	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	16 - DM1 Sustainable Design and Construction	Crest Strategic Projects (Miss Leah Needham) [2050]	We support the amendment to Policy DM1 which reflects the withdrawal of the Code for Sustainable Homes. However, we object to Part a. of Policy DM1 and this should be removed. The Written Ministerial Statement March 2015 and 'Fixing the Foundations' July 2015 indicate that LPAs should not set additional local technical standards for new dwellings and that the Government does not intend to proceed with 'Allowable Solutions' or the proposed increased energy efficiency requirement. Therefore, LPAs cannot require developments to meet standards higher than those set in the Building Regulations Part L.	Whilst it is acknowledged that the Government no longer intends to proceed with Allowables Solutions, Regulation 43 of the Deregulation Act has not yet been commenced and there planning authorities are able to set standards for energy efficiency under the Planning and Energy Act 2008.
24234	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	17 - DM5 Design and Character (MOD 1)	Crest Strategic Projects (Miss Leah Needham) [2050]	This policy now requires that 35% of new dwellings, built on developments of 10 or more dwellings, are built to Building Regulations standard M4(2) and where affordable housing is provided a proportion of dwellings should be built to Building Regulations standard M4(3). There is no robust evidence to justify this requirement and without this we object to the Policy. However, we welcome the flexibility provided within the Policy which will ensure that the requirements do not hinder development in circumstances where it is not possible to accommodate the requirement and/or in case were the requirement would render the development unviable.	The paper 'Background to Requirement for Adaptable and Accessible Dwellings (Policy DM5), Core Document Library reference LPCD51, explains and justifies the requirement.
24235	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	20 - DM8 Heritage Assets and Conservation	Crest Strategic Projects (Miss Leah Needham) [2050]	Modifications to this Policy are not proposed, however our previous representations (Barton Willmore, March 2015) highlighted concerns regarding Part b. 'Conservation Areas' which states that the position, height, mass and materials of a proposed building shall pay regard to the character of adjoining buildings. This is not objected to however, the weight that should be attached to the character of buildings should be proportionate to their status and this should be reflected in the Policy wording to ensure that it is 'justified'. [Note - DM8 Part b Conservation Areas has been modified.]	The reasoned justification at 9.69 explains how the policy requirement would be implemented, using the Conservation Area Character Appraisals which identify the distinctive features or characteristics of such areas.
24236	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	25 - DM24 Affordable Housing	Crest Strategic Projects (Miss Leah Needham) [2050]	The amendment to this Policy to reflect the withdrawal of the Code for Sustainable Homes is supported.	This support is welcomed.
24237	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	29 - DM30 9.181 / 9.192	Crest Strategic Projects (Miss Leah Needham) [2050]	Emerging Policy DM30: The Density of Residential Development - The Written Ministerial Statement - March 2015 introduces new Nationally Described Space Standards for housing. These regulations are optional and the Planning Practice Guidance (PPG) (ID: 56-002-20150327) requires LPAs to gather evidence to determine whether there is a need for additional standards and the viability implications. The Council has not demonstrated there is a need or provided evidence regarding viability and therefore we object to this policy.	The reasoned justification proposed through the Pre-Submission Main Modifications states that the Council encourages the use of the space standards, it does not require them. The evidence is the same as that for the superseded reference to the English Partnerships standards and is as set out in the reasoned justification to the policy. It refers to the scale of growth planned in Ipswich, the role of flats in meeting growth requirements in the IP-One area and the need to ensure that new homes provide sustainable living accommodation. The whole plan viability testing took account of the size of units, based upon the average size of new units in the Borough (see Viability Testing of Ipswich Development Plan - LPCD26)
24238	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mrs Anne-Marie Stewart [2044]	We are disappointed that the main issues raised at the last consultation meeting have not been addressed. The entire Northern Fringe Development will be high risk due to severe traffic congestion, poor air quality and lack of sewage infrastructure. Good quality farm land, essential for food for the future will be concreted over. Also, the hospital is already over-stretched. The assessment of housing need has not been updated and there seem to be obstacles to jobs growth identified by a report by Peter Brett Associates in December 2014.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts.
24239	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Richard Stewart [1300]	We are disappointed that the main issues raised at the last consultation meeting have not been addressed. The entire Northern Fringe Development will be high risk due to severe traffic congestion, poor air quality and lack of sewage infrastructure. Good quality farm land, essential for food for the future will be concreted over. Also, the hospital is already over-stretched. The assessment of housing need has not been updated and there seem to be obstacles to jobs growth identified by a report by Peter Brett Associates in December 2014.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts.
24243	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	5 - CS4 Protecting our Assets (MOD 2)	Suffolk County Council (Mr Robert Feakes) [356]	CS4 - The County Council supports this amendment, which will help ensure compliance with the biodiversity duty as set out in the Natural Environment and Rural Communities Act 2006. It improves the soundness of the proposed policy through stronger legal compliance and a more effective response to the requirements of paragraph 109 of the National Planning Policy Framework.	This support is welcomed.
24244	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	18 - DM5 Design and Character (MOD 2)	Suffolk County Council (Mr Robert Feakes) [356]	DM5 (In reference to the M4(2) accessibility standard). The County Council supports the amendment relating to higher accessibility standards in new development, subject to viability assessment as set out in national guidance.	This support is welcomed.
24245	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	20 - DM8 Heritage Assets and Conservation	Suffolk County Council (Mr Robert Feakes) [356]	The County Council welcomes the amendment pertaining to archaeology, which is in line with earlier representations and subsequent discussion. The revised policy wording represents a much clearer approach to archaeological assessment which is proportionate and consistent with the intent of the NPPF. The minor modifications to the Core Strategy explain the role of the Area of Archaeological Importance in signposting developers as to where there is greater potential for archaeological finds. Ipswich's long history of occupation means that there is strong potential for significant finds in certain locations. This policy ensures that proper and proportionate assessment will be carried out.	Please refer to statement of common ground between IBC, SCC and Historic England, which further addresses the Area of Archaeological Importance.

24246	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	23 - DM18 Car and Cycle Parking	Suffolk County Council (Mr Robert Feakes) [356]	The County Council welcomes this amendment to reflect the adoption, by the Borough Council, of countywide guidance on parking standards.	This support is welcomed.
24247	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	27 - DM25 / 9.152	Suffolk County Council (Mr Robert Feakes) [356]	The County Council welcomes the amendment to improve consistency with the adopted Suffolk Waste Plan.	This support is welcomed.
24248	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	34 - DM34 Countryside (MOD 1)	Suffolk County Council (Mr Robert Feakes) [356]	The County Council welcomes this amendment, which helps to protect the characteristics of the Area of Outstanding Natural Beauty from the impacts of development outside the designated area.	This support is welcomed.
24249	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Stewart Quanttrill [995]	We are concerned that very few of the earlier representations have not been incorporated into the amended documents. There is little point in having a public consultation if the majority of valid concerns are ignored.  The allocation of the Northern Fringe without considering the total effect of the traffic congestion that will result will not add to the "Ipswich Vision". The housing should be phased to trigger additional road capacity by way of a northern bypass. The Wet Dock Crossing will not assist congestion in north Ipswich. The road capacity will not be achieved with improvements to existing junctions/traffic lights.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation and its impacts. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications.
24250	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mrs Linda Quanttrill [794]	We are concerned that very few of the earlier representations have not been incorporated into the amended documents. There is little point in having a public consultation if the majority of valid concerns are ignored.  The allocation of the Northern Fringe without considering the total effect of the traffic congestion that will result will not add to the "Ipswich Vision". The housing should be phased to trigger additional road capacity by way of a northern bypass. The Wet Dock Crossing will not assist congestion in north Ipswich. The road capacity will not be achieved with improvements to existing junctions/traffic lights.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation and its impacts. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications.
24251	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	12 - CS13 Planning Jobs for Growth	Mr Alexander McDonald [1355]	I am writing to express disappointment that the key issues raised at the last consultation have been ignored in the modifications. There has been no reasons given.  There has been failure to address the obstacles to jobs growth identified in the viability testing report produced by experts Peter Brett associated in December 2014 and the employment space requirements shown by the East of England forecasting 2015 model.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts.
24252	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	13 - CS17 Infrastructure	Mr Alexander McDonald [1355]	I am writing to express disappointment that the key issues raised at the last consultation have been ignored in the modifications. There has been no reasons given.  There has been a failure to address the cumulative needs for key strategic infrastructure within the Borough such as new roads and drainage as the existing are already full to capacity. Also there has been a failure to address the obstacles to jobs growth identified in the viability testing report produced by Peter Brett Associates and the employment space requirements shown by the East of England Forecasting Model.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications.
24253	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Chris O'Brien [2047]	Writing to let you know that myself and family strongly object to the Northern Fringe proposal and of disgust at the way IBC has completely failed to address the substantial number of key issues raised during previous consultation, without offering any explanation.  The Northern Fringe is currently one of the most beautiful open spaces within easy reach of Ipswich. To develop it will be to spoil it beyond repair and deny thousands of residents easy access to the countryside.  Believe that the environmental consequences (including traffic, sewage and lack of natural space) of damaging this area will be extremely negative.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. The impacts of the allocation have been assessed through a Sustainability Appraisal of the Core Strategy Review (see Core Document Library reference SUC09). A more detailed Environmental Impact Assessment would be carried out at planning application stage.
24254	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	13 - CS17 Infrastructure	Natural England (Alison Collins) [2048]	We welcome the amendment to ensure that the Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment (HRA) can be addressed, including for any measures not classified as infrastructure. However, we advise that reference is also made to the mitigation strategy, as this is the document which should specify the detailed mitigation measures that will need to be delivered to ensure development proposed in the plan will not have an adverse effect on any European Protected sites. We therefore advise inserting the additional text to ensure the plan complies with the Habitats Regulations.	The statement of common ground between Natural England and Ipswich Borough Council, which was attached to the Council's response in relation to Matter 1, explains that the Council and Natural England would support an amendment as follows: 'The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Mitigation Strategy can be addressed and delivered, including for any measures not classified as infrastructure.'
24255	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr George Duncan [2046]	Disappointed that the documents fail to address the main concerns raised on the previous proposals; which were on the need and cost of basic infrastructure.  The existing road network is close to maximum capacity. Only solution is for a northern bypass. This would also overcome difficulties with the Orwell Bridge.  Ignoring problems associated with site drainage will place additional burdens on residents, and cause chaos on the route needed for new drainage.  The viability and sustainability of this development should be reassessed, especially given the lack of effort to co-ordinate with neighbouring authorities on matters such as housing and jobs.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan - this would include reference to sewerage. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications. The Council's Duty to Co-operate was addressed through the Stage 1 hearings held in March 2016.
24256	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Verna H Duncan [2045]	It appears that we are going over old ground. Issues that were raised in previous consultations have not been addressed. Without addressing these issues this area could be turned into a tip' to live in - unhealthy, noisy, dangerous.  The traffic in the north of Ipswich regularly at peak times is at maximum. Before any more houses are built, a north bypass is needed. Will also solve air quality problems.  The sewage problem need to be addressed before any houses are built. More local jobs are also needed.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan - this would include reference to sewerage. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications.
24259	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	14 - CS17 / New 8.183	Natural England (Alison Collins) [2048]	We are pleased to see a link with the mitigation measures identified in the Habitats Regulations Assessment (HRA) of the Core Strategy. However, the final sentence 'The Council is...' is not sufficient to satisfy the requirements of the Habitats Regulations. There needs to be a commitment in the policy to having a mitigation strategy in place, ideally by the time the plan is adopted or by a specified timescale shortly afterwards. This is necessary to give certainty that the mitigation measures will be delivered to ensure the plan is compliant with the Habitats Regulations and NPPF paragraphs 113 and 116.	The statement of common ground between Natural England and Ipswich Borough Council, which was attached to the Council's response in relation to Matter 1, explains that the Council and Natural England would support the inclusion of text as follows: 'The Council will produce a Recreational Avoidance and Mitigation Strategy by March 2017 which will specify the measures required and how these will be delivered.'
24260	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	30 - DM31 / 9.187	Natural England (Alison Collins) [2048]	We welcome the amendment to ensure that developer contributions may be sought in some instances in relation to mitigation measures identified through assessments at planning application stage.	This support is welcomed.
24261	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	34 - DM34 Countryside (MOD 1)	Natural England (Alison Collins) [2048]	We agree with the amendment to clarify that the landscape and scenic beauty of the AONB should be conserved.	This support is welcomed.
24263	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Statement of Consultation doesn't accurately capture issues raised, including uncertainty over deliverability of allocating the entire Northern Fringe due to traffic congestion, air quality impacts and lack of sewage infrastructure. Failure to address cumulative needs for infrastructure including roads, sewage and health/social care.  Allocating in entirety may exacerbate flooding - should be shown on Map 2. High risk strategy, should be phased. Appendix 5 should reflect issues. Impacts of public sector job losses, income:house price ratios, impacts on Suffolk Coastal villages, Housing and Planning Bill, real reasons for pre-submission main modifications, current planning application and alternatives also should be considered.	The Statement of Consultation (CDI reference SUCD16) includes the Council's summary of the main issues raised through representations. However, the representation summaries are included as an appendix to the document and the Inspector also has a full set of the duly made representations.  The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts.
24264	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	1 - CS1 Sustainable Development - Climate Change	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. Climate change remains unaddressed and multi start development at the Northern Fringe is more likely to exacerbate flood risk and compromise CS4.	Not all of the policies CS1 to CS6 and CS11 to CS20 have been subject to modifications. Policy CS6 has been dealt with through the Stage 1 hearings. The other CS policies referred to above will be discussed at the Stage 2 hearings, as will the merits of the Ipswich Garden Suburb allocation, and its impacts. The adopted versions of the 'CS' policies have proved deliverable and the whole plan viability assessment (Core Document Library reference LPOD26 and 27) indicates that the plan is viable. The plan addresses climate change through many policies, including CS1, DM1, DM2 and DM4. At the Ipswich Garden Suburb, the Supplementary Planning Document sets out an overall approach to sustainable drainage and detailed proposals would be worked up through the planning applications.

24266	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	11 - CS11 Gypsy and Traveller Accommodation	National Federation of Gypsy Liaison Groups (Mr Roger Yarwood) [1213]	The change to 'preferably' from 'where possible' is supported. The new criteria are unacceptable. Whilst these issues of need and personal circumstances can weigh in favour of a proposal, they are not issues which can be regarded as criteria to assess acceptability. Such a stance does not accord with guidance in paragraph 10 of Planning Policy for Traveller Sites.	The criteria are carried across from Site Allocations policy SP4 which the Council proposes to delete and reflect the criteria set out under paragraph 24 of Planning Policy for Traveller Sites (Core Document library ref NCD22)
24267	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	16 - DM1 Sustainable Design and Construction	Home Builders Federation Ltd (Mr James Stevens) [283]	Requiring residential development to achieve a 19% improvement in energy efficiency over Part L of the Building Regulations is contrary to national policy in the Written Ministerial Statement March 2015, the Deregulation Act 2015 (S.43), and Fixing the Foundations July 2015. The Government is not proceeding with zero carbon Allowable Solutions or the proposed 2016 increase in on-site energy efficiency standards. It does not wish LPAs to set targets higher than the Building Regulations. The Council cannot require that applicants go further than Part L 2013. The Council should also consider the viability implications of the water efficiency standard.	Whilst it is acknowledged that the Government no longer intends to proceed with Allowables Solutions, Regulation 43 of the Deregulation Act has not yet been commenced and there planning authorities are able to set standards for energy efficiency under the Planning and Energy Act 2008.
24268	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	18 - DM5 Design and Character (MOD 2)	Home Builders Federation Ltd (Mr James Stevens) [283]	The policy in relation to the Part M optional technical standards is unsound because the benefits of the optional technical standards has not been justified. Before these can be adopted in the local plan the Council will need to demonstrate need and the effect on viability. The Viability Testing for the Ipswich Development Plan report, December 2014, has not assessed the cost of applying these standards. The DCLG report: Housing Standards Review: Cost Impacts, September 2014 summarises the costs (p.38). The Council will also need to justify the 35% figure for Part M(2) and the percentage figure for Part M(3).	The requirement is explained and justified through the paper 'Background to Requirement for Adaptable and Accessible Dwellings (Policy DM5), Core Document Library reference LPCD51. This paper also considers its viability implications.
24269	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	28 - DM29 Provision of New Open Spaces, Sport and Recreation Facilities	Home Builders Federation Ltd (Mr James Stevens) [283]	The part of the policy in relation to residential development is unjustified. The policy requires that developments of 15 dwellings or more provide at least 10% of the area, or 15% in higher density schemes, as public green space. In view of the Council's inability to meet its OAN in full, and because there is no plan to provide for these unmet needs elsewhere, we consider that this policy requirement is unjustified.	The requirement for at least 10% of a major development site to be open space has been applied successfully by the Borough Council for at least eighteen years (see CDL reference IC44, 1998). It was carried forward into the adopted Core Strategy in 2011 and relates as much to creating attractive places to live as meeting open space requirements. There are Borough-wide deficits of one type of open space, sport and recreation facility or another (see CDL reference ICDD3 and the draft Public Open Space SPD, CDL reference PSD21). Depending on what is in deficit in an area where a development site is located, new development will be required to meet its own needs according to the standards. It is not the intention of the policy that developments should rectify existing deficits. The need for on-site space is also related to Habitats Regulations Assessment mitigation, and is flagged up through policy CS16 (CDL reference SUCCD11).
24270	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	29 - DM30 9.181 / 9.192	Home Builders Federation Ltd (Mr James Stevens) [283]	The requirement that new residential development complies with the Nationally Described Space Standard is unjustified. The Council has not demonstrated that the relevant tests set out in the NPPG have been satisfied (need, viability and timing). The Council should provide a justification for requiring the Nationally Described Space Standard. Given the scale of the unmet need in Ipswich, we would question the efficacy of adopting the standard. The plan should also specify a reasonable transition period to provide for legacy projects or land transactions currently underway. The Council should have regard to the effect the standard will have on affordability.	The reasoned justification proposed through the Pre-Submission Main Modifications states that the Council encourages the use of the space standards, it does not require them. The evidence is the same as that for the superseded reference to the English Partnerships standards and is as set out in the reasoned justification to the policy. It refers to the scale of growth planned in Ipswich, the role of flats in meeting growth requirements in the IP-One area and the need to ensure that new homes provide sustainable living accommodation. The whole plan viability testing took account of the size of units, based upon the average size of new units in the Borough (see Viability Testing of Ipswich Development Plan - LPCD26)
24271	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Colin Girling [696]	As a member of the Northern Fringe Protection Group, I am extremely disturbed to learn that key issues raised in the last consultation have been ignored, no explanation has been offered for this. Allocating the entire Ipswich Northern Fringe is a high risk strategy, as delivery may not be viable. There has been failure to address cumulative infrastructure needs and a lack of cross border co-operation on jobs and housing. Housing need data has not been updated. Obstacles identified through the Peter Brett report have not been addressed, nor has the impact of the sugar beet factory been considered.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan. Housing need and the Duty to Co-operate with neighbouring areas was addressed through the Stage 1 hearings held in March 2016.
24272	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mrs Ann Stonebridge [454]	We are very disappointed to learn that our key issues raised in our previous letters appear to have been totally ignored. No explanation has been put forward as to why 1090 letters from local people have been ignored, raising a total of 9325 submissions. We can only assume that the scheme is to be 'steam rolled' through at any cost regardless of anyone's opinions. By totally ignoring public concerns, sadly our confidence in local democracy has fallen to zero.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts.
24273	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Peter Stonebridge [375]	We are very disappointed to learn that our key issues raised in our previous letters appear to have been totally ignored. No explanation has been put forward as to why 1090 letters have been ignored, raising a total of 9325 submissions. We can only assume that the scheme is to be 'steam rolled' through at any cost regardless of anyone's opinions. By totally ignoring public concerns, sadly our confidence in local democracy has fallen to zero.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts.
24274	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Roger Day [2041]	I am concerned to see that several key issues raised have not been addressed through the Pre-Submission Main Modifications. 1. Failure to address the needs for key infrastructure within the Borough including roads and sewerage both of which are at full capacity. 2. The allocation of the entire Northern Fringe is a high risk strategy since delivery may not be viable. 3. How will the Sugar Beet site impact on jobs and homes growth? 4. The assessment of housing need has not been updated to reflect the most recent information.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan. The former sugar beet factory is outside the Borough area and therefore outside its jurisdiction as a local planning authority. Any contribution it may make to meeting Ipswich's needs will be discussed through joint work planned across the Ipswich Policy Area. Housing need was addressed through the Stage 1 hearings held in March 2016.
24275	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	28 - DM29 Provision of New Open Spaces, Sport and Recreation Facilities	Sports England (Mr Philip Raiswell) [290]	Sport England supports the modifications made to this policy which now include the need to provide for indoor as well as outdoor sports facilities where justified. The policy supporting text also makes reference to the emerging Playing Pitch Strategy and Sports Facilities Strategy as key documents that will help to inform policy/decision making as well as identify priorities for enhancing off-site facilities if on-site provision is not a reasonable option. Sport England welcomes the reference to these up to date and robust evidence bases.	This support is welcomed.
24276	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Peter Graham [611]	I wish to express my disappointment that the key issues I raised at the last consultation have been totally ignored without explanation. Examples below: the application is premature as the master plan has not been adopted; phasing differs between documents; traffic assessment fundamentally flawed; traffic impact and congestion; drainage and sewers; relocating Westerfield station; cumulative impacts on air quality, noise and dust; open space and sports provision; poor and energy inefficient house designs; loss of trees, hedges, biodiversity and habitat; application likely to prejudice other IGS developments. By ignoring public concerns, IBC undermines confidence in local democracy.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. The master plan has been adopted as interim guidance to influence planning applications. Its adoption as a supplementary planning document will only be possible following the allocation of the entire site through this Core Strategy Review. Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan - this would include reference to sewerage. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications.
24277	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mrs Rani Pert [456]	I am disappointed that no answers have been forthcoming from the issues raised at the last consultation, and why the Borough have not bothered to answer these questions. It undermines public confidence in democracy? The main issues have been: increase in traffic, need for such a large development, lack of jobs and infrastructure, destruction of villages, effect on railway. Needs have changed now, with development to come near the Holiday Inn and on the sugar beet site. Tax payers money has been spent in acquiring this site on a loan? Develop it to pay back the loan.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications. Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan. Policy CS13 plans for jobs provision and DM34 for the separation of villages from Ipswich. The Wolsey Grange and former sugar beet factory sites are outside the Borough area and therefore outside the Council's jurisdiction as a local planning authority.
24279	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Alfred Wheeler [1084]	In March 2015 we submitted comments and it would appear that the Council has completely failed to address a substantial number of key issues including: Lack of any effective policies from co-operating with neighbouring authorities such as jobs and housing. The negative impact of the development of the Northern Fringe on traffic congestion, air quality and sewerage infrastructure. The failure to include the investment in the Sugar Beet located in a neighbouring authority which could impact favourably on jobs and homes growth strategies in Ipswich.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Housing and jobs needs and the Duty to Co-operate with neighbouring areas was addressed through the Stage 1 hearings held in March 2016. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications. The former sugar beet factory site is outside the Borough area and therefore outside the Council's jurisdiction as a local planning authority. However, any contribution it may make to meeting Ipswich's needs will be discussed through joint work planned across the Ipswich Policy Area.
24280	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	7 - CS7 The Amount of Housing Required	Mr Alfred Wheeler [1084]	The assessment of housing need does not reflect the most recent information.	Housing needs were addressed through the Stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
24281	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	12 - CS13 Planning Jobs for Growth	Mr Alfred Wheeler [1084]	The failure to address the severe obstacles to job growth identified by the viability testing report produced by Peter Brett Associates in December 2014 and the employment space requirements identified by the East of England Forecasting 2015 Model.	The Peter Brett viability testing of the Local Plan indicates that speculative economic development is not viable in Ipswich currently, but this is not caused by accumulating policy costs but by a lack of demand. Therefore some allocated sites could reasonably be developed with a pre-let or forward sale in place (CDL reference LPCD27). The requirements for B class floorspace have been considered through the Employment Land Needs Assessment (CDL reference PSDC10) which confirms that the Council is allocating sufficient land to meet employment needs.

24282	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Dr Jean Wheeler [362]	In March 2015 we submitted comments and it would appear that the Council has completely failed to address a substantial number of key issues including: Lack of any effective policies from co-operating with neighbouring authorities such as jobs and housing. The negative impact of the development of the Northern Fringe on traffic congestion, air quality and sewage infrastructure. The failure to include the investment in the Sugar Beet located in a neighbouring authority which could impact favourably on jobs and homes growth strategies in Ipswich.	The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the allocation, and its impacts. Housing and jobs needs and the Duty to Co-operate with neighbouring areas were addressed through the Stage 1 hearings held in March 2016. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications. The former sugar beet factory site is outside the Borough area and therefore outside the Council's jurisdiction as a local planning authority. However, any contribution it may make to meeting Ipswich's needs will be discussed through joint work planned across the Ipswich Policy Area.
24283	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	7 - CS7 The Amount of Housing Required	Dr Jean Wheeler [362]	The assessment of housing need does not reflect the most recent information.	Housing needs were addressed through the Stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
24284	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	13 - CS17 Infrastructure	Dr Jean Wheeler [362]	The failure to address the severe obstacles to job growth identified by the viability testing report produced by Peter Brett Associates in December 2014 and the employment space requirements identified by the East of England Forecasting 2015 Model.	The Peter Brett viability testing of the Local Plan indicates that speculative economic development is not viable in Ipswich currently, but this is not caused by accumulating policy costs but by a lack of demand. Therefore some allocated sites could reasonably be developed with a pre-let or forward sale in place (CDL reference LPCD27). The requirements for B class floorspace have been considered through the Employment Land Needs Assessment (CDL reference PSCD10) which confirms that the Council is allocating sufficient land to meet employment needs.
24285	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr & Mrs David and Eileen Warren [1104]	Complete failure by you to address the viability of the allocation of the Northern Fringe due to the impact of traffic congestion, air quality and lack of sewerage infrastructure. There is a clear and urgent need for you to address the congested roads and sewerage facilities that service the whole of Ipswich which will be greater if the Northern Fringe proceeds as anticipated by you	Policy CS10 identifies the need for infrastructure and indicates that it will be taken forward through an Infrastructure Delivery Plan - this would include reference to sewerage. Updated transport modelling and air quality modelling was published on 27th May 2016. Mitigation of any impacts would be taken forward through planning applications. In giving consideration to the proposed allocation of land at the Northern Fringe for new housing in the Ipswich Borough Council Core Strategy and Policies DPD, the highway authority (Suffolk County Council) took the view, based on modelling work at the time, that a phased development of up to 5000 dwellings at the Northern Fringe could be accommodated on the existing highway network without the need for new road building subject to a range of demand management and traffic management measures being introduced. More detailed Transport Assessments are required to be submitted as part of the detailed planning application submissions, which should cover in more detail the impacts on roads nearby and mitigation required for impacts such as rat runs and junction improvements. Potential mitigation is set out in more detail in the associated IGS SPD. The IGS SPD identifies strategic improvements to the sewerage system and water supply as being some of the infrastructure requirements identified and further investigation in that respect will be required as the details of the development evolve. The SPD is key to identifying and developing the detail of these issues. The SPD is specified in the revised CS10 policy and therefore gains greater weight once adopted.
24286	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	7 - CS7 The Amount of Housing Required	Mr & Mrs David and Eileen Warren [1104]	No evidence of compliance with the Localism Bill on effective policies and co-operation with adjacent Authorities on jobs and housing where you ignore up-to-date evidence on housing assessment.  Fail to take into account how financial investment in the sugar beet site will have on future jobs and homes in Ipswich. How the development of brownfield sites such as the former Volvo site, owned by the Council, and the 10acre nearby site owned by another, both immediately available for residential use, without negative input on employment. Both can be developed, without the need for redesigned roads, sewerage systems or cost to the Council.	Housing and jobs needs and the Duty to Co-operate with neighbouring areas were addressed through the Stage 1 hearings held in March 2016. The former sugar beet factory site is outside the Borough area and therefore outside the Council's jurisdiction as a local planning authority. However, any contribution it may make to meeting Ipswich's needs will be discussed through joint work planned across the Ipswich Policy Area. The Volvo Site IP058 and other sites on Sandhill Lane are not suitable for residential development because of their proximity to the sewage works. The Strategic Housing Land Availability Assessment (Core Document Library reference ICD11) indicates sites which have been considered for their suitability, availability and achievability for residential use.
24287	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	12 - CS13 Planning Jobs for Growth	Mr & Mrs David and Eileen Warren [1104]	No account has been taken of the Peter Bretts December 2014 Liability Testing Report and East of England 2015 Employment Space Requirement Model, which highlights the severe obstacle to jobs growth which clearly impact on housing needs in Ipswich and surrounding area.	The jobs target has been considered through the Stage 1 hearings which took place in March 2016. The Peter Brett viability testing of the Local Plan indicates that speculative economic development is not viable in Ipswich currently, but this is not caused by accumulating policy costs but by a lack of demand. Therefore some allocated sites could reasonably be developed with a pre-let or forward sale in place (Core Document Library reference LPCD27). The Local Plan looks fifteen years ahead for the delivery of jobs.
24288	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	Whole Pre-Submission Main Modifications Document	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Paragraph 3.4 of the Statement of Consultation does not accurately capture the issues raised, including the lack of effective policies and outcomes from the Duty to Co-operate. Concerned that the genuine concerns and issues raised by the public have been disregarded. Modifications do not reflect evidence of case law relating to congestion, air quality and affordable homes. The objectives can be categorised as muddled and sometimes in conflict, not measured and only aspirations. SOCS have no confidence the modifications will lead to 'more genuinely sustainable development or growth' (8.5). Balance between housing and jobs is not aligned (8.9).	The Statement of Consultation (CDL reference SUCD16) includes the Council's summary of the main issues raised through representations. However, the representation summaries are included as an appendix to the document and the Inspector also has a full set of the duty made representations. Therefore, no issues have been disregarded. The Pre-Submission Main Modifications have been proposed to improve how policies work or update them in relation to national policy changes. The Local Plan Examination will provide the forum in which to discuss the merits of the Ipswich Garden Suburb allocation, and its impacts. The Pre-Submission Main Modifications have also been subject to sustainability appraisal (please refer to Core Document Library reference SUCD9). The balance between housing and jobs growth has been considered through the Stage 1 hearings, which took place in March 2016.
24289	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	7 - CS7 The Amount of Housing Required	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Paragraph 3.4 of the Statement of Consultation does not accurately capture all of the issues raised. This includes issues raised in relation to the assessment of housing not being updated to reflect the most recent information available including the DCLG Household Projections 27th February 2015 and the ONS migration data. Concerned that the genuine concerns and issues raised by the public have been disregarded. CS7 will fail if the balance between jobs growth and housing are not aligned.	Please see above regarding the Statement of Consultation. The housing need for the Borough has been considered through the Stage 1 hearings, which took place in March 2016.
24291	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	12 - CS13 Planning Jobs for Growth	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Paragraph 3.4 of the Statement of Consultation does not accurately capture all issues raised, including in relation to addressing severe obstacles to growth identified by the viability report and the employment space requirements identified by the EEFM 2015. There has also been failure to consider how the acquisition of the sugar beet site will impact on jobs and homes growth strategies in the Borough. Concerned that the genuine concerns and issues raised by the public have been disregarded. CS1-CS6 may be undeliverable, therefore CS11-20 may be undeliverable. Too many imponderables will lead to likely non-delivery. Few solutions in the modifications.	Please see above regarding the Statement of Consultation. The Peter Brett viability testing of the Local Plan indicates that speculative economic development is not viable in Ipswich currently, but this is not caused by accumulating policy costs but by a lack of demand. Therefore some allocated sites could reasonably be developed with a pre-let or forward sale in place (Core Document Library reference LPCD27). The former sugar beet factory site is outside the Borough area and therefore outside the Council's jurisdiction as a local planning authority. However, any contribution it may make to meeting Ipswich's needs will be discussed through joint work planned across the Ipswich Policy Area.
24292	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	2 - CS2 The Location and Nature of Development (MOD 1)	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. The CS2 modification to accelerate and allocate the Northern Fringe in its entirety will not improve accessibility.	Not all of the policies CS1 to CS6 and CS11 to CS20 have been subject to modifications. Policy CS6 has been dealt with through the Stage 1 hearings. The other CS policies referred to will be discussed at the Stage 2 hearings, as will the merits of the Ipswich Garden Suburb allocation, and its impacts (please see Matter 5). The adopted versions of the policies have proved deliverable and the whole plan viability assessment (Core Document Library reference LPCD26 and 27) indicates that the plan is viable. The only Pre-Submission Main Modification proposed to policy CS2 is to add reference to community development to clause a. to ensure that major developments, whether high or lower density schemes, provide support for community development to promote wellbeing and social inclusion.
24293	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	4 - CS4 Protecting our Assets (MOD 1)	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The Greenways Project never had any input on CS10 area. There is omission on the data (SPD) which exists for NF and IGS. The modifications are more likely to compromise CS4. CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable.	The Council's Parks and Bereavement Service has had ongoing input into the planning of the Ipswich Garden Suburb. Please see above regarding the deliverability of the 'CS' policies. The Proposed Pre-Submission Main Modifications to CS4 strengthen references to the built heritage following discussion with Historic England, and add reference to protected and priority species to ensure compliance with the Biodiversity Duty. They are considered important to strengthen the policy, not compromise it.
24294	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	11 - CS11 Gypsy and Traveller Accommodation	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable.	Please see above regarding the deliverability of the 'CS' policies.
24295	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	33 - DM33 Green Corridors	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. Modification and weakening is unacceptable. Green rim and green corridors are vital and should not be compromised to please landowners/developers when so much net biodiversity loss is proposed. Open space deficits in the north, east and north-west Ipswich need addressing. DM33 should not be compromised due to landowner/developer pressure. Modification to accelerate and allocate Northern Fringe in entirety will lead to significant biodiversity loss, employment loss (agriculture) and irreversible loss of food growing land which is in conflict with CS1 and CS4.	Please see above regarding the deliverability of the 'CS' policies. The green corridors are important, and the aim of policy DM33 is to maintain, and where possible enhance, their corridor function. The modification makes this clear and clarifies that the policy is not intended to stop all development in the green corridors, which are shown schematically on Plan 6 (Core Document Library reference SUCD7). Development could provide the opportunity to link up sections of corridor in future. In relation to the Ipswich Garden Suburb, the Supplementary Planning Document provides more detail about the wildlife corridors and green corridors through the site, e.g. the Fonneareau Way, through the Landscape and Open Space Strategy for example (ICD55).
24296	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	13 - CS17 Infrastructure	Save Our Country Spaces (Mrs Barbara Robinson) [978]	CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable. A policy to reinstate the obligation on landowners/developers to contribute to road networks should be reinstated. The modification to accelerate and allocate the Northern Fringe in its entirety is likely to overwhelm IBC's limited remit, capacity and shrinking resources to deal with this in addition to service and infrastructure delivery for the existing and new population.	Please see above regarding the deliverability of the 'CS' policies. The Proposed Pre-Submission Main Modifications to CS17 have not changed references to highway infrastructure. They make necessary cross reference to the Habitats Regulations Assessment (HRA) mitigation strategy, which addresses Natural England's objection. The Proposed Pre-Submission Main Modifications to policy CS10 to strengthen references to comprehensive development will help to ensure the proper provision of infrastructure. Policy CS10 already requires the preparation of an Infrastructure Delivery Plan.
24297	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	15 - CS20 Key Transport Proposals	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Modification to accelerate and allocate the Northern Fringe in entirety is identified as causing unacceptable delays, congestion and health impacting pollution, a scenario recently explored in new case law and deemed unacceptable sustainable development. CS1 - CS6 may be undeliverable and therefore CS11-20 may be undeliverable.	Updated transport modelling and air quality modelling for the whole Local Plan was published on 27th May 2016 (CDL reference PSCD18). Mitigation of any impacts would be taken forward through planning applications.

24298	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	13 - CS17 Infrastructure	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Support the proposal to seek contributions to mitigate measures in the Habitats Regulations Assessment whether classed as infrastructure or not.	This support is welcomed.
24299	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	21 - DM10 Protection of Trees and Hedgerows	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Main modification - loss of assets in conflict with CS4.	The Pre-Submission Main Modification to policy DM10 is a clarification only. DM10 protects trees and hedgerows and aims to increase canopy cover, in accordance with policy CS4. In relation to the Ipswich Garden Suburb, the Supplementary Planning Document provides more detail about the protection of hedgerows and trees, e.g. through the Landscape and Open Space Strategy and reference to a green infrastructure network that will build on the existing asset of field hedgerows and trees (ICD55).
24302	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	Whole Pre-Submission Main Modifications Document	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Paragraph 3.4 of the Statement of Consultation does not accurately capture the issues raised, including the lack of effective policies and outcomes from the Duty to Co-operate. Concerned that the genuine concerns and issues raised by the public have been disregarded.	The Statement of Consultation (CDL reference SUCD16) includes the Council's summary of the main issues raised through representations. All the representations were read in compiling the list. The representation summaries are included as an appendix to the document and the Inspector also has a full set of the duty made representations. Therefore, no issues raised have been disregarded. The Local Plan Examination will provide the forum in which to discuss outstanding issues. The Duty to Co-operate has been considered through the Stage 1 hearings held in March 2016.
24303	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	7 - CS7 The Amount of Housing Required	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Paragraph 3.4 of the Statement of Consultation does not accurately capture all of the issues raised. This includes issues raised in relation to the assessment of housing not being updated to reflect the most recent information available including the DCLG Household Projections 27th February 2015 and the ONS migration data. Concerned that the genuine concerns and issues raised by the public have been disregarded.	Please see above regarding consideration of the issues raised. Housing needs were addressed through the Stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
24304	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Paragraph 3.4 of the Statement of Consultation doesn't accurately capture all issues raised. Concerned genuine concerns and issues raised were disregarded. This includes issues raised in relation to the allocation of the entire Northern Fringe which may not be deliverable due to severe traffic congestion, negative impact on air quality and lack of sewage infrastructure. Failure to address cumulative needs for key strategic infrastructure within the Borough including roads and sewage infrastructure.	Please see above regarding the Statement of Consultation. Transport modelling was undertaken in 2009 for the whole plan including 5,000 dwellings in north Ipswich (please see ICD48). It showed that no new road infrastructure would be needed to accommodate the planned growth. It has been updated to 2015 (published on 27th May 2016 - PSCD18). Whilst the update shows that junction capacities would be exceeded in certain locations potential mitigation is set out in more detail in the associated IGS SPD. The identification of detailed traffic impacts arising from development at Ipswich Garden Suburb and mitigation measures needed to address impacts would occur through the planning application process. The IGS SPD identifies strategic improvements to the sewerage system and water supply as being some of the infrastructure requirements identified and further investigation in that respect will be required as the details of the development evolve. The SPD is key to identifying and developing the detail of these issues. The SPD is specified in the revised CS10 policy and therefore gains greater weight once adopted. Policy CS10 identifies the need for infrastructure and indicates that delivery will be taken forward through an Infrastructure Delivery Plan - this would include reference to sewerage.
24305	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	12 - CS13 Planning Jobs for Growth	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Paragraph 3.4 of the Statement of Consultation does not accurately capture all issues raised, including in relation to addressing severe obstacles to growth identified by the viability report and the employment space requirements identified by the EEFM 2015. There has also been failure to consider how the acquisition of the sugar beet site will impact on jobs and homes growth strategies in the Borough. Concerned that the genuine concerns and issues raised by the public have been disregarded.	Please see above regarding the Statement of Consultation. The Peter Brett viability testing of the Local Plan indicates that speculative economic development is not viable in Ipswich currently, but this is not caused by accumulating policy costs but by a lack of demand. Therefore some allocated sites could reasonably be developed with a pre-let or forward sale in place (Core Document Library reference LPCD27). The former sugar beet factory site is outside the Borough area and therefore outside the Council's jurisdiction as a local planning authority. However, any contribution it may make to meeting Ipswich's needs will be discussed through joint work planned across the Ipswich Policy Area.
24306	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Stephen Pugh [1822]	Despite a torrent of submissions expressing concerns with the plans for the Northern Fringe no substantive changes have been made. Would be less objectionable if Council had sought to answer concerns.  The Council is hell-bent on maximising risks by allocating the entire Northern Fringe. The need for the development needs to be demonstrated in terms of housing, growth and other developments. Will become a commuter suburb to other towns and cities.  Enormous costs are about to be imposed on Ipswich residents by the reckless manner in which the development is being pursued.	The National Planning Policy Framework requires the Council to meet its full, objectively assessed housing needs for market and affordable housing. ... including identifying the key sites which are critical to the delivery of the housing strategy over the plan period (paragraph 47). The Ipswich Garden Suburb allocation through policy CS10 forms an important part of the housing land supply for the Borough (see policy CS7, and the housing trajectory in the Authority Monitoring Report, CDL reference ICD03a).
24307	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	2 - CS2 The Location and Nature of Development (MOD 1)	Marine Management Organisation (Susan Davidson) [1004]	Marine plans apply up to the mean high water springs mark, which includes the tidal extent of any rivers. Marine plans guide decision makers on development in marine and coastal areas. In 2014 the East Inshore and Offshore marine plans for the area north of Felixstowe were published, becoming a material consideration for public authorities. The MMO is currently developing marine plans for the South Inshore and Offshore Plan Areas. Where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on planning that involves coastline or tidal river.	The Orwell Estuary lies within the 'South East Inshore' area for which work is just getting underway with 'call for issues' events planned for July 2016. The Soundness Self-Assessment Checklist (CDL reference SUCD23) indicates how the Local Plan has been considered against the requirements of the UK Marine Policy Statement 2011.
24308	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	Mr Martin Hore [1420]	Object to the omission in the main modifications of CS10 any adequate recognition of the effect of the Garden Suburb on road congestion in west central Ipswich. There are discrepancies between the statements made by the Borough and County Councils in this regard.  It would appear that no robust assessment of the impact of the Garden Suburb on the highway network has been undertaken. This is an essential pre-requisite to the granting of consent.  No consent should be granted until at least a route and funding have been identified for a new northern road linking the Garden Suburb and A14.	Transport modelling was undertaken in 2009 for the whole plan including 5,000 dwellings in north Ipswich (please see ICD48). It showed that no new road infrastructure would be needed to accommodate the planned growth. It has been updated to 2015 (published on 27th May 2016 - PSCD18). Whilst the update shows that junction capacities would be exceeded in certain locations the identification of detailed traffic impacts arising from development at Ipswich Garden Suburb and mitigation measures needed to address impacts would occur through the planning application process. At present there is no evidence to justify requiring a northern link road, but the Council remains open to the possibility as outlined through policy CS20/paragraph 8.213.
24309	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	15 - CS20 Key Transport Proposals	Mr Martin Hore [1420]	Object to the omission in the main modifications of CS20 any adequate recognition of the effect of the Garden Suburb on road congestion in west central Ipswich. There are discrepancies between the statements made by the Borough and County Councils in this regard.  It would appear that no robust assessment of the impact of the Garden Suburb on the highway network has been undertaken. This is an essential pre-requisite to the granting of consent.  No consent should be granted until at least a route and funding have been identified for a new northern road linking the Garden Suburb and A14.	Transport modelling was undertaken in 2009 for the whole plan including 5,000 dwellings in north Ipswich (please see ICD48). It showed that no new road infrastructure would be needed to accommodate the planned growth. It has been updated to 2015 (published on 27th May 2016 - PSCD18). Whilst the update shows that junction capacities would be exceeded in certain locations the identification of detailed traffic impacts arising from development at Ipswich Garden Suburb and mitigation measures needed to address impacts would occur through the planning application process. At present there is no evidence to justify requiring a northern link road, but the Council remains open to the possibility as outlined through policy CS20/paragraph 8.213.
24310	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	2 - CS2 The Location and Nature of Development (MOD 1)	Gladman Developments (Mr Russell Spencer) [1437]	This change introduces a rather vague reference to 'community development' with no definition provided as to what this means in this context. This contravenes Â§154 of the (National Planning Policy) Framework. Clarity is important because this section of the policy outlines where new development will be focussed. It has a strong 'geographic' thrust, so it is unclear how the reference to supporting community development fits with this. The aim of ensuring that new development promotes wellbeing and social inclusion is already embedded within national policy.	Policy CS2 addresses both the location and nature of development. If new neighbourhoods are created which lack community meeting spaces or any form of community organisation or support, it can lead to social isolation amongst residents and does not support community cohesion. Therefore, the Pre-Submission Main Modification is aimed at ensuring that future major development, whether high or lower density schemes, provides support for community development to promote wellbeing and social inclusion, in accordance with the National Planning Policy Framework. This is fundamental to the social role of sustainable development, therefore, the Council considers it important to flag up the principle. The detail is provided through policy DM32, which requires the provision of community facilities and in paragraph 9.199 refers to a Community Management Plan being required in some instances.
24311	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	4 - CS4 Protecting our Assets (MOD 1)	Gladman Developments (Mr Russell Spencer) [1437]	We have concerns with the proposed modification, which refers to using planning obligations to 'secure the enhancement and promotion of the significance of any heritage asset'. Three tests for the use of planning obligations are set out in Regulation 122, Paragraph 2 of the CIL Regulations (as amended): A planning obligation may only constitute a reason for granting planning permission for the development if the obligation isâ€œ (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.	Paragraph 2 of the CIL Regulations (as amended) would apply to the securing of such planning obligations. It does not mean this potential use of planning obligations should not be flagged up. The modified policy sets out the Council's comprehensive approach to conserving and enhancing heritage assets in accordance with the National Planning Policy Framework paragraph 126.
24312	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	16 - DM1 Sustainable Design and Construction	Gladman Developments (Mr Russell Spencer) [1437]	The Deregulation Bill 2015 specifies that Councils cannot set any additional local technical standards relating to the construction, internal layout or performance of new dwellings other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings where these are supported by evidence of need and viability. Furthermore, Gladman would remind the Council to pay careful attention to the requirements set out in Â§173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that the plan from being delivered.	Whilst it is acknowledged that the Government no longer intends to proceed with Allowables Solutions, Regulation 43 of the Deregulation Act has not yet been commenced and there planning authorities are able to set standards for energy efficiency under the Planning and Energy Act 2008. The Background to the Requirement for Adaptable and Accessible Dwellings paper (CDL reference LPCD51) considers the viability of requiring adaptable and accessible dwellings, alongside the energy efficiency and water use requirements and concludes that the implications would not be dissimilar to the requirements for the Code for Sustainable Homes which was considered in the Whole Plan Viability Report (CDL reference LPCD26).
24313	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	34 - DM34 Countryside (MOD 1)	Gladman Developments (Mr Russell Spencer) [1437]	Concerned that the policy creates a 'presumption against development' in many areas between the existing built-up settlement of Ipswich and the borough boundary.  The second part of the policy sets out that proposals for development in the countryside should, amongst other things, 'maintain the separation between Ipswich and surrounding settlements'. Gladman believe that policies which seek to protect gaps between settlements are not consistent with the Framework. Gaps between settlements can be protected under Green Belt policy (it being one of the main purposes) but not through restrictive blanket countryside policies.	The Borough is underbounded and cannot meet its objectively assessed housing needs in full. This was discussed through the Stage 1 hearings held in March 2016. The Council's Matter 2 submission statement (Matter 2.3) together with the SHLAA (CDL reference ICD11) address the constraints which prevent areas identified as countryside from coming forward within this plan cycle. Other areas previously designated as countryside through the Local Plan have been allocated for development where appropriate, for example Ipswich Garden Suburb (policy CS10), Airport Farm Kennels (IP152/SP5) and Land North of Whitton Lane (IP140/SP5). Therefore the remaining areas of countryside are justifiably identified and protected as such to ensure against unsustainable, piecemeal development. The NPPF instructs that 'Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances' (paragraph 55) and the policy complies with this.

24314	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	4 - CS4 Protecting our Assets (MOD 1)	Boyer Planning (Mr Matt Clarke) [293]	The modification to Policy CS4 (Protecting our Assets) seeks to widen the scope of the protection that the policy offers to heritage assets by making specific reference to the maintenance of a list of buildings and other heritage assets of local importance, and taking steps to reduce the number of heritage assets at risk. Whilst the intentions of the Council to safeguard the historic environment are acknowledged and supported in principle, the modifications could place additional unnecessary restrictions upon development, particularly in relation to sites which are categorised as undesignated heritage assets.	Ipswich has a rich resource of heritage assets which are important in defining the town's character. The National Planning Policy Framework requires the Council to set out a positive strategy for the conservation and enjoyment of the historic environment (126). At Regulation 19 stage, Historic England objected that the policy was inadequate in this regard. Without the proposed Pre-Submission Modification, the policy does not set out the full range of actions the Council undertakes to sustain and enhance the significance of heritage assets. The NPPF also requires effects on non-designated assets to be taken into account (135). The Council has recently reviewed and updated the Local List and adopted it as a supplementary planning document (CDL reference ICD61). The detailed development management policy DM8 provides clear guidance on how development applications will be considered.
24315	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	20 - DM8 Heritage Assets and Conservation	Boyer Planning (Mr Matt Clarke) [293]	Policy DM8 (Heritage Assets and Conservation) has been modified in order to specifically include both Designated and Undesignated Assets. A number of additions are made to widen the scope of the policy. As with Policy CS4 above, whilst the intentions of the Council to safeguard the historic environment are acknowledged and supported in principle, this should not place additional unnecessary restrictions upon development, particularly in relation to key sites, such as the redevelopment of the Mint Quarter (with reference to site IP048).	Further amendments to policy DM8 have been agreed with Historic England through a statement of common ground (see the Council's Matter 8 statement) and these should alleviate the objector's concerns. With the further modifications agreed with Historic England, paragraph 3 of the policy would read as follows: The Council will resist the demolition or partial demolition of designated heritage assets as outlined in paragraph 133 of the National Planning Policy Framework. In relation to undesignated assets, the Council will have regard to the scale of any harm or loss and the significance of the heritage asset.
24316	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	28 - DM29 Provision of New Open Spaces, Sport and Recreation Facilities	Boyer Planning (Mr Matt Clarke) [293]	The modified policy appears to require contributions towards both on-site and off-site open space and facilities regardless of local circumstances. This could result in an over provision at a local level, which may unnecessarily reduce land available for other uses - particularly at a time when there is a need to significantly boost the housing land supply. It is also unclear how viability will be factored into the process. The NPPF paragraph 174 requires that the cumulative impact of standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle.	The Open Space, Sport and Recreation Study 2009 (CDL reference ICD43) assessed open space provision in Ipswich and proposed quantitative, qualitative and accessibility standards which were taken forward into the adopted Core Strategy. The Open Space and Biodiversity Policy (CDL reference ICD23) identifies the many benefits of greenspace in the urban environment, and indicates what the adopted open space standards mean for provision by Area Committee area of Ipswich. It shows that, in general, each area has a surplus of some types of open space, sport and recreation facility but a deficit of others. Where there is no quantitative shortfall, there may be qualitative or accessibility improvements that are needed to accommodate the extra usage likely to arise from new developments. The residents of most types of residential development will generate additional demands for open space, sport and recreation facilities. Any application that results in a net increase in the number of dwellings in the Borough will generate additional demands on existing facilities. A draft Public Open Space Supplementary Planning Document has also been prepared to support the implementation of policy DM29 and this may help to allay the objector's concerns. It was subject to public consultation January to March 2016 (CDL reference PSCD21). This indicates in the process flowchart for calculating provision (Section 4) that existing provision in the vicinity of the site would be considered, and project viability would be taken into account. Through the proposed modified policy and the draft SPD, the Council aims to provide a framework which allows the importance of urban greenspace to be weighed with the need to deliver sustainable development.
24317	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	1 - CS1 Sustainable Development - Climate Change	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We support the proposed change which ensures compliance with national policy. However, we are concerned that other elements of the policy, such as parts (a) and (b) remain unchanged despite being inconsistent with the thrust of national planning policy. Much of the narrative supporting the text is similarly unchanged. We have previously raised these concerns in representations and would have expected these to have been further reviewed in light of the government's stance.	This support is welcomed. Modifications have also been proposed to the reasoned justification as Pre-Submission Additional Modifications. These update references where necessary, such as those to Code for Sustainable Homes. Clauses a. and b. remain relevant to detailed policies DM1 and DM2.
24318	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	2 - CS2 The Location and Nature of Development (MOD 1)	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The proposed additional wording is ambiguous in its intent. Policies seeking to secure social cohesion would be better presented with a justification for that policy and clear means of implementing and monitoring policy requirements.	If new neighbourhoods are created which lack community meeting spaces or any form of community organisation or support, it can lead to social isolation amongst residents and does not support community cohesion. Therefore, the Pre-Submission Main Modification is aimed at ensuring that future major development, whether high or lower density schemes, provides support for community development to promote wellbeing and social inclusion, in accordance with the National Planning Policy Framework. This is fundamental to the social role of sustainable development, therefore, the Council considers it important to flag up the principle. The detail is provided through policy DM32, which requires the provision of community facilities and in paragraph 9.199 refers to a Community Management Plan being required in some instances. In relation to the Ipswich Garden Suburb, detailed provision has already been identified through policy CS10 and the Interim Guidance.
24319	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	3 - CS2 The Location and Nature of Development (MOD 2)	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We support the proposed change which recognises that the provision of infrastructure must be phased according to its need, and that blanket assumptions about the prior provision of infrastructure is not justified. However, much of the narrative supporting the text is unchanged meaning that the IGS continues to be described as if it were a subordinate part of the development strategy, rather than central to it, as is really the case.	This support is welcomed. Reading the plan as a whole, including CS2 clause a, CS7 and CS10, it is clear that the Ipswich Garden Suburb is a key component of the development strategy.
24320	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	6 - CS6 The Ipswich Policy Area	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We support the Council's recognition of the need for urgent action to address joint plan-making. However, the change is not sufficient, in itself, to demonstrate that the Plan is effective.	Please refer to the proposed amendments to CS6 arising from the Stage 1 hearings.
24321	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	7 - CS7 The Amount of Housing Required	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The proposed modification provides nothing more than a factual update on recent housing delivery but is in itself unclear and without clarity. The Plan remains unsound on the basis of a lack of up-to-date evidence.	Please refer to the proposed amendments to CS7 arising from the Stage 1 hearings.
24322	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	9 - CS10 Ipswich Garden Suburb	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The obligation to accord with the SPD should be expressed as general accordance, and the requirement to positively facilitate other development is not supported by national policy. (Note that the full representations contain different context text for CBRE SPUK III (No 45) Ltd and for Mersea Homes Ltd).	Given that the Ipswich Garden Suburb is a key component of the plan strategy, it is important that policy CS10 ensures that it can be delivered in its entirety and comprehensively, along with the necessary infrastructure.
24323	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	14 - CS17 / New 8.183	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We support the Council's ambition to set out a coordinated means of mitigating potential impacts of new development on sensitive receptors. However, flexibility is required to allow an appropriate and deliverable package of measures to be agreed in relation to relevant proposals.	This support is welcomed. The measures are to be identified and agreed through the joint HRA Mitigation Strategy, which is currently under preparation. In the meantime, mitigation will be identified through project level Habitats Regulations Assessments.
24324	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	13 - CS17 Infrastructure	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We support the proposed amendment.	This support is welcomed.
24325	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	16 - DM1 Sustainable Design and Construction	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The proposed modifications should provide for the deletion of references to the Code for Sustainable Homes but should not introduce any further policy requirements.	Whilst it is acknowledged that the Government no longer intends to proceed with Allowables Solutions, Regulation 43 of the Deregulation Act has not yet been commenced and there planning authorities are able to set standards for energy efficiency under the Planning and Energy Act 2008. The Planning Practice Guidance allows planning authorities to set water standards and accessible dwellings standards, in line with the Building Regulations optional standards.
24326	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	18 - DM5 Design and Character (MOD 2)	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The proposed policy requirement for optional building regulation standards is not justified nor have the viability implication of the policy been assessed or taken into account in formulating the policy. The proposed requirement should be deleted.	The proposed addition to the policy is justified through the note 'Background to Requirement for Adaptable and Accessible Dwellings' (CDL reference LPCD51).
24327	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	28 - DM29 Provision of New Open Spaces, Sport and Recreation Facilities	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The provisions of DM29 are not supported by a clear evidence base which should be made available in its entirety to allow the basis for the standards to be understood.	The provisions of policy DM29 are supported by the Open Space, Sport and Recreation Facilities Study 2009 (CDL reference ICD43), the Council's Open Space and Biodiversity Policy 2013 (CDL reference ICD23) and work undertaken to review the 2009 Study and update the standards (CDL reference PSCD22). A draft supplementary planning document has also been prepared to support the implementation of policy DM29 (CDL reference PSCD21) and this was subject to public consultation between January and March 2016.
24328	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	29 - DM30 9.181 / 9.192	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The additional policy requirements are not justified by evidence, and without that, should be deleted.	The reasoned justification proposed through the Pre-Submission Main Modifications states that the Council encourages the use of the space standards, it does not require them. The evidence is the same as that for the superseded reference to the English Partnerships standards and is as set out in the reasoned justification to the policy. It refers to the scale of growth planned in Ipswich, the role of flats in meeting growth requirements in the IP-One area and the need to ensure that new homes provide sustainable living accommodation. The whole plan viability testing took account of the size of units, based upon the average size of new units in the Borough (see Viability Testing of Ipswich Development Plan - LPCD26)
24329	Core Strategy and Policies DPD Review - Pre-Submission of Main Modifications	30 - DM31 / 9.187	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We support the proposed wording which would allow a wider range of development proposals to contribute towards Habitats Directive mitigation.	This support is welcomed.
<b>CORE STRATEGY REVIEW PROPOSED SUBMISSION STAGE (REGULATION 19)</b>					
5120	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Lawson Planning Partnership Ltd (Mrs Aarti O'Leary) [241]	NHS England (NHSE) wishes to re-state the objection raised at the previous consultation stage in respect to this policy. Specifically, NHSE objects to the limitation imposed by the policy on securing the direct provision of infrastructure by developers. The policy, as currently worded, would preclude the direct provision of infrastructure by developers, as it allows for mitigation to take the form of a commuted sum or CL payment only. By introducing a restriction in the way the impacts of development could be mitigated, the policy cannot be considered 'positively prepared', 'justified', 'effective' or 'consistent with national planning policy'.	This is not the intention of the policy and, therefore, a Pre-Submission Main Modification was proposed to add, '... or other mechanism as agreed with the Council' for clarity.

5121	Proposed Submission Core Strategy and Policies	10. Table 8B	Lawson Planning Partnership Ltd (Mrs Aarti O'Leary) [241]	NHS England (NHSE) objects to the inclusion of the health centre required to serve the proposed Garden Suburb as an infrastructure item to serve the southern neighbourhood only. The requirement for a new health centre is based on the overall growth to be accommodated within the Garden Suburb and, therefore, should be included as an item of strategic infrastructure. The omission of the health centre from the list of strategic infrastructure to serve the Garden Suburb is not 'positively prepared', 'justified', 'effective' or 'consistent with national planning policy' and, therefore cannot be considered 'sound'.	Policy CS10 is clear that the health centre is a facility for the whole development, listing it with the key, strategic components of the scheme. Table 8B identifies under the 'Strategic Infrastructure' heading, 'District and Local Centres ... alongside new health centre and reserved sites for community use.' It is listed within the Neighbourhood Infrastructure for the southern neighbourhood because this is where it is to be located, together with the District Centre. A detailed Infrastructure Delivery Plan required by policy CS10 will address how the facility will be delivered.
5124	Proposed Submission Core Strategy and Policies	8.106 (CS10)	Mr Peter Sharpin [1096]	Whilst I accept that this development will happen the current thinking is wholly wrong. It seems to assume that everybody will work in town, will travel by bus or cycle which is total nonsense and the infrastructure for a development of this size is not available.	The transport modelling which supports the local plan (2010 and updated 2016) (CDL references ICD48, ICD48b and PSCD18) does not indicate new road infrastructure such as a northern by pass is needed to support development at Ipswich Garden Suburb. Infrastructure needs are identified through policy CS10 and Table 8B. The policy requires the preparation of an Infrastructure Delivery Plan.
5125	Proposed Submission Core Strategy and Policies	8.109 (CS10)	Mr Peter Sharpin [1096]	The very reason the planning application was refused is lack of infrastructure. This does not appear to have changed.	The transport modelling which supports the local plan (2010 and updated 2016) (CDL references ICD48, ICD48b and PSCD18) does not indicate new road infrastructure such as a northern by pass is needed to support development at Ipswich Garden Suburb. Infrastructure needs are identified through policy CS10 and Table 8B. The policy requires the preparation of an Infrastructure Delivery Plan.
5128	Proposed Submission Core Strategy and Policies	8.213 (CS20)	clive gissing [160]	[Please read my full submission.] None of the transport problems identified under CS20 will be resolved by building a Northern Bypass, because a road built out beyond Westerfield is too far away. It would also blight villages and countryside. It will not relieve Star Lane or assist access to the docks. More beneficial would be an East Bank Town Centre Relief Road, and a new link from Tuddenham Road, through the garden suburb to Westerfield Road, Henley Road and the A14/Bury Road. A Northern Bypass would only help when the Orwell Bridge is closed on a few occasions each year.	The transport modelling which supports the local plan (2010 and updated 2016) (CDL references ICD48, ICD48b and PSCD18) does not indicate new road infrastructure such as a northern by pass is needed to support development at Ipswich Garden Suburb. However, the Council's position regarding a northern route is set out through policy CS20 / paragraph 8.213. This is that further investigation of the need for a northern route would be supported. Until this detailed work has been carried out, the potential impacts of such a route cannot be identified.
5129	Proposed Submission Core Strategy and Policies	8.182 (CS17)	Mr Shaun McConnell [1301]	I do not believe that there is sufficient joint working between IBC and SCC. For any development of the Northern Fringe to take place, a northern relief road must be put in place BEFORE development. Also, additional schools must be put in place BEFORE development. It will be no good having congested roads and extra 15 minutes on all journeys and no schools in place ready for when residents move in. And surrounding roads such as Borrowdale Avenue must have sufficient resource available for traffic calming. And where are all the proposed jobs coming from to warrant this plan.	The Duty to Cooperate has been considered through the Stage 1 hearings held in March 2016. The transport modelling which supports the local plan (2010 and updated 2016) (CDL references ICD48, ICD48b and PSCD18) does not indicate new road infrastructure such as a northern by pass is needed to support development at Ipswich Garden Suburb. However, the Council's position regarding a northern route is set out through policy CS20 / paragraph 8.213. This is that further investigation of the need for a northern route would be supported. Until this detailed work has been carried out, the potential impacts of such a route cannot be identified. Infrastructure needs are identified through policy CS10 and Table 8B. The policy requires the preparation of an Infrastructure Delivery Plan which would deal with the sequencing of development and infrastructure provision.
5130	Proposed Submission Core Strategy and Policies	8.213 / CS20	Mr Shaun McConnell [1301]	Exploration and feasibility and build of a Northern Bypass is essential PRIOR to proceeding with this plan. It is insufficient to say "council will actively encourage key partners". It must be explored prior to development of Northern Fringe and enacted via section 106 requirements. Recent data shows an increase of 15 minutes on journey time coming from Northern Fringe development alone, nevermind other areas. Current Government Transport Minister has visited Ipswich and recognises a northern relief road/bypass is required, as has Ipswich MP Ben Gummer and countless representations including neighbourhood watch committees and multiple comments on this issue.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5131	Proposed Submission Core Strategy and Policies	8.159 (CS15)	Mr Shaun McConnell [1301]	Ensure build of school PRIOR to house development on Northern Fringe so residents have a school for children from the outset	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5132	Proposed Submission Core Strategy and Policies	8.214 (CS20)	clive gissing [160]	Do not drop the idea of an East Bank Relief Road as this is a better solution to traffic problems identified than a Northern Bypass. Consider an alternative route to the original plan to avoid the two main obstacles. Could extend it to a full Town Centre Relief Road/Orwell Bridge Bypass.	The Council addresses this through policy CS20/paragraph 8.214 of the plan. Whilst the possibility of a road is not dismissed, it is unlikely to be deliverable within the plan period.
5133	Proposed Submission Core Strategy and Policies	DM8 - Heritage Assets and Conservation	Suffolk Preservation Society (Bethany Phibedg) [1352]	Support but require changes. DM8 refers to proposals to listed buildings which may affect the fabric or setting of the building. The setting of listed buildings can also be impacted by proposals to nearby unlisted buildings - also covered by the statutory duty set out in para 9.66 - a policy which aims to 'protect our assets' should reflect this.	The Council proposed a Pre-Submission Main Modification to policy DM5 clause e. to address this concern.
5134	Proposed Submission Core Strategy and Policies	DM9 - Buildings of Townscape Interest	Suffolk Preservation Society (Bethany Phibedg) [1352]	Support but require changes. The policy should be expanded. Policy DM9 refers to Buildings of Townscape Interest. The NPPF para 135 refers to non-designated heritage assets which could include features other than buildings such as a monument or important view - these can also be included on a local list. Their importance can be due to social/historical interest and should not be restricted to that of townscape interest.	The Council proposed a Pre-Submission Main Modification to policy DM9 / paragraph 9.75 to address this concern.
5137	Proposed Submission Core Strategy and Policies	8.63 (CS5)	The Ipswich Society (Michael Cook) [245]	Support but require changes. The Ipswich Society supports these admirable objectives. However, the Borough is frustrated in achieving its laudable aims because it does not have full ownership of the governance and financing of travel plans. The Policy must, therefore be more explicit and firmer in delineating our aims.	In combination with detailed policy DM17, policy CS5/paragraph 8.63 ensures that land use planning measures will, as far as possible, increase people's sustainable travel options.
5138	Proposed Submission Core Strategy and Policies	8.69 (CS6)	The Ipswich Society (Michael Cook) [245]	Support but require changes. We fully support the Ipswich Policy Area and insist that it becomes more active in supporting policies that effect the greater economic area and putting forward factual support for cross boundary developments and for infrastructure improvements. Frequent reports now instituted, must contain firm planning proposals	The Duty to Cooperate has been considered through the Stage 1 hearings held in March 2016. Amendments are proposed to policy CS6 as a result - please see the Council's submissions to Matter 3.
5139	Proposed Submission Core Strategy and Policies	8.76 (CS7)	The Ipswich Society (Michael Cook) [245]	Support but require changes. It is good to see that the majority of the housing new builds will take place on Previously Developed Land, apart from the Ipswich Garden Suburb. It is disturbing that 4051 of the 10,585 needed by 2031 have no identified site. It would be helpful to add in the figures from Ipswich Travel To Work Area to shed light on the contribution from the other authorities in the IPA to our housing problem.	The housing requirement and how it will be met have been considered through the Stage 1 hearings held in March 2016. Amendments are proposed to policy CS7 as a result - please see the Council's submissions to Matter 3.
5140	Proposed Submission Core Strategy and Policies	8.89 (CS8)	The Ipswich Society (Michael Cook) [245]	Support but require changes. Unarguably, the biggest need is for small starter homes; however, it is vital to recognise that to increase the overall affluence of the town, its employment attractiveness and economic activity, this section must ensure that there is sufficient "executive" style housing.	The aim of the policy is to ensure that a mix of dwelling types is delivered.
5141	Proposed Submission Core Strategy and Policies	8.95 (CS8)	The Ipswich Society (Michael Cook) [245]	Support but require changes. The Society would like to see the Policy lay down a proportion or number of in Self Build, Custom Build and Co-Housing developments in proposals of, say, 50 or more units.	Until the Council knows the level of interest locally in these forms of provision, it would not be practicable to specify proportions. The Council has set up a self-build register which enables people to register their interest.
5142	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	The Ipswich Society (Michael Cook) [245]	Support but require changes. We believe that the target percentage should stated in this statement; we suggest 35% in the period 2014 to 2031.	The National Planning Policy Framework (Paragraph 111) does not require local planning authorities to set a brownfield target. The plan prioritises brownfield development through policy CS9 but has to recognise that, as the plan period progresses, greenfield development will become more significant. Housing delivery 2001-2011 has been 94.5% on previously developed land, and 2011-2015 79%. However, from 2015 to 2031 this proportion is expected to decrease to 52.3% (see Table 4 of policy CS7).
5143	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	The Ipswich Society (Michael Cook) [245]	Support but require changes. The Society has always accepted the necessity in due course of the development of these green fields for residential use. It is mandatory that the developers understand the land uses as set out and the requirement for infrastructure and multi-modal transport provision before consideration is given to any application. Additionally, there should be a paragraph reiterating the parameters of good and sustainable design; we must insist on an exceptional architectural statement on this site.	The Local Plan already sets out strong design policies (CS2 and DM5 for example) and therefore the requirement for high quality design does not need to be repeated within policy CS10.
5144	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	The Ipswich Society (Michael Cook) [245]	Support but require changes. We have been unhappy that so many developers have reduced their affordable housing commitment, largely on the grounds of non-viability; we support strongly the independent review system. We feel that the wording here needs to be stronger to ensure developers compliance. We should like to see more transparency over such negotiations.	The wording is considered appropriate to secure this. The policy outlines that the Council will only consider reducing the target level where the developer complies with the approach as set out.
5145	Proposed Submission Core Strategy and Policies	8.213 (CS20)	The Ipswich Society (Michael Cook) [245]	Whilst in support of all the aims of this CS, we are not in agreement with the recent recrudescence of support for a Northern By pass. This is unnecessary in normal times as the current A14 and A12 problems can be solved by re-engineering the two trunk routes and upgrading of the Felixstowe branch line. It is a distraction to more sensible, cheaper and sustainable solutions. However, it is worthwhile to explore the possibility of a Northern Relief road in association with the Ipswich Garden suburb.	No decision has been made about the principle or detail of any Northern Bypass at this stage. That decision would not rest with the Borough Council. The Council is simply encouraging the Highway Authority and neighbouring councils to explore the possibility and practicalities of some form of northern route.
5146	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	The Ipswich Society (Michael Cook) [245]	Support but require changes. Two more bridges should be in the Transport Proposals. Firstly, a pedestrian and cycle bridge across the Gipping from the Elton Park site to Boss Hall and the Sugar Beet Factory site and secondly, across the railway to connect the Felixstowe Road "Coop" area and the Foxhall road area. Both of these would improve porosity and encourage walking and cycling where the alternative route is so long that inevitably people will drive. If included in a Policy document now, it will be easier for future planners to insist on them in future applications.	Both proposals are already included in the plan through policy SP9.

5147	Proposed Submission Core Strategy and Policies	4.1		clive gissing [160]	CS is unsound and should not be adopted. IBC has not demonstrated effective work with neighbouring Local Authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill. IBC should provide evidence that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council, else it will have failed in its duty to co-operate. It should explain in the CS how this strategic purchase aligns with the employment and housing growth strategies and targets.	The Duty to Co-operate was considered through the stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
5148	Proposed Submission Core Strategy and Policies	DM17 - Transport and Access in New Developments		clive gissing [160]	Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution fresh water and wastewater. As such the plan will not be effective and is unsound. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation methods can be implemented. Freshwater and wastewater infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5149	Proposed Submission Core Strategy and Policies	DM31 - The Natural Environment		Ipswich Wildlife Group (Mr Steve Pritchard) [1164]	Ipswich Wildlife Group agrees that the protection and enhancement of the natural environment in Ipswich is an important aspect of the overall life of the town. We think that the idea of the Ecological Network is an excellent one, and the plans set out for establishing it are very promising - we are already working with Greenways to promote the network in local communities. We are pleased to see that IBC will seek to conserve and enhance County Wildlife Sites and Local Wildlife Sites, in addition to the sites that have statutory protection (e.g. SSSIs, SPAs).	This support and contribution to the network is welcomed.
5150	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb		clive gissing [160]	It is unsound to allocate the entire Ipswich Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The Council's population forecast should not be based on a high immigration scenario, which is inconsistent with the policies of all main political parties.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5151	Proposed Submission Core Strategy and Policies	4.4		Parliament (Mr Ben Gummer) [1404]	IBC has not co-operated in any substantive way with its neighbouring authorities or with SCC. The relationship is profoundly dysfunctional. SCC's objections to the emerging IGS have not been accounted for in this document. The Ipswich Policy Area Board is a talking shop. The Inspector should ask neighbour authorities and SCC about their experience of IBC's co-operation to gauge whether this policy and its accompanying appendix bears any relationship with reality.	The Duty to Co-operate was considered through the stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
5152	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:		clive gissing [160]	Without properly defined specific and measurable jobs growth objectives the CS is unsound. To improve clarity and effectiveness 2 jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators should be specified.	Objective 3 of the plan and policy CS13 set out the jobs target for Ipswich Borough. It would be beyond the remit of the Ipswich Local Plan to set out jobs targets for neighbouring districts. Chapter 11 of the Core Strategy Review sets out the monitoring framework for the plan which includes employment development.
5153	Proposed Submission Core Strategy and Policies	5.4		Parliament (Mr Ben Gummer) [1404]	Deprivation in Ipswich also arises from poor education, poor transport links and poor planning decisions by the Borough Council.	It is clear that the factors mentioned in 5.4 are not an exhaustive list. Deprivation is complex - the point being made in 5.4 is that often it is combinations of factors which are important.
5154	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth		clive gissing [160]	Without properly defined specific and measurable jobs growth objectives the CS is unsound. To improve clarity and effectiveness 2 jobs targets are required: one for the Borough and one for outside. Measurement indicators should be specified. A recent report by Peter Brett Associates calls into question the viability of developing new offices, industrial units, warehousing and large retail offerings within Ipswich. This challenges the ability of the CS to deliver the massive jobs growth target. For soundness the CS needs to address the severe obstacle to growth identified and produce a specific and realistic jobs target for Ipswich Borough.	Objective 3 of the plan and policy CS13 set out the jobs target for Ipswich Borough. It would be beyond the remit of the Ipswich Local Plan to set out jobs targets for neighbouring districts. Chapter 11 of the Core Strategy Review sets out the monitoring framework for the plan which includes employment development. The Peter Brett report (CDL references LPCD26 and 27) concludes that speculative employment development is not currently viable in Ipswich but that some allocated sites could reasonably be developed with a pre-let or forward-sale in place and Regional Aid may also be available to address viability.
5155	Proposed Submission Core Strategy and Policies	5.7		Parliament (Mr Ben Gummer) [1404]	The City Deal was agreed between a wider group of parties than simply Ipswich, including SCC, BDC, MSDC, SDCD and NALEP.	The Council has a Pre-Submission Additional Modification to address this point.
5156	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:		clive gissing [160]	The housing target Objective 3(a) is so poorly defined as to be ineffective and as such the CS is unsound. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and progress measured.	The objectively assessed housing need for Ipswich was considered through the stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
5157	Proposed Submission Core Strategy and Policies	6.7 The Vision		Parliament (Mr Ben Gummer) [1404]	This vision contradicts the preceding statement in 6.3. The vision is anodyne and non-specific.	The Council considers that the vision is aspirational and locally specific and that the plan's objectives are consistent with it.
5158	Proposed Submission Core Strategy and Policies	6.7 The Vision, f:		Parliament (Mr Ben Gummer) [1404]	The Borough needs to explain how its recent purchase of the Sproughton Sugar Beet site, not in the Borough boundary but within the broader remit of this document, corresponds with their strategy for strategic employment sites.	The Council has purchased the site and intends to redevelop the site as a strategic employment site. To this end a masterplan for the redevelopment of the site is being progressed in full consultation with other stakeholders. It should be noted that Ipswich Borough Council is not the planning authority for the former sugar beet factory site, this rests with Babergh District Council. Babergh's adopted Core Strategy sets out clearly the land use planning approach to the former sugar beet factory site at Policy CS8 (Sproughton Strategic Employment Site Allocation). The strategy for Ipswich Borough's strategic employment site at Futura Park is explained in the explanatory text to the policy, paragraphs 8.138 to 8.140.
5159	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb		clive gissing [160]	The CS cannot guarantee the delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat, namely the Stour and Orwell Estuary Special Protection Area. For soundness policy CS10 and Infrastructure Table 8B need to be revised. The Country Park and green areas need to be established before building starts as it takes a long time for such habitats to mature. If this doesn't happen then there will be no 'Garden' part of the promised 'Garden Suburb' for at least 20 years.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5160	Proposed Submission Core Strategy and Policies	6.7 The Vision, g:		Parliament (Mr Ben Gummer) [1404]	The growth of the university should not be defined by the borders of the Education Quarter or new campus.	Education uses would not be restricted only to the Education Quarter, they would be considered on their merits outside it. However, identifying the Quarter ensures that some land is protected for university-related uses, to allow the institutions to expand as and when they need to.
5161	Proposed Submission Core Strategy and Policies	8.28 (CS2)		clive gissing [160]	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land	The National Planning Policy Framework (Paragraph 111) does not require local planning authorities to set a brownfield target. The plan prioritises brownfield development through policy CS9 but has to recognise that, as the plan period progresses, greenfield development will become more significant. Housing delivery 2001-2011 has been 94.5% on previously developed land, and 2011-2015 79%. However, from 2015 to 2031 this proportion is expected to decrease to 52.3% (see Table 4 of policy CS7).
5162	Proposed Submission Core Strategy and Policies	10: Table 8B		Ipswich Wildlife Group (Mr Steve Pritchard) [1164]	Re: Country Park with joint visitor / community centre for Henley Gate. - Trigger point for delivery: Henley Gate is the last of the 3 areas to be developed and so up to 2000 houses might be in place before a single tree is planted in the Country Park. This would put pressure on other existing greenspaces, including the Stour and Orwell Estuaries SPA. We think that a start should be made on the Country Park as soon as the first house is started in the first area.	The country park is associated with the Henley Gate neighbourhood and its provision will need to be related to commencement of development on this site. The triggers have been set at the earliest point considered viable for the development to provide and an earlier point for tree planting and landscaping has been included as part of the trigger to enable landscaping to establish prior to the park opening. The SPD notes the need for IBC to develop a brief for the Country Park in consultation with relevant stakeholders (para 4.10). More details as to how infrastructure will be funded and delivered will be set out within an Infrastructure Delivery Plan which would be considered alongside planning applications and used to secure the necessary contributions at the appropriate points in the development.
5163	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:		Parliament (Mr Ben Gummer) [1404]	This level of housing allocation cannot be supported without new infrastructure, little of which is identified in this document.  The affordable housing target for the IGS is unrealistic and is not the current target being discussed with developers, so should be omitted as misleading.	Infrastructure needs have been identified in policy CS10 and Table 8b along with indicative trigger points which take into account when infrastructure is needed and when it is viable to deliver. An initial viability assessment has been undertaken which demonstrates that affordable housing target is broadly achievable. More detailed and informed viability assessments will be submitted with the planning applications and policy CS12 allows for flexibility in affordable housing levels where there is demonstrated need to do so.
5164	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development		clive gissing [160]	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land	Please see above the Council's response to representation 5161.
5165	Proposed Submission Core Strategy and Policies	6.18		Parliament (Mr Ben Gummer) [1404]	The extension of the central retail area is opposed by Ipswich Central, which represents town centre retailers. They propose contracting the central retail area to take account of changed shopping habits and concentrate the shopping district in a smaller area, running from the Waterfront to Christchurch Park. This document directly contradicts their plan, which also has the support of SCC.  Moreover, IBC should declare its financial interest in seeking to extend the central shopping area, as it would involve land owned by IBC.	The Ipswich Central vision is aspirational and the Council needs to weigh aspiration with deliverability. The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime plot of Tavern Street-Westgate Street. The Council remains committed to developing a stronger north-south axis for the town centre and Waterfront but considers that this could be achieved through uses in the Merchant Quarter including office, leisure and residential. This would help to create footfall and vibrancy and provide attractive, safe, overlooked routes. The Council will continue to work with town centre partners to deliver the Master Plan's vision.
5166	Proposed Submission Core Strategy and Policies	8.25 (CS1)		Parliament (Mr Ben Gummer) [1404]	The document does not describe an objective for the renewal and new planting of street trees.	Policy DM10 already sets out a requirement to increase the town's canopy cover, and Policy DM5 requires the design of development to ensure 'greener streets and spaces ...'. These policies in combination cover the planting of street trees in the context of development proposals.



5168	Proposed Submission Core Strategy and Policies	8.104 (CS10)	Parliament (Mr Ben Gummer) [1404]	There are still significant areas of derelict and/or underutilised land in the town centre which need to be better recognized in this document.	The plan strategy set out in policy CS2, CS3 and CS9 clearly prioritises the redevelopment of urban brownfield sites, but it also recognises that some greenfield development will be necessary to meet the objectively assessed housing need.
5169	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Parliament (Mr Ben Gummer) [1404]	The location of the secondary school is erroneous and does not contribute to sustainable travel patterns.	The SPD has taken forward the position of the Secondary School on the Red House site, following an Issues and Options assessment which looked at different distributions of land uses including the Secondary School being located in each of the three neighbourhoods. This was then consulted upon and on the basis of the feedback received Option 2 which identified the Secondary School on the Red House site would form the basis of the SPD. The SPD was approved as interim guidance by the Council in September 2014. It is also worth noting that the location of the Secondary School is now supported by Suffolk County Council as education authority.
5170	Proposed Submission Core Strategy and Policies	8.105 (CS10)	Parliament (Mr Ben Gummer) [1404]	The scale of housing indicated in this document is unsustainable without significant new road, cycle and pedestrian infrastructure.	The SPD which supports the allocation of the IGS includes transport options and infrastructure requirements for improvements to cycle / pedestrian connections.
5171	Proposed Submission Core Strategy and Policies	8.108 (CS10)	Parliament (Mr Ben Gummer) [1404]	No new roads other than those actually in the new development are indicated in the SPD.	Paragraph 8.108 sets out infrastructure requirements identified to support the development. The majority of items noted in this paragraph are located within the site including new roads.
5172	Proposed Submission Core Strategy and Policies	8.109 (CS10)	Parliament (Mr Ben Gummer) [1404]	Subsequent traffic modelling by the applicants and by SCC invalidate the previous assumptions upon which the Secretary of State made his previous judgement.	The infrastructure conclusions from the 2010 appeal decision are reflected in the policy. The infrastructure requirements listed are based on advice from SCC and other evidence / planning judgements on what is necessary to support the development.
5173	Proposed Submission Core Strategy and Policies	8.121 (CS12)	Parliament (Mr Ben Gummer) [1404]	The target for social rented housing is so high as to exclude meaningful numbers of other forms of affordable housing, especially shared equity.	The target level for social and affordable rent is at least 80% of overall provision. This best reflects the need for low cost housing in the Borough.
5174	Proposed Submission Core Strategy and Policies	8.124 (CS12)	Parliament (Mr Ben Gummer) [1404]	This affordable housing target bears no relation to the numbers being discussed with developers, nor indeed to statements made by cabinet members at Executive. It is misleading.	The affordable housing target generally accords with that which has been secured in recent planning applications and that which has shown to be viable in the independent whole plan viability review.
5175	Proposed Submission Core Strategy and Policies	8.150 (CS14)	Parliament (Mr Ben Gummer) [1404]	See above objections to the increase in size of the central shopping area.	The proposed amendments to the Central Shopping Area reflect the proposed allocation of the Westgate site which reflects the recommendations of the 2013 DTZ report. The removal of parts of the eastern part of the Central Shopping Area reflect the proposals for the Mint Quarter.
5176	Proposed Submission Core Strategy and Policies	8.162 (CS15)	Parliament (Mr Ben Gummer) [1404]	This section fails to take account of the report by Frank Field and Naomi Eisenstadt to SCC on the function and location of children's centres.	Children's centres are the County Council's responsibility and the report was used to inform decisions about future provision. Nevertheless the Borough Council is working closely with the County Council to plan for future early years provision.
5177	Proposed Submission Core Strategy and Policies	8.177 (CS17)	Parliament (Mr Ben Gummer) [1404]	This statement is not complete without recognizing the pressures on existing road infrastructure caused by development at Ravenswood, which is now requiring remedial action by SCC.	Ravenswood has successfully delivered housing, a district centre and community facilities. The Local Plan proposals are supported by evidence from the Ipswich Transport Model 2010, updated in 2016, which indicated that no new road infrastructure was needed to support the plan's land use proposals (Core Document Library references ICD48 and 48b, PSD18).
5178	Proposed Submission Core Strategy and Policies	8.200 (CS20)	Parliament (Mr Ben Gummer) [1404]	This document and no other IBC document has any substantive policy for cycle or pedestrian infrastructure. These statements of intent are meaningless without it.	Many of the site allocations require the provision of improved cycle and/or pedestrian links, and specific infrastructure includes the provision of a cycle/pedestrian bridge to the Island site, safeguarding land to provide pedestrian/cycle bridge to the river path from Elton Park and a number of improvements identified under SP9 and SP15 of the Site Allocations plan. The Cycle Strategy Supplementary Planning Document will set out guidance for enhancing provision for cycling as part of new development as well as enhancements across the Borough. However, for completeness the Council proposed a Pre-Submission Main Modification to policy CS20 and paragraph 8.208, relating to cycling and walking, to link through to the detailed policies in the Site Allocations Plan.
5179	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Parliament (Mr Ben Gummer) [1404]	There is no support here for the following key infrastructure policies which will profoundly affect Ipswich: - upgrade of the GEML - upgrade of the A12 - upgrade of the A14	These projects will affect Ipswich but there is no known direct land use requirement associated with them. The Felixstowe to Nuneaton rail line improvements mentioned in CS20 were linked to the safeguarded land for the Ipswich rail chord, which is now in operation.
5180	Proposed Submission Core Strategy and Policies	8.205 (CS20)	Parliament (Mr Ben Gummer) [1404]	Highway capacity in the town centre is a function of town centre growth and local traffic flows and is only affected by the Orwell Bridge or A14 when either is closed. This statement is misleading, therefore.	The statement refers to the wider transport network and, whilst it mentions the A14 and Orwell Bridge, it clearly does not refer exclusively to these elements of the network.
5181	Proposed Submission Core Strategy and Policies	8.209 (CS20)	Parliament (Mr Ben Gummer) [1404]	First stage Local Growth Plan funding has now been secured to study the feasibility of the Wet Dock Crossing.	The announcement was made following publication of the plan. Therefore, the Council proposed a Pre-Submission Additional Modification to add reference to the feasibility study.
5182	Proposed Submission Core Strategy and Policies	8.213 (CS20)	Parliament (Mr Ben Gummer) [1404]	This paragraph is factually inaccurate on a number of levels: - A Wet Dock Crossing is not an alternative to a northern bypass, which addresses different traffic pressures. - A northern bypass is principally needed to relieve local traffic congestion in north Ipswich resulting from planned housing development, not from very very disruptive but occasional closures of the Orwell Bridge. - Modest proposals for a northern bypass could be accommodated partially or entirely within the Borough boundary.	The paragraph addresses east-west movement within the highway network across the whole town. Paragraph 8.205 sets the context, which links issues within the town centre with issues on the strategic route network. Traffic modelling work published in 2010 and updated in 2016 (Core Document Library references ICD48 and PSD18) does not indicate that a northern bypass is needed to enable the development proposed through the Local Plan to be delivered.
5183	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Stella Day [1407]	Residents object to the CS without proper consideration of the impact on transport infrastructure and the potential negative consequences of this on our road and the surrounding area.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5189	Proposed Submission Core Strategy and Policies	8.85	Parliament (Mr Ben Gummer) [1404]	Although the needs of an ageing population are identified in this section, there are no specific policies about the provision of sheltered or very sheltered accommodation close to the town centre to enable continued living for older people and people with restricted mobility all without access to cars.	Sites are allocated for residential use in the town centre through the Site Allocations Plan. These may be used for such accommodation. Paragraph 4.10 of the Site Allocations Plan acknowledges that housing is a key issue for older people. The Proposed Pre-Submission Main Modification also addresses the provision of accessible and adapted dwellings.
5191	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Vicki Limer [1400]	The policy to allocate all of the Northern Fringe for development at once is unsound. Brownfield should be preferred for development but there is no brownfield target for development. Both the stated policy to release such a large amount of greenfield land for development at once and no firm target for accompanying brownfield development is unsound environmentally. Also there is a risk that such a large amount of development will not be delivered in the timescale of the plan and may result in piecemeal delivery and which would have damaged the natural environment in the Northern Fringe.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5192	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mrs Vicki Limer [1400]	This policy is unsound as regards development of Ipswich Garden Suburb as mentioned. The Core Strategy seeks to allocate all designated land for development within the plan period before the detailed design and agreement of the supporting infrastructure. Of particular concern is the lack of definition of the required road development. It is unrealistic to build 3500 homes and expect the current Hanley/Westerfield/Tuddenham & Colchester road system to accommodate the extra traffic. There will be a huge negative impact on traffic levels in this area on all local residents.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5193	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Environment Agency (Lizzie Griffiths) [1021]	Support but require changes. We support this approach of dispersing green open space through the town and providing an ecological network of green corridors. When incorporated into developments, these areas can have other functions, such as providing space for SuDS features, which help to both reduce flood risk and protect water quality. We consider it would be beneficial to include these benefits within the text of this policy.	The strategic green space policy, CS16, refers to flood risk management in relation to green space and therefore it is not needed in CS2 also.
5194	Proposed Submission Core Strategy and Policies	8.45	Environment Agency (Lizzie Griffiths) [1021]	Support but require changes. We support this reference to the legislation and policy protecting natural assets. However, we consider that the Water Framework Directive should be included in list, as an important piece of legislation for the protection of waterbodies, which can have an indirect impact on EU Habitats Directive and Ramsar sites.	Pre-Submission Additional Modifications have been proposed which add the Water Framework Directive to the list at 8.45 and an explanation to paragraph 8.50, to address these points.
5195	Proposed Submission Core Strategy and Policies	8.5	Environment Agency (Lizzie Griffiths) [1021]	Support but require changes. We support the inclusion of this paragraph, which discusses the importance of ecological networks in conserving important habitats and helping to provide resilience to pressures such as climate change. We are pleased to note that the Council recognises its biodiversity responsibility under the Natural Environment and Rural Communities Act 2006 and recommend that the Council's responsibilities under the Water Framework Directive are also recognised in this section.	Please see above.
5196	Proposed Submission Core Strategy and Policies	8.186	Environment Agency (Lizzie Griffiths) [1021]	We support Policy CS18, which demonstrates the Council's intention to work with partners, such as ourselves, to implement the Ipswich Flood Defence Strategy. We would suggest that the wording in this paragraph is amended to read - 'the tidal surge barrier is unlikely to be in place until the end of 2017'. This amendment should be reflected in other areas of the Local Plan where the completion date is given.	A Pre-Submission Additional Modification has been proposed to paragraph 8.186 to address this point.
5197	Proposed Submission Core Strategy and Policies	DM4 - Development and Flood Risk	Environment Agency (Lizzie Griffiths) [1021]	We are very supportive of Policy DM4 We are pleased to note that the policy ensures that new development does not increase flood risk overall from any form of flooding. We consider that the policy could mention that the benefits of using SuDS include both flood risk and water quality. Given the future of Suffolk County Council, as Lead Local Flood Authority, in surface water management, we would recommend you ensure that the County Council have been consulted on the wording of this policy.	The Council has Duty to Co-operate with Suffolk County Council and has consulted the County Council on the policy wording.

5198	Proposed Submission Core Strategy and Policies	9.29	Environment Agency (Lizzie Griffiths) [1021]	We are pleased that Table 7 includes the recommendation that layout should be designed so that the most vulnerable uses are restricted to higher ground at lower risk of flooding, with more flood-compatible development (parking, open space etc.) in the highest risk areas.	This support is welcomed.
5199	Proposed Submission Core Strategy and Policies	DM32 - Protection and Provision of Community Facilities	The Theatres Trust (Planning Adviser) [278]	The Policy is unsound as it does not contain any policies that protect and enhance cultural facilities as guided in item 70 in the National Planning Policy Framework which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.	Cultural facilities are identified as main town centre uses in the NPPF and within CS14. CS14 refers to directing cultural uses to the town centre. SP14 in the Site Allocations Plan provides for the retention of cultural uses in the IP-One area.
5200	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	The Theatres Trust (Planning Adviser) [278]	The Trust is pleased Policy CS14 now reflects other uses (arts and culture), acknowledging that the success and vitality of a town centre is more than retail development. However, neither this or Policy DM32 include protection for existing cultural facilities such as theatres. Therefore the document does not reflect NPPF item 70 which states that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities. Also ensure that established facilities and services are retained and able to develop for the benefit of the community.	Cultural facilities are identified as main town centre uses in the NPPF and within CS14. CS14 refers to directing cultural uses to the town centre. SP14 in the Site Allocations Plan provides for the retention of cultural uses in the IP-One area.
5201	Proposed Submission Core Strategy and Policies	DM32 - Protection and Provision of Community Facilities	The Theatres Trust (Planning Adviser) [278]	Regarding Paragraph 2 of the Policy, we suggest that the change of use of one community facility (eg a post office) to another community facility (eg a place of worship) would still have a significant impact on the community.	The Council proposed a Pre-Submission Main Modification to policy DM32 to address this point.
5202	Proposed Submission Core Strategy and Policies	6.7 The Vision	Historic England (Mr Tom Gilbert-Woodridge) [243]	As stated in our response to the 2013 consultation, the vision makes little reference to the historic environment. Given that the NPPF requires local plans to set out a positive strategy for the conservation and enhancement of the historic environment (paragraph 126), the vision should contain explicit reference to how the Local Plan will address Ipswich's historic environment and heritage assets. Without such reference, we consider the Core Strategy is unsound as it is not consistent with national policy.	The vision's opening statements include reference to conserving and enhancing the town's historic character, therefore this aspect is already addressed.
5203	Proposed Submission Core Strategy and Policies	6.8 The Objectives	Historic England (Mr Tom Gilbert-Woodridge) [243]	We welcome the amendments to the objectives following our response to the 2013 consultation, and the more holistic reference to the historic environment in Objective 8.	This support is welcomed.
5204	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Historic England (Mr Tom Gilbert-Woodridge) [243]	We generally support the principle of concentrating development in the town centre and adjoining areas, but only where it does not compromise heritage assets and the distinctive character of Ipswich. We still have some concerns regarding the use of high densities within the town centre, Ipswich Village and Waterfront, but welcome the additional wording regarding heritage assets and the historic character of Ipswich at the end of the policy. The supporting text offers some helpful recognition of the design and conservation issues relating to the location of development.	The Council considers that the plan policies, together with the heritage information provided through the site sheets for each allocation, will protect heritage assets and the town's character. The latter is also supported through Conservation Area Character Appraisals and the Urban Character Supplementary Planning Document.
5205	Proposed Submission Core Strategy and Policies	CS3: IP-One Area Action Plan	Historic England (Mr Tom Gilbert-Woodridge) [243]	The IP-One Area contains the greatest concentration of heritage assets within the town (both designated and non-designated) and is a location that requires both conservation and change. We welcome the amendments to part (e) of Policy CS3 that requires the AAP to have policies that identify heritage assets which development proposals will need to have regard to. We note part (c) which provides a strong policy link to the Opportunity Areas contained within the AAP. It will be important that these opportunity areas contain adequate development principles relating to the historic environment (see separate representations).	This support is welcomed.
5207	Proposed Submission Core Strategy and Policies	CS4: Protecting our Assets	Historic England (Mr Tom Gilbert-Woodridge) [243]	Policy CS4 does not meet the NPPF requirement for a positive strategy to the historic environment or constitute a strategic policy approach. There is a need for a more explicit strategic policy approach. The supporting paragraphs also need amendments.	Amendments to CS4 were proposed through the Council's Pre-Submission Main Modifications. A Statement of Common Ground is being produced with Historic England and Suffolk County Council in respect of heritage assets.
5208	Proposed Submission Core Strategy and Policies	CS11: Gypsy and Traveller Accommodation	Historic England (Mr Tom Gilbert-Woodridge) [243]	Support but require changes. We welcome improved reference to the historic environment in Part C of the policy, although to ensure accuracy with the NPPF, "historic assets" should be amended to "heritage assets" as a nationally defined policy term.	IBC would support the amendment to 'heritage assets' and is proposing this through its amendments to CS11 submitted as part of the Examination.
5209	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Historic England (Mr Tom Gilbert-Woodridge) [243]	We welcome the reference to heritage and archaeology as part of cultural and community facilities as a broad category of infrastructure to be secured or financed from new development.	This support is welcomed.
5210	Proposed Submission Core Strategy and Policies	DM5 - Design and Character	Historic England (Mr Tom Gilbert-Woodridge) [243]	We welcome Part (e) of the policy relating to the special character and distinctiveness of Ipswich. The completion of the Urban Characterisation Study SPD would help to support this policy.	This support is welcomed.
5212	Proposed Submission Core Strategy and Policies	DM6 - Tall Buildings	Historic England (Mr Tom Gilbert-Woodridge) [243]	While we generally welcome the criteria within this policy regarding tall building proposals, it is not clear whether this policy has been reviewed since the adoption of the original Core Strategy to see whether it remains justified and effective. We maintain that a comprehensive and thoroughly modelled policy is required, as well as a general policy approach on the identification of strategic views. Part (i) of the policy helpfully refers to conservation areas, but should be strengthened by reference to listed buildings and other heritage assets.	Through the Pre-Submission Main Modifications the Council proposed amendments to include reference to listed buildings and other heritage assets. The Council is producing a Statement of Common Ground with Historic England and Suffolk County Council.
5213	Proposed Submission Core Strategy and Policies	DM8 - Heritage Assets and Conservation	Historic England (Mr Tom Gilbert-Woodridge) [243]	While we welcome amendments and additions to Policy DM8 following the previous consultation, the policy needs further amendments and additions in order to make it sound.	Through the Pre-Submission Main Modifications the Council proposed amendments to policy DM8. The Council is producing a Statement of Common Ground with Historic England and Suffolk County Council.
5214	Proposed Submission Core Strategy and Policies	DM9 - Buildings of Townscape Interest	Historic England (Mr Tom Gilbert-Woodridge) [243]	We broadly welcome this policy and the recognition given to buildings of townscape interest as part of a local list approach.	This support is welcomed.
5215	Proposed Submission Core Strategy and Policies	DM30 - The Density of Residential Development	Historic England (Mr Tom Gilbert-Woodridge) [243]	It is not clear whether the density targets set out in this policy have been reviewed since the adoption of the Core Strategy to establish whether they remain appropriate. High densities may be acceptable in some locations, including in the town centre, but care needs to be taken to avoid harm to heritage assets through overly dense development. The SA notes uncertainties with regards to the impact of this policy on objective ET9. The policy helpfully sets out exceptions to the general approach, and specific site allocations should provide clarity with regards to detailed design issues.	The policy includes exceptions to the density requirements where the site location, characteristics, constraints or sustainable design justify a different approach.
5216	Proposed Submission Core Strategy and Policies	Objective 8	Historic England (Mr Tom Gilbert-Woodridge) [243]	The indicators and targets for Objective 8 should be improved with regards to the historic environment. Reference to buildings at risk is welcomed, but the national register now covers all designated heritage assets on a Heritage at Risk (HAR) Register. There should be a related target to this indicator stating that the number of assets on the HAR Register should be reduced. Other indicators/targets could include the number of up-to-date conservation area appraisals and management plans, and/or the number of planning decisions made in accordance with officer / English Heritage advice.	Through the Pre-submission Main Modifications the Council has added reference to the Historic England Heritage Assets at Risk register and reference to reducing the number on the list.
5221	Proposed Submission Core Strategy and Policies	CS3: IP-One Area Action Plan	Associated British Ports [209]	ABP requests that recognition is made in Policy CS3 and its accompanying text to the Port of Ipswich and to other important existing employment and other activities within and adjoining the IP-One area which the Council wishes to safeguard and support. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.	This issue is addressed through policy DM26 Protection of Amenity. The importance of the Port is recognised elsewhere e.g. through CS13/8/141.
5223	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Associated British Ports [209]	ABP welcomes and supports the definition of its land at the Port of Ipswich (at the West Bank and Cliff Quay) as existing employment areas defined on the policies map and the protection of this land for employment uses. This is consistent with the Port's recognition in the NALEP Strategic Economic Plan as part of the port and logistics 'underpinning sector' for the regional economy and the recognition given in the DPD Review of the strategic role and importance of the Port of Ipswich (at paragraphs 5.6, 6.19 and 9.153 - 9.154).  ABP supports Policy CS13(b).	This support is welcomed.
5226	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Associated British Ports [209]	ABP supports Policy CS20.	This support is welcomed.

5227	Proposed Submission Core Strategy and Policies	8.108 (CS10)	Mr Martin Hore [1420]	With regard to road infrastructure this is totally unsound. Only additional traffic in the immediate vicinity of the Garden Suburb has been considered.  Strong representations in the earlier consultation re the effect on traffic congestion in other parts of Ipswich have been ignored.  Specifically access from the Garden Suburb to the A14/A12 and the town's main employment and out-of-town shopping areas will require traffic to transit the Norwich Road, Valley Road, Chevalier Street, and Yarmouth Road junctions which are already over-congested and a designated AQMA.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5230	Proposed Submission Core Strategy and Policies	DM25 - Protection of Employment Land	Associated British Ports [209]	Support Policy DM25.  Whilst Policy DM25 will serve to safeguard existing employment areas, care should be exercised when development proposals are brought forward in the vicinity of these areas (consistent, perhaps, with other policies of the DPD) to ensure that this new development does not prejudice existing employment uses and business operations which are "appropriately located" (consistent with the key strategic challenges for Ipswich identified at paragraph 5.25). ABP requests, therefore, that the local planning authority does not apply the policies of the Core Strategy and Policies DPD Review uncritically and in isolation in exercising its development control functions.	Policy DM26 requires amenity to be considered in the context of both proposed and existing development.
5232	Proposed Submission Core Strategy and Policies	8.213	Mr Martin Hore [1420]	Recognition of the need for a bypass to address traffic demands of housing growth in North Ipswich is welcome. However, there is nothing to indicate that consent to developments in the Garden Suburb will be conditional on road improvements of this nature.  Strong representations in the earlier consultation re the effect on traffic congestion in other parts of Ipswich have been ignored. Specifically the effect on the Norwich Road, Valley Road, Chevalier Street, and Yarmouth Road junctions which are already over-congested and a designated AQMA	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5264	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Jonathan Yelland [1433]	I object to the Northern Fringe development on the following grounds:- -The impact of significant amounts of additional traffic in this part of Ipswich has not been adequately scoped and there are not sufficient measures to deal with this traffic growth. -The impact of such a large development on this part of Ipswich has not been correctly planned for in terms of impact on services / utilities and local amenities	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5265	Proposed Submission Core Strategy and Policies	4.4	Suffolk County Council (Mr Robert Feakes) [356]	The County Council is committed to supporting the sustainable development of Ipswich. Through participation in the Ipswich Policy Area Board and on-going work to shape and implement the Local Plan, the County Council believes that, with the Borough Council, the requirements of the Duty to Cooperate have been met in respect of County Council functions.	This support is welcomed.
5266	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Suffolk County Council (Mr Robert Feakes) [356]	Currently the Highway Authority does not have sufficient evidence to judge whether or not the residual cumulative impacts of the development proposed will be severe. This needs to be provided by IBC. The County Council will continue to advise IBC on commissioning further evidence to consider this matter. Modelling undertaken for the adopted Core Strategy suggested that the overall effects of development could be mitigated if sufficient sustainable transport measures were delivered. This model is being updated. It is likely that the planned growth will have significant localised impacts on the highway network, necessitating sustainable transport measures and highway mitigation.	See Suffolk County Council letter dated May 24th 2016 in response to the Traffic Assessment (CDL reference PSCD18a)
5267	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Suffolk County Council (Mr Robert Feakes) [356]	Notwithstanding the current gaps in the transport evidence base, the Core Strategy and Policies Document's approach to transport policy appears to be largely sound. Policy CS5 supports a strategic approach to delivering sustainable transport and is welcomed.	This support is welcomed.
5268	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Suffolk County Council (Mr Robert Feakes) [356]	Paragraphs 8.207 - 8.215 set out a series of strategic highway capacity measures which the Borough Council intends to support. The County Council agrees that the delivery of a Wet Dock Crossing has merit and the project is included within the Local Transport Plan strategy for Ipswich. The County Council is already seeking funding from the New Anglia Local Enterprise Partnership toward progressing the project. Furthermore, the County Council will also lead efforts to investigate proposals for additional highway capacity to the north of Ipswich. This will be carried out with partners, including IBC, through the Ipswich Policy Area Board.	This support is welcomed.
5269	Proposed Submission Core Strategy and Policies	9.101	Suffolk County Council (Mr Robert Feakes) [356]	National Guidance refers to the need for Transport Assessments to be proportionate to the scale and nature of development. Whilst the commitment to sustainable transport solutions is welcomed, IBC's proposed threshold of ten dwellings for a full Transport Assessment is tougher than the approach previously applied by national government and does not consider the role of Transport Statements. The County Council wishes to apply a more robust approach than that in the 2007 Guidance, but believes that indicative thresholds would be more appropriate. Depending on other feedback, ten dwellings would be a useful indicative threshold for requiring a Transport Statement.	The Council would support reference to Transport Statements being appropriate for some developments should the Inspector consider this appropriate.
5270	Proposed Submission Core Strategy and Policies	Appendix 5 - Activities or services relevant to each Planning Standard Charge Heading	Suffolk County Council (Mr Robert Feakes) [356]	Appendix 5 refers to a list of infrastructure to be 'included in the standard charge'. It is assumed that this list is not intended as a precursor to a Community Infrastructure Levy Regulation 123 List; this should be made clear through an amendment to the supporting text. Whilst the County Council agrees that development should be expected to fund each of these types of infrastructure (where consistent with relevant tests), the County Council would not support each of these types of infrastructure being funded under the Community Infrastructure Levy (rather than through the Section 106 regime).	Paragraph 8.180 makes no suggestion that this list relates to CIL. However, a statement has been added to Appendix 5 through the Pre-Submission Additional Modifications stating that it is not a regulation 123 list.
5271	Proposed Submission Core Strategy and Policies	CS15: Education Provision	Suffolk County Council (Mr Robert Feakes) [356]	CS15 recognises the NPPF requirement for a proactive, positive and collaborative approach to ensuring sufficient school places. Planned housing growth is expected to generate additional pupils: Early Years 68; Primary 169; Secondary 122; Sixth Form 27. Schools and early years settings are operating at/close to capacity. Growth in pupil numbers from housing growth and population growth justifies CS15's positive approach and the need for a new primary school in the Town Centre. Windfall development (1800 dwellings) will also generate pupils: Early Years 180; Primary 450; Secondary 324; Sixth Form 72. This overall scale can be managed through expanding existing schools.	Noted. The County Council's Education and Learning Infrastructure Plan has been published as part of the Core Document Library (CDL reference PSCD24).
5274	Proposed Submission Core Strategy and Policies	DM21 - District and Local Centres	Suffolk County Council (Mr Robert Feakes) [356]	CS15 encourages early education facilities to be located within/adjacent to district/local centres or co-located with schools, which is supported. However, Policy DM21 protects district and local centres for retail uses. Community facilities have significant value on high streets. They include early education (Appendix 4), but the criteria in DM21 set the bar too high. 'Prominent positions' (part (i)) is difficult to define and therefore ineffective. The required marketing strategy (Part (ii)) will restrict the County Council's ability to provide new early years facilities. Paragraph f. regarding accessibility is difficult to achieve when facilities are aimed at specific age groups.	The policy would allow for a community facility within a frontage, provided A2-A5 uses would not exceed 40%. However, the clause about prominent positions is difficult to define and the Council has therefore proposed to delete it through its Pre-Submission Main Modifications. Also the marketing requirement is restrictive and the Council therefore proposed amendments to confirm this would only apply to vacant units.
5275	Proposed Submission Core Strategy and Policies	CS6: The Ipswich Policy Area	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Duty to co-operate is not met as the Plan fails to properly set out a long term strategy to meet future development needs, the Council has not adequately engaged in co-operation with neighbouring authorities in advance of the preparation of the Plan.  There is a recognition that the Council has not met the requirement under the NPPF to identify sufficient sites, and that the Council and its neighbouring authorities need to work together to achieve a robust strategy and there is an admission that the work that is needed hasn't been done yet.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect.
5276	Proposed Submission Core Strategy and Policies	1.8	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Paragraph 1.8 of the Plan states that the purpose is to set out the strategy for the future development of Ipswich to 2031. The principal concern is that the Plan fails to do this. The Plan only shows locations for 44.7% of the 10,585 additional homes over and above existing commitments needed between now and 2031.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect.
5277	Proposed Submission Core Strategy and Policies	Chapter 8: Development of the Strategy	Suffolk County Council (Mr Robert Feakes) [356]	Suffolk Health and Wellbeing Strategy includes four strategic objectives: Every child has the best start in life; Residents have access to a healthy environment; Older people have a good quality of life; People have the opportunity to improve their mental health. CS15 considers the educational needs of children. Other policies promote safe and sustainable travel and protect public open space and play facilities. Ipswich's population is ageing, though less quickly than the rest of Suffolk. Higher housing accessibility requirements are not needed currently, but may be considered through any further Local Plan review. Mental health is supported through policy DM5d.	Noted. Through the Pre-Submission Main Modifications to policy DM5 the Council proposed a requirement for accessible and adaptable dwellings based upon the Government's introduction of the 'optional' standards in Building Regulations.

5278	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Suffolk County Council (Mr Robert Feakes) [356]	The County Council has no comment regarding the soundness of this policy, which appears to deliver the vision set out in the adopted masterplan. As set out elsewhere in the [County Council's] response, the County Council sees proper infrastructure mitigation as being the key issue for delivery of the Northern Fringe/Garden Suburb. CS10 requires that the Garden Suburb establishes a new library service on site. This is in line with the County Council's strategy for library provision.	Noted.
5279	Proposed Submission Core Strategy and Policies	10: Table 8B	Suffolk County Council (Mr Robert Feakes) [356]	Table 8B refers to three 420-place primary schools. The County Council requires three 315-place primary schools as the minimum necessary resulting from the development. Experience of other large greenfield developments suggests that they generate greater demand for education places than existing housing. It is intended that land is provided such that the schools can be constructed with a larger (420-place) capacity, if monitoring of the number of children emanating from the development necessitates it. In the initial phases, the primary schools will not be constructed for more than 315 pupils each; this enables flexibility whilst meeting statutory requirements for proportionality.	Noted.
5280	Proposed Submission Core Strategy and Policies	CS16: Green Infrastructure, Sport and Recreation	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	The green rim designation has no clear purpose or evidence base to support it - it appear in part to be justified in relation to connecting ecological/ natural and semi-natural green space (although without any clear explanation as to why this is necessary). In a context where the plan is failing to both meet objectively assessed housing need and failing to make use of appropriate development opportunities within the Borough boundary the designation of a green rim is premature and prejudicial to the proper long-term planning of the area.	The green rim designation is evidenced by the Haven Gateway Green Infrastructure Strategy. It is not an impediment to appropriate housing allocations on the periphery of the Borough, as the Ipswich Garden Suburb allocation at CS10 illustrates. As a link for wildlife and people, it can be incorporated within development sites where necessary.
5281	Proposed Submission Core Strategy and Policies	4.4	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Paragraph 4.4 refers to the Duty to co-operate, it is evident from the failure of this plan to properly set out a long-term strategy to meet future development needs that the Council has not adequately engaged in co-operation with neighbouring authorities in advance of the preparation of this Plan.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect.
5282	Proposed Submission Core Strategy and Policies	DM8 - Heritage Assets and Conservation	Suffolk County Council (Mr Robert Feakes) [356]	The County Council understands the role of the Area of Archaeological Importance (AAI) to be descriptive; i.e. alerting developers to areas where the high potential for significant archaeological assets may necessitate detailed archaeological investigation as part of the development process. At present, DM8 applies differing investigation procedures for inside and outside the AAI. Whilst the County Council supports a more stringent pre-determination investigation requirement within the AAI, the reference to applying archaeological monitoring conditions as standard is not appropriate given the significance of the Historic Environment Record in this part of Ipswich.	The archaeology part of policy DM8 has been substantially re-worded and a Statement of Common Ground is being produced between the Council, Suffolk County Council and Historic England.
5283	Proposed Submission Core Strategy and Policies	8.42 (CS4)	Suffolk County Council (Mr Robert Feakes) [356]	Paragraph 8.42 [CS4] could better describe the significance of the AAI. 'An Area of Archaeological Importance for remains of all periods in the historic core, particularly Anglo Saxon deposits.'	The proposed amendment has been proposed by the Council through its Pre-Submission Additional Modifications.
5284	Proposed Submission Core Strategy and Policies	DM33 - Green Corridors	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	The designation of the green rim has no clear purpose or evidence base to support it. In the context where the plan is failing to both meet objectively assessed housing need and failing to make use of appropriate development opportunities within the Borough boundary the designation of a green rim is premature and prejudicial to the proper long term planning of the area.	The green rim designation is evidenced by the Haven Gateway Green Infrastructure Strategy. It is not an impediment to appropriate housing allocations on the periphery of the Borough, as the Ipswich Garden Suburb allocation at CS10 illustrates. As a link for wildlife and people, it can be incorporated within development sites where necessary.
5285	Proposed Submission Core Strategy and Policies	DM34 - Countryside	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	The designation of the green rim has no clear purpose or evidence base to support it, in the context of the plan failing to meet objectively assessed housing need and failing to make use of the appropriate development opportunities within the Borough boundary, the designation of a green rim is premature, and prejudicial to the proper long-term planning of the area.	The green rim designation is evidenced by the Haven Gateway Green Infrastructure Strategy. It is not an impediment to appropriate housing allocations on the periphery of the Borough, as the Ipswich Garden Suburb allocation at CS10 illustrates. As a link for wildlife and people, it can be incorporated within development sites where necessary.
5286	Proposed Submission Core Strategy and Policies	9.73	Suffolk County Council (Mr Robert Feakes) [356]	The following words should be inserted in the supporting text for DM8 to help define the reasoning behind the AAI:  'The settlement of Ipswich has developed through Saxon, Medieval and later periods, leaving a legacy of history below ground which tells the complex story of the town's evolution. To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damaged, the planning process must ensure that development proposals respect archaeologically important sites.'  The Borough Council should also consider amending the Core Strategy to reflect the emerging proposal for an Archaeological Supplementary Planning Document.	The archaeology part of policy DM8 has been substantially re-worded and a Statement of Common Ground is being produced between the Council, Suffolk County Council and Historic England.
5287	Proposed Submission Core Strategy and Policies	DM25 - Protection of Employment Land	Suffolk County Council (Mr Robert Feakes) [356]	The County Council as Minerals and Waste Planning Authority considers the Ipswich Local Plan to be generally consistent with the Suffolk Minerals and Waste Plans. In order to support the provision of sustainable waste management facilities, e.g. Household Waste and Recycling Centres, amend DM25 to make it clear that, where compatible with adjacent uses, waste facilities can come forward on land allocated for employment. This amendment would better enable the delivery of employment-generating civic amenity sites, whilst still protecting other employment uses. Other policies, such as DM26, would ensure that sufficient weight is given to the protection of amenity	Although the Council would prefer to see less extensive uses of employment land than waste related uses, it is agreed that employment areas would be the appropriate location for such activities where they are necessary. Through the Pre-Submission Additional Modifications clarification has been added to the explanatory text as some waste uses are B class uses but some are sui generis.
5288	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Objective 3 states that at least 13,550 new homes are to be provided within the Ipswich Housing Market Area, but the plan do not achieve that Objective.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This issue was addressed through the Stage 1 hearings held in March 2016.
5289	Proposed Submission Core Strategy and Policies	CS16: Green Infrastructure, Sport and Recreation	Suffolk County Council (Mr Robert Feakes) [356]	In order to meet the requirements of the Habitats Regulations, the Borough Council should liaise with Natural England to ensure that any recommended measures to avoid likely significant effects on the features of designated sites should be put in place. A further amendment is suggested to ensure Objective 6 is realised in relation to Rights of Way. Wording is suggested to add to the supporting text to CS16, to emphasise the role of the Public Rights of Way network as a major recreational resource, economic asset and means of promoting mental and physical health.	The Council is liaising with Natural England on the production of a Recreational Avoidance and Mitigation Strategy which will identify specific mitigation measures and mechanisms for their delivery. The roles of the Rights of Way network are captured in paragraph 8.169.
5290	Proposed Submission Core Strategy and Policies	DM10 - Protection of Trees and Hedgerows	Suffolk County Council (Mr Robert Feakes) [356]	The Borough Council may consider a minor amendment to the supporting text of Policy DM10 to make reference to the Hedgerow Regulations.	The Hedgerow Regulations are already referenced in paragraph 9.83.
5291	Proposed Submission Core Strategy and Policies	DM31 - The Natural Environment	Suffolk County Council (Mr Robert Feakes) [356]	Policy DM31 appears to be a useful tool for applying the Framework's requirement to protect and enhance the natural environment. However, in order to be sound, the policy needs to refer to protected species in addition to Priority species, and 'priority species' rather than 'biodiversity action plan species' because there is no longer a national list of BAP species. An amendment is proposed to ensure that the plan is compliant with the legal duty set out by the Natural Environment and Rural Communities Act 2006. Reference should also be added to 'Biodiversity: Code of Practice for Planning and Development' (BS42020).	A number of amendments were proposed through the Pre-Submission Additional Modifications to address this comment.
5292	Proposed Submission Core Strategy and Policies	DM28 - Protection of Open Spaces, Sport and Recreation Facilities	Suffolk County Council (Mr Robert Feakes) [356]	Policies CS5, CS16, CS20, DM5, DM17 and DM34 promote the development of the Rights of Way Network. Useful supporting text exists at paragraphs 8.63 and 9.99. However an amendment is required to protect the Public Rights of Way Network. Suggest amending DM28 by adding 'Rights of Way' to the title and add text at the end: 'Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made.'	Rights of way are already protected through policy DM17 clause a. However the Council would support reference to Rights of Way in policy DM28 if considered necessary.
5293	Proposed Submission Core Strategy and Policies	DM34 - Countryside	Suffolk County Council (Mr Robert Feakes) [356]	Policy DM34 refers to the Area of Outstanding Natural Beauty, in line with the requirements in the Framework. However, the policy does not explicitly deal with the impacts of development outside the AONB on the character and qualities of the AONB. Other locally protected landscapes, which exist outside the Borough boundaries but potentially within sight of new development are not referred to, which is not consistent with paragraph 109 of the Framework.	It is unlikely that development outside the AONB but within Ipswich Borough would harm the AONB, as the two are largely separated by the A1214. However, through the Pre-Submission Main Modifications the Council proposed adding the following wording: 'The landscape and scenic beauty of the AONB should be conserved.'
5310	Proposed Submission Core Strategy and Policies	1.2	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Paragraph 1.2 of the plan states that the purpose is to set out a strategy for the future development of Ipswich to 2031, the Plan only manages to show locations for 44.7% of the 10,585 additional homes over and above existing commitments needed between now and 2031.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect.
5311	Proposed Submission Core Strategy and Policies	6.14	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Paragraph 6.14 seeks to justify why new housing development is necessary in Flood zone 3, and does this on the basis that there is insufficient suitable land elsewhere for meeting housing need, as presently drafted, the Core Strategy is not maximising the use of suitable housing land within the Borough outside Flood zone 3, paragraph 6.14 requires amendment to cross refer to the fact the such additional opportunities have been maximised in advance of additional housing within flood zone 3.	The Site Allocations plan allocates land that is suitable, achievable and available in accordance with the published Strategic Housing Land Availability Assessment. This helps to achieve the strategy of continued urban regeneration plus a greenfield urban extension.
5313	Proposed Submission Core Strategy and Policies	8.79 (CS7)	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	There is a recognition that the Council has not met the requirement under the NPPF to identify sufficient specific sites for the 1-10 years or broad locations for 11-15 years therefore does not meet the objectively assessed needs for housing. There is also a recognition that the Council and neighbouring authorities need to work together and there is an admission that the work that is needed hasn't been done yet.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This was addressed through the Stage 1 hearings held in March 2016.

5314	Proposed Submission Core Strategy and Policies	8.31 (CS2)	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Paragraph 8.31 notes that beyond 2024, opportunities for development in the Borough boundary become more limited, and there will be a need to consider ways of meeting housing need outside the Borough boundary, it is incumbent on the Council to make best use of land within its own boundary before it relies this has not been done.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This was addressed through the Stage 1 hearings held in March 2016.
5315	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Suffolk County Council (Mr Robert Feakes) [356]	Whereas Central Government funding can be accessed to provide additional school places for natural population change, the Government intends that development should fund additional need arising from housing growth. Therefore, Policy CS17 is essential for the delivery of Policy CS15 and for ensuring that overall strategy represents sustainable development. Without Policy CS17, the County Council would not consider this document sound. Contributions will also be used to expand and improve existing libraries to meet the demands of growth. Therefore the plan is sound regarding library provision in accordance with NPPF Chapter 8.	This support is welcomed.
5316	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Policy CS2 sets out the principal locations for growth, the plan is failing to deliver enough land for housing and needs to achieve the maximum delivery possible from existing suitable sites within the Borough boundary. Part B of the policy refers vaguely to the potential for additional growth locations later in the Plan period, this approach is unsound.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This was addressed through the Stage 1 hearings held in March 2016.
5317	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Valerie Bryne [1361]	The development will have an adverse impact on roads, health services and loss of countryside and habitat needed for health and wellbeing. Traffic impacts have not been considered. Air quality will be affected by traffic and vegetation loss. Access to schools, hospitals and GPs needs to be addressed. Drainage and flooding problems should be addressed. What is the evidence on the need for new homes? The Country Park should be available as soon as vegetation is removed. Residents are not being listened to.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5318	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	The Plan is failing to deliver enough land for housing, and needs to achieve the maximum delivery possible from existing suitable sites within the Borough boundary.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect.
5319	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mrs Valerie Bryne [1361]	What evidence is there that 12,500 jobs can be created, all the major employers have left Ipswich. There has been no major jobs growth since 2001. Where will the jobs come from?	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5320	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Crest Strategic Projects (Josephine Ritter) [1456]	We consider the overall Local Plan housing target contained within the Proposed Submission Core Strategy to be justified and positively prepared, and accordingly consistent with National Policy. IBC concludes that it has only 3.9 years' worth of supply (4,253 dwellings) based upon its adopted Core Strategy housing requirement (AMR December 2014). However, the PPG advises that the shortfall should be rectified within the first five years, which results in 3.26 years' of supply. This therefore places increased emphasis on the deliverability of the identified locations for growth, including the Garden Suburb.	Noted. The housing delivery strategy is one of continued urban regeneration and a greenfield urban extension alongside that.
5322	Proposed Submission Core Strategy and Policies	4.4	Crest Strategic Projects (Josephine Ritter) [1456]	IBC has an agreement with neighbouring councils to undertake further policy work which addresses growth needs of the IPA, including potential unmet housing need from IBC. CSP therefore consider that IBC has demonstrated that it has engaged with neighbouring authorities and has a strategy in place to address its housing land supply. However, IBC is seeking to "... rely on windfall sites and will work with neighbouring local authorities to address housing need later in the plan period (CS7)." IBC should ensure that it continues proactively to explore options of accommodating housing overspill through the whole plan period.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This was addressed through the Stage 1 hearings held in March 2016.
5324	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Crest Strategic Projects (Josephine Ritter) [1456]	We fully support the continued allocation of the IGS (CS10). However, there is no evidence available to demonstrate how the triggers included within supporting Table 8B have been arrived at, and whether they represent an 'appropriate stage' for delivery. CS10 and Table 8B do not have due regard to the need for a "comprehensive approach" to the development of IGS as a whole. There are currently no effective mechanisms in place to ensure the delivery of infrastructure or to ensure a collaborative approach to development, which will compromise the deliverability of IGS as a whole.	The Council is currently working with the developers to produce an Infrastructure Delivery Plan which will identify mechanisms for infrastructure delivery.
5325	Proposed Submission Core Strategy and Policies	4.4	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Until recently (2012/13) little effort has been made to constructively engage with neighbouring authorities. There is no recent evidence of effective and deliverable policies on strategic cross-boundary matters. The Core Strategy should not be examined until such work is released. The effectiveness of the Core Strategy would be greatly improved through cross-boundary joint initiatives and the public should have the opportunity to comment on these. Any intentions for development of the former sugar beet site (in Babergh District and recently purchased by Ipswich Borough Council) should be examined as part of the Core Strategy Review.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5326	Proposed Submission Core Strategy and Policies	4.2	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Until recently there has been little public evidence of around engaging and reaching agreement with neighbouring authorities on housing, economy and infrastructure despite the IPA Board. Ipswich was not involved in the commissioning of the 2012 Strategic Housing Market Assessment. Welcome the more recent increased frequency of meetings and transparency of the Board. There is no evidence of strategic policy outcomes from the IPA. There are no published joint topic papers. Individual jobs targets for Ipswich and neighbouring authorities are unrealistic when compared with the January 2015 East of England Forecasting Model forecasts.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5327	Proposed Submission Core Strategy and Policies	10: Table 8B	Crest Strategic Projects (Josephine Ritter) [1456]	CS10 is supported by Table 8B, which sets out the detailed infrastructure requirements and trigger points for their delivery. There is no evidence available to demonstrate how the triggers have been arrived [at], and whether they represent an "appropriate stage" for delivery. The policy and Table 8B do not currently have due regard to the need for a "comprehensive approach" to the development of IGS as a whole. There are no effective mechanisms in place to ensure the delivery of infrastructure, which will compromise the deliverability of IGS as a whole. See Appendix 1 of full submission for detailed comments.	The Council is currently working with the developers to produce an Infrastructure Delivery Plan which will identify mechanisms for infrastructure delivery.
5328	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	Crest Strategic Projects (Josephine Ritter) [1456]	Policy CS12 states that new developments at IGS will be required to provide for at least 35% on-site affordable housing. We understand that a viability appraisal has been undertaken to inform the delivery of the IGS, but question whether the Council seeking 35% affordable housing is robust and justified, especially when the affordable housing requirement is significantly lower at 15% elsewhere in the Borough. We seek further information on IBC viability assessment and reserve the right to comment further once this has been made available. As currently drafted, CS12 is not considered to be 'justified'.	The justification for 35% affordable housing is explained in the Ipswich Whole Plan Viability Study commentary (LPCD27) and the Ipswich Garden Suburb Viability Testing Final Report (PSCD23).
5329	Proposed Submission Core Strategy and Policies	DM1 - Sustainable and Construction	Crest Strategic Projects (Josephine Ritter) [1456]	Emerging Policy DM1 part a, seeks that all new build residential developments achieve a minimum of Level 4 for the Code for Sustainable Homes standard or equivalent. Whilst we in part support the principle of this emerging policy and welcome the removal of the onerous requirement to achieve Code Level 5 and 6 [in adopted policy DM1], we query whether seeking Code Level 4 on all development sites, we query the need for the Council to include such a policy given the Code requirements are dictated by Building Regulations.	The requirements relating to the Code for Sustainable Homes have been deleted following the Government's withdrawal of the Code.
5330	Proposed Submission Core Strategy and Policies	DM2 - Decentralised Renewable or Low Carbon Energy	Crest Strategic Projects (Josephine Ritter) [1456]	Emerging Policy DM2: Decentralised Renewable or Low Carbon Energy replicates adopted Policy DM2 by requiring all new development of 10 or more dwellings to provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources. We object to the principle of this policy as there is no robust evidence base to justify the requirement and there has been no regard to potential viability issues.	The viability of DM2 has been considered through the Viability Testing for the Ipswich Development Plan report (COL reference LPCD26). This recommends that a flexible approach is applied. The policy contains flexibility in relation to viability in this respect.
5331	Proposed Submission Core Strategy and Policies	DM5 - Design and Character	Crest Strategic Projects (Josephine Ritter) [1456]	DM5 part i, introduces the provision of public art where this would be required to enhance the public realm and/or reinforce a sense of place. This could include new installations where this would be commensurate to the scale and type of development. We do not object to IBC seeking public art but expect any requests to be proportionate in scale and to allow for flexibility, taking into account the other contributions sought, to ensure that new developments remain viable and deliverable. The definition of 'art' should be flexible and cover the delivery of a wide range of products/installations.	Public art provided as a consequence of the approval of major development schemes has social, environmental and cultural benefits. It also supports the regeneration of existing areas and reinforces the identity of new ones (such as at Ravenswood). Thus public art can make an important contribution to place making and the public realm. The policy allows the need for public art to be considered on a site by site basis. This allows a proportionate and flexible approach. The Council approved Public Art Policy Commissioning Guidelines on 13th July 2010.
5332	Proposed Submission Core Strategy and Policies	DM8 - Heritage Assets and Conservation	Crest Strategic Projects (Josephine Ritter) [1456]	Emerging Policy DM8: Heritage Assets and Conservation replicates adopted Policy DM8, but also combines the archaeology element of adopted Policy DM9: Buildings of Townscape Interest. Emerging Policy DM8 part c, Conservation Areas, states that the position, height, mass and materials of a proposed building shall pay regard to the character of adjoining buildings and the area as a whole. Whilst we do not object to this policy, the weight that should be attached to the character of buildings should be proportionate to their status and this should be reflected in the policy wording to ensure that it is 'justified'.	The policy applies within conservation areas and therefore the character of adjoining buildings and the whole area is important. The conservation area character appraisals provide a more detailed analysis of what is important in each area and would provide the information required.
5333	Proposed Submission Core Strategy and Policies	7.2 Key Diagram	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Our concerns in regard to the green rim are that the designation has no clear purpose or evidence base to support it, the plan is failing to meet objectively assessed housing need, and failing to make use of appropriate development opportunities within the Borough boundary, the designation of a green rim is premature, and prejudicial to the proper long-term planning of the area.	The green rim designation is evidenced by the Haven Gateway Green Infrastructure Strategy. It is not an impediment to appropriate housing allocations on the periphery of the Borough, as the Ipswich Garden Suburb allocation at CS10 illustrates. As a link for wildlife and people, it can be incorporated within development sites where necessary. Indeed, it is important to refer to the green rim to ensure that development allocations made through the plan, or applications made during the plan period, plan for it and incorporate it where appropriate.

5334	Proposed Submission Core Strategy and Policies	DM17 - Transport and Access in New Developments	Crest Strategic Projects (Josephine Ritter) [1456]	Emerging Policy DM17 part c. seeks to incorporate electric charging points and part f. seeks safe and convenient access to public transport within 400m. The provision of electric charging points within a development will not be necessary for development to come forward in a sustainable way. DM17i. is not necessary for all development sites, e.g. it does not take into account sites that are within reasonable walking distance of local services which would not necessarily need to be served by public transport. The policy should therefore be reworded to reflect individual site circumstances to ensure it is 'justified' and 'effective'.	The Suffolk Guidance for Parking 2014 expects new development to incorporate electric charging points. Policy DM17 already builds in flexibility by applying the requirement only where consistent with the scale and location of development. Ipswich, like many towns and cities, has Air Quality Management Areas and electric vehicles are one way of helping to tackle air quality issues. Therefore this is an important element of sustainability. Good access to public transport is also considered essential to encourage and enable sustainable travel choices. Close proximity to local services is important, but it is unlikely that residents would meet all their needs within a local centre. They may need to travel a longer distance to facilities such as sports facilities, hospital, secondary school or places of work and need to have the option to do this by non-car modes.
5335	Proposed Submission Core Strategy and Policies	DM18 - Car and Cycle Parking	Crest Strategic Projects (Josephine Ritter) [1456]	Emerging Policy DM18: Car and Cycle Parking - this policy proposes to move away from maximum parking standards and seeks to ensure developments comply with the minimum standards of car and cycle parking adopted by the County Council. We support this policy.	This support is welcomed.
5336	Proposed Submission Core Strategy and Policies	DM24 - Affordable Housing	Crest Strategic Projects (Josephine Ritter) [1456]	DM24 states that affordable housing provision will be required in accordance with Policy CS12 and replicates adopted Policy DM24. This emerging Policy is not 'justified' or 'effective'. As noted above, the appropriate Code Level is determined by Building Regulations and therefore should not be dictated by planning policy. We also consider part d. of the policy to be unreasonable. Evidence suggests that car ownership among affordable housing occupants is lower than market housing, and therefore the requirement to provide the same ratio of parking is considered unnecessary. We therefore seek the removal of part d.	Through the Pre-Submission Main Modifications the Council has proposed to delete reference to the Code for Sustainable Homes from this policy. The Suffolk Guidance for Parking Technical Guidance 2014 makes no distinction in relation to affordable housing therefore the policy is appropriate.
5337	Proposed Submission Core Strategy and Policies	8.76 (CS7)	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	The objection is that there is recognition that the Council has not met the requirement under the NPPF to identify specific sites in years 1-10 or broad locations for years 11-15. There is recognition from the Council that the Plan does not meet the objectively assessed housing need. There is recognition the Council and neighbouring authorities need to work together to achieve a robust strategy, there is recognition that this work has not been done yet.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect.
5338	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Whilst CS20 supports feasibility studies into a wet dock crossing and a northern bypass or a link road to the north of the town' at this stage such proposals can only be viewed as aspirational. In our opinion without the latter the development of the Ipswich Garden Suburb is unsustainable and should not be supported due to traffic congestion and the potential damaging impact on air quality. Without the northern bypass or link road the CS is unsound and should be rejected.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5340	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	The DTZ report provides insufficient evidence to justify the reduction in new retail floorspace. The 2010 retail capacity study should be updated now to inform policy. Policy is not positively prepared and could sterilise Ipswich town centre for medium to large scale retail development for 11 years, having serious implications on the vitality and viability of the centre. Additional specific issues: other prospective development sites (e.g. Jewsons) were not considered by the DTZ report; the reduction of retail floorspace is arbitrary; CS14 restricts large scale retail development to one site.	The reduction in floorspace to 15,000sqm is based upon the conclusions of the 2013 DTZ Report, as outlined in the Retail Topic Paper. Other sites have been allocated for a mix of uses including smaller scale retail, in addition to commercial and residential uses.
5341	Proposed Submission Core Strategy and Policies	Diagram 3 - The Ipswich Key Diagram	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	The Plan is failing to deliver enough land for housing, and in that context, needs to achieve the maximum delivery possible from existing suitable sites within the borough boundary. The Key Diagram should identify additional suitable sites (including my client's land at north-east Ipswich). In addition, it is inappropriate for the Key Diagram to show a green rim around the edge of Ipswich, in advance of the formulation of long-term strategy for accommodating the number of new homes needed in the Plan period.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. The green rim designation is evidenced by the Haven Gateway Green Infrastructure Strategy. It is not an impediment to appropriate housing allocations on the periphery of the Borough, as the Ipswich Garden Suburb allocation at CS10 illustrates. As a link for wildlife and people, it can be incorporated within development sites where necessary. Indeed, it is important to refer to the green rim to ensure that development allocations made through the plan, or applications made during the plan period, plan for it and incorporate it where appropriate.
5343	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 4:	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Objective 4 sets out the principal locations for growth. Whilst we do not object to the proposed locations, the Plan is failing to deliver enough land for housing, and in that context, needs to achieve the maximum delivery possible from existing suitable sites within the borough boundary. Objective 4 should therefore recognise the potential for additional growth locations.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This was addressed through the Stage 1 hearings held in March 2016.
5345	Proposed Submission Core Strategy and Policies	5.25	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Paragraph 5.25 refers to the key challenges for Ipswich over the Plan period, but absent from the list of points raised is recognition of the fact the Plan is failing to deliver enough housing, because of constrained boundaries, and in this context needs to achieve the maximum delivery possible from existing suitable sites, before relying on assistance from neighbouring authorities.	The Council's response to Matter 4b explains how the Council has considered other potential opportunities to provide land for housing in the Borough.
5346	Proposed Submission Core Strategy and Policies	Table 3 - Estimated Housing Delivery for 2014/2031 Excluding Current Permissions as at 1st April 2014	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Based upon the sources of supply set out in Table 3, policy CS7 states that 5,434 new homes will be allocated for development through the Site Allocations Plan, the Plan is failing to deliver enough land for housing, and needs to achieve the maximum delivery possible from the existing suitable sites within the Borough boundary.	The Council's response to Matter 4b explains how the Council has considered other potential opportunities to provide land for housing in the Borough.
5350	Proposed Submission Core Strategy and Policies	DM25 - Protection of Employment Land	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	The policy potentially risks prejudicing the delivery of new retail and town centre floorspace in suitable locations. The Employment Areas defined on the policies maps and referenced in DM25 appear to be based on an out of date evidence base (Suffolk Haven Gateway Employment Land Review, October 2009). The Council must consider its stance in relation to the protection of employment sites in relation to the need for other uses. Retail and leisure capacity evidence demonstrates more sites are required. The Jewson site will be available for redevelopment in the plan period and should therefore be allocated to meet need.	The employment areas are needed to accommodate B class uses. A retail allocation is made at IP040 and leisure at IP260 (see Site Allocations Plan policies CSP7 and SP10) therefore further sites are not needed.
5351	Proposed Submission Core Strategy and Policies	9.156 (DM25)	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	DM25 [and supporting text] potentially risks prejudicing the delivery of new retail and town centre floorspace in suitable locations. The Employment Areas defined on the policies maps/through DM25 appear to be based on an out of date evidence base (Suffolk Haven Gateway Employment Land Review, October 2009). The Council must consider its stance in relation to the protection of employment sites in relation to the need for other uses. Retail and leisure capacity evidence demonstrates more sites are required. The Jewson site will be available for redevelopment in the plan period and should therefore be allocated to meet need.	The employment areas are needed to accommodate B class uses. A retail allocation is made at IP040 and leisure at IP260 (see Site Allocations Plan policies CSP7 and SP10) therefore further sites are not needed.
5355	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Gladman Developments (Mr Russell Spencer) [1437]	Pursuing sustainable development requires careful attention to be paid to viability and costs in plan-making, and should assess the likely cumulative impacts (my emphasis) on development of such policies and standards so that the viability of the plan itself is not compromised through making the proposed scale of development unviable. The Inspector needs to be satisfied that this is indeed the case.	The Viability Testing for the Local Plan report (CDL reference LP0CD26) considered the policy requirements related to sustainable development, and the conclusions were addressed through modifications to policy DM1 (which has now been further modified following the withdrawal of the Code for Sustainable Homes).
5356	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Gladman Developments (Mr Russell Spencer) [1437]	Deferring decisions around addressing housing need within the wider Ipswich housing market area to a later date is clearly not in line with the requirements of the Framework or PPG.	There is a lack of land in the Borough to meet the housing need in full. The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect.
5357	Proposed Submission Core Strategy and Policies	CS8: Housing Type and Tenure	Gladman Developments (Mr Russell Spencer) [1437]	New 2012-based Sub-National Household Projections have been published, and it is these that should form the starting point for any comprehensive assessment of objectively assessed housing need, as per PPG2.	The Council's response to Matter 2.3 explains how the housing need has been assessed and this was considered in stage 1 of the Local Plan Examination in March 2016. The housing need will be reviewed through working with neighbouring authorities.
5361	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mersea Homes Limited (Mr Stuart Cock) [346]	The obligations to secure 15% energy provisions from decentralised sources or to achieve 'significant' reductions in carbon emissions are not justified nor is it consistent with national policy. The obligations should be deleted.	The requirements are consistent with Sections 1(a) and 1(b) of the Planning and Energy Act which allow a planning authority to set requirements for a proportion of energy used in a development to be sourced from renewable or low carbon sources in the locality.
5362	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Mersea Homes Limited (Mr Stuart Cock) [346]	The Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Table 3 (CS7) further reinforces the degree to which the Council depends on adjoining authorities. The Council have not yet secured agreement to meet its housing need in adjoining authorities. It must therefore focus on demonstrating and justifying as part of this plan, what need it can meet, and identifying the infrastructure necessary to support that amount of development. CS2 should provide the overall narrative of this approach. [Logged also to para4.4]	The Council is allocating 4,734 dwellings (including 2,700 at the Ipswich Garden Suburb before 2031 with the remaining 800 to be delivered after this date). Sites for these dwellings have been identified through the strategic housing land availability assessment and subsequent updates, which has informed the site allocation process. The identification of sites for housing in neighbouring local authority areas is outside the remit of this plan but has been identified in policy CS7 with the statement that the Council will work with neighbouring local authorities to address housing need. This will be planned via joint / aligned plans commencing in 2016 with the neighbouring local authorities.
5363	Proposed Submission Core Strategy and Policies	4.4	Mersea Homes Limited (Mr Stuart Cock) [346]	The Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Table 3 (CS7) further reinforces the degree to which the Council depends on adjoining authorities. The Council have not yet secured agreement to meet its housing need in adjoining authorities. It must therefore focus on demonstrating and justifying as part of this plan, what need it can meet, and identifying the infrastructure necessary to support that amount of development. CS2 should provide the overall narrative of this approach. [Also logged as CS2 objection]	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This issue was addressed through the Stage 1 hearings held in March 2016.
5364	Proposed Submission Core Strategy and Policies	CS6: The Ipswich Policy Area	Mersea Homes Limited (Mr Stuart Cock) [346]	We do not consider that the Borough has adequately demonstrated that it has met the Duty to Cooperate. The requirements of the Duty, as explained by the NPPF and Planning Practice Guidance, are for key issues to be considered and addressed during plan-making, and for clear outcomes to be reflected in policy. The Council must focus on identifying its full objectively assessed need, and justifying the extent to which it can meet a proportion of that need. Policy CS6 should provide the basis for it to secure agreement with adjoining authorities in the longer term.	The Council is committed to working with neighbouring authorities to address housing need and has produced a Memorandum of Understanding to this effect. This issue was addressed through the Stage 1 hearings held in March 2016.

5365	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Mersea Homes Limited (Mr Stuart Cock) [346]	Policy CS7 relies upon evidence which is not up to date. In order to be certain that the full objectively assessed housing need has been identified, further updates to evidence are required. Notwithstanding the issue of evidence, Policy CS7 does not provide an adequate or sound basis for meeting housing need, since it is reliant on unidentified sources of housing land, including those outside the Ipswich Borough administrative area, to meet that need. The Council should focus on identifying the proportion of its full objectively assessed need that it can meet, and plan effectively to deliver that.	The Council's response to Matter 2.3 explains how the housing need has been assessed and this was considered in stage 1 of the Local Plan Examination. The housing need will be reviewed through working with neighbouring authorities.
5366	Proposed Submission Core Strategy and Policies	DM2 - Decentralised Renewable or Low Carbon Energy	Gladman Developments (Mr Russell Spencer) [1437]	Gladman reiterates the point made above when discussing policy CS1 that in seeking to use that all new build development of 10 or more dwellings shall provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources, this policy should comply with the requirements set out in paragraphs 173 and 174 of the Framework.	The viability of DM2 has been considered through the Viability Testing for the Ipswich Development Plan report (CDL reference LPCD28). This recommends that a flexible approach is applied. The policy contains flexibility in relation to viability in this respect.
5367	Proposed Submission Core Strategy and Policies	DM17 - Transport and Access in New Developments	Gladman Developments (Mr Russell Spencer) [1437]	Gladman has concerns that the current wording of this requirement takes too narrow an approach to sustainability, one based on simple distances to services, in this case public transport. Gladman believe that this is an outdated approach to understanding sustainability and does not take into account changes in people's lifestyles, the increase in levels of homeworking and the availability of an increasing range of services online and via home delivery, which are all serving to change people's travel patterns.	Good access to public transport is considered essential to encourage and enable sustainable travel choices. It is unlikely that residents would meet all their needs at home or online. They may need to travel a longer distance to facilities such as sports facilities, hospital, secondary school or places of work and need to have the option to do this by non-car modes.
5368	Proposed Submission Core Strategy and Policies	DM34 - Countryside	Gladman Developments (Mr Russell Spencer) [1437]	Concern is raised here that "development which would be relatively isolated in terms of access to public transport and community facilities should be avoided" but this is too restrictive and ignores the possibility of sites in these locations contributing to improving public transport connectivity and providing additional community facilities. The sustainability of such sites should be judged on a case-by-case basis through the planning balance exercise.	The countryside around Ipswich consists of a narrow strip of the urban fringe. It does not contain any settlements. Therefore the main concern of the policy relates to rural businesses and to isolated dwellings. The policy complies with NPPF paragraph 28 on the rural economy. In paragraph 55, the NPPF calls for isolated dwellings to be tightly controlled, however it does explain circumstances in which they may be acceptable. The policy could be interpreted as too restrictive in relation to this and therefore a modification is proposed. In relation to larger developments at the edge of settlements, as the Borough contains no rural settlements this is not considered appropriate. However a sentence will be added to address potential applications at the periphery of Ipswich's built up area.
5369	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mersea Homes Limited (Mr Stuart Cock) [346]	Support the allocation of the Ipswich Garden Suburb as a key element of the spatial strategy. However CS10 is not effective since it establishes inflexible and overly detailed policy requirements. The land use budget, land use annotations set out on the Proposals Map, and the details set out in Table 9B should be deleted. The IGS is supported by a draft SPD which provides a more flexible means of co-ordinating long term development. However, we have concerns that viability has not been fully reflected in the guidance. Including SPD detail in policy reduces flexibility to deal with changing circumstances.	The Council is currently working with the developers to produce an Infrastructure Delivery Plan which will identify mechanisms for infrastructure delivery.
5370	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	Mersea Homes Limited (Mr Stuart Cock) [346]	The requirement for 'at least' 35% affordable housing provision in the IGS is not justified by the evidence, nor does it contribute to an effective policy. CS12 has reduced the affordable housing target on sites other than IGS. We don't believe there is evidence to support this policy position; rather evidence indicates that the target for the IGS should also be reduced. The NPPF makes it clear (paragraphs 173-177) that local plan policy should not place an undue burden on development. Maintaining a 35% affordable housing target for the IGS will render it unviable, and will stall its delivery.	The justification for 35% affordable housing is explained in the Ipswich Whole Plan Viability Study commentary (LPCD27) and the Ipswich Garden Suburb Viability Testing Final Report (PSCD23).
5371	Proposed Submission Core Strategy and Policies	DM1 - Sustainable and Construction	Mersea Homes Limited (Mr Stuart Cock) [346]	The provisions of DM1 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF. The Code for Sustainable Homes is not mandatory, and is to be replaced by provisions under the Building Regulations. These critical national policy imperatives must be reflected in DM1 if it is to be a sound policy. The Council's whole-plan viability evidence (which we consider optimistic) demonstrates that the obligations set by DM1 have a detrimental effect on viability to the effect that it could determine whether sites would be deliverable.	Following the withdrawal of the Code for Sustainable Homes the Council has amended policy DM1 to reflect the provisions of Section 1(c) of the Planning and Energy Act which allows planning authorities to set energy efficiency standards which exceed the energy requirements of the Building Regulations. The Council's commentary on the Viability Testing for the Ipswich Development Plan report (LPCD27) explains how DM1 was amended to reflect its findings.
5373	Proposed Submission Core Strategy and Policies	DM2 - Decentralised Renewable or Low Carbon Energy	Mersea Homes Limited (Mr Stuart Cock) [346]	The provisions of Policy DM2 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF. The evidence base which purports to assess the viability implications of the policy demonstrates that this policy has a significant impact on the viability of sites, and will therefore affect deliverability. The Borough's own evidence also failed to assess the implications of the Policy on the IGS. The policy cannot therefore be considered the most appropriate strategy.	The requirements are consistent with Sections 1(a) and 1(b) of the Planning and Energy Act which allow a planning authority to set requirements for a proportion of energy used in a development to be sourced from renewable or low carbon sources in the locality. The Viability Testing of the Ipswich Development Plan report concluded that flexibility should be applied to the requirement. Policy DM2 contains flexibility where the requirement would affect viability.
5376	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Northern Fringe Protection Group (Mr Brian Samuel) [976]	There is no evidence of objectively assessed needs for freshwater and foul water infrastructure in the Borough or IPA, no reference to strategic solutions and no listing in infrastructure tables. The catch-all term 'utilities' should not be used as the Core Strategy will fail without strategic wastewater infrastructure including upgrading the sewage treatment works at Cliff Quay, Anglian Water Ipswich Water Reuse project and a solution for Ipswich Garden Suburb which may require a pipeline to Cliff Quay. Concerned the development will severely impact traffic congestion and air quality. A relief road or bypass to north Ipswich is required.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5377	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Applekirk Properties Ltd (Teresa Cook) [1452]	Applekirk Properties Ltd objects to policy CS2 as it cannot be considered to have been positively prepared and it is not justified as the strategy will not provide the future capacity for comparison and convenience retail floorspace identified in the evidence base. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed. We consider that policy CS2 fails to do this. Sites are available in the Waterfront/Merchants Quarter which would accommodate an element of the retail capacity identified for Ipswich and support its regeneration.	The amount and location of retail floorspace proposed for allocation is based upon the conclusions of the 2013 DTZ Report, as outlined in the Retail Topic Paper. Other sites have been allocated for a mix of uses including smaller scale retail, in addition to commercial and residential uses.
5378	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Applekirk Properties Ltd (Teresa Cook) [1452]	CS14 is not positively prepared or justified as the allocations included do not seek to meet the requirement for comparison retail identified in the evidence base. Insufficient sites are identified to meet the requirements for retail floorspace over the plan period, particularly for comparison goods. The evidence base identifies a requirement for additional retail floorspace. A single site is proposed for new retail development in the town centre (Westgate), which is carried forward as an existing commitment. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed.	The amount and location of retail floorspace proposed for allocation is based upon the conclusions of the 2013 DTZ Report, as outlined in the Retail Topic Paper. Other sites have been allocated for a mix of uses including smaller scale retail, in addition to commercial and residential uses.
5379	Proposed Submission Core Strategy and Policies	DM20 - The Central Shopping Area	Applekirk Properties Ltd (Teresa Cook) [1452]	Object to Policy DM20 as it cannot be considered to have been positively prepared and is not justified as the strategy will not provide the future capacity for comparison and convenience retail floorspace identified in the evidence base. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed. We consider that Policy CS20 fails to do this. The focus on the Central Shopping Area alone for major new retail development (here defined as over 200sqm) will not meet the requirements for retail floorspace over the plan period.	The amount and location of retail floorspace proposed for allocation is based upon the conclusions of the 2013 DTZ Report, as outlined in the Retail Topic Paper. Other sites have been allocated for a mix of uses including smaller scale retail, in addition to commercial and residential uses.
5380	Proposed Submission Core Strategy and Policies	DM23 - Retail Proposals Outside Defined Centres	Applekirk Properties Ltd (Teresa Cook) [1452]	Object to Policy CS23 as it cannot be considered to have been positively prepared and is not justified as the strategy will not provide the future capacity for comparison and convenience retail floorspace identified in the evidence base. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed. We consider that Policy CS23 fails to do this. The focus on the Central Shopping Area alone for major new retail development (here defined as over 200sqm) will not meet the requirements for retail floorspace over the plan period.	The amount and location of retail floorspace proposed for allocation is based upon the conclusions of the 2013 DTZ Report, as outlined in the Retail Topic Paper. Other sites have been allocated for a mix of uses including smaller scale retail, in addition to commercial and residential uses.
5388	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Northern Fringe Protection Group (Mr Brian Samuel) [976]	An alternative of co-operating more closely with other authorities to find a more sustainable location than the Northern Fringe, which is remote from new employment sites and not connected by sustainable transport, could have been identified. These are reasons why housing needs are unable to be met in the Borough, under the terms of the National Planning Policy Framework. Support the strategy of urban renaissance in central Ipswich but concerned that multi-site development of the Garden Suburb will have a detrimental impact on this. The removal of the 60% target for development on brownfield land is a negative step.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5389	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The proposed removal of the 60% target for development on brownfield land is a negative step.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5390	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Traffic from the Garden Suburb will have a severe adverse impact across the whole of north Ipswich and the town centre. Assumptions that use will be made of public transport, cycling and walking are not realistic due to the location of employment sites. Welcome the recent work commissioned by Suffolk County Council around solutions for the road network around North Ipswich. There has been no traffic assessment of the effects of multiple starts. The foul water pipeline from north Ipswich to the treatment works is at capacity. There is no mechanism to ensure timely delivery of the Country Park.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5391	Proposed Submission Core Strategy and Policies	10: Table 8A	Northern Fringe Protection Group (Mr Brian Samuel) [976]	There is no evidence of objectively assessed needs for freshwater and foul water infrastructure or to strategic solutions, and no listing in the infrastructure tables.	See Appendix 1 to this table - 'Ipswich Garden Suburb'

5393	Proposed Submission Core Strategy and Policies	8.205 (CS20)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Air quality issues, which are likely to be made worse by increasing traffic congestion, may also impact on the effectiveness of the Core Strategy. The 2014 Air Quality Annual Report (July 2014) shows exceedances of nitrogen dioxide at locations within and outside of the Air Quality Management Areas. The Council needs to provide evidence that air pollution will not breach legal limits.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5396	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3.	Northern Fringe Protection Group (Mr Brian Samuel) [976]	ONS migration data used by the Council only extends to 2010/11, the latest ONS forecast shows no net migration from 2012-2031 for Ipswich. DCLG's February 2015 household projections suggest a need for 10,434 new homes. The baseline household figure used is too high. The Viability Report indicates 28% affordable housing for the Garden Suburb, the affordable housing target should not compromise delivery of other infrastructure. It is not clear whether the jobs target relates to Ipswich or the Ipswich Policy Area. How will jobs growth be measured? A higher population has been used to estimate jobs growth than population growth.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5399	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Support the efforts of the Council in using existing models and forecasts. However, the data is not up to date. ONS migration data used only goes up to 2010/11 whereas latest forecasts show no migration to Ipswich from 2012-2031. Immigration will take place in places with better jobs and wages. DCLG's household projections show a need for 10,434 homes. The baseline household figure used is too high.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5400	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The Ipswich Viability Report showed that the indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure. It is therefore unsound to set a target of 35%. Since the Garden suburb infrastructure costs were developed other costs have arisen due to wastewater infrastructure.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5401	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Based on past trends, jobs are unlikely to grow by 625pa to 2031. EEFM forecasts are based on higher population projections than ONS projections and the sectors forecast to grow don't align with the Strategic Economic Plan. There is over-reliance on retail jobs. The target may not be achievable without government funding and improved transport infrastructure. Job forecasts in the Core Strategies of Ipswich and neighbouring authorities are 26% higher than EEFM and are unrealistic. Unclear whether the target relates to Ipswich or the Ipswich Policy Area. If the latter a separate jobs target must be established. Indicators are needed.	See Appendix 1 to this table - 'Ipswich Garden Suburb'. Through the Pre-Submission Main Modifications the Council has clarified that the jobs forecast relates to the Borough.
5402	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The Viability Study challenges the deliverability of the Westgate site by stating that small comparison and convenience retail is marginally viable but large format convenience is not viable. This raises uncertainty over deliverability of jobs in the town centre. The Core Strategy does not mention the acquisition of the Sugar Beet Factory site which could take jobs away from the Borough.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5403	Proposed Submission Core Strategy and Policies	6.7 The Vision	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Support the vision but consider the strategy will not deliver it. The development of the Garden Suburb will result in severe congestion in north Ipswich and the town centre. Proposals to increase opportunities for buses, walking and cycling to the town centre are flawed as evidence challenges the viability of job creation in the town centre. Homes growth without jobs and sustainable transport will result in more commuting. This will harm prospects for investment. Updated traffic modelling and air quality modelling must be undertaken.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5404	Proposed Submission Core Strategy and Policies	8.21 (CS1)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The Core Strategy fails to take sufficient account of the waste water issues arising from proposed expansion of Ipswich. The Draft Strategic Economic Plan identified the scale and cost of new connections as inhibiting development of some strategic sites. The Water Cycle Study shows that significant upgrading is required to wastewater treatment capacity. The pipeline from north Ipswich to Cliff Quay is at capacity and no viable solutions for the Garden Suburb have been proposed. This could seriously undermine the delivery of the Core Strategy.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5405	Proposed Submission Core Strategy and Policies	8.28 (CS2)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Support the strategy of urban renaissance in Ipswich and note the first bullet point 'it will maximise opportunities to re-use previously developed land within central Ipswich'. The proposed removal of the 60% target for development on brownfield land is a negative step. With the multi-site development of the Garden Suburb concerned that developers will focus on greenfield development. This will have a detrimental impact on the regeneration of brownfield sites particularly in the town centre and deprived areas.	See Appendix 1 to this table - 'Ipswich Garden Suburb'. The Council is allocating a mix of sites and the housing trajectory (see the Council's response to Matter 2.3) shows that it is anticipated that both greenfield and brownfield sites will be developed concurrently.
5406	Proposed Submission Core Strategy and Policies	8.52 (CS4)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5407	Proposed Submission Core Strategy and Policies	10: Table 8B	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site. The Core Strategy fails to identify and plan for key strategic wastewater infrastructure. There is the possibility that a major new pipeline will be needed from the Garden Suburb to Cliff Quay.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5408	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The model policy setting out the NPPF presumption in favour of development should not be conflated to the reminder of Policy CS1 and should instead be a separate policy. The obligation to secure 'significantly reduced carbon emissions' is not costed, is not justified nor is it consistent with national policy. The obligation should be deleted. The obligation to secure 15% energy provision from decentralised sources is not justified nor is it consistent with national policy. The obligation should be deleted.	In relation to carbon emissions, this is taken forward through policies DM1 and DM2. The requirements have been considered through the Viability Testing for the Ipswich Local Plan report (CDL reference LPCD26). Policy DM1 was modified accordingly, as explained in the Council's commentary to the Viability Report (LPCD27).
5409	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We consider that the Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Reference to Table 3 indicates that the 'residual need later in the plan' represents around 40% of the overall plan housing requirement. The 'duty to cooperate' topic paper published by the Council offers no substantive evidence that the Duty has been discharged. We are unconvinced that the Council can satisfactorily demonstrate that it has achieved the duty and for that reason we consider that the Plan is fatally flawed.	The Duty to Co-operate was considered through the stage 1 hearings held in March 2016. This issue was addressed during the stage 1 hearings in March 2016.
5410	Proposed Submission Core Strategy and Policies	4.4	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Duplicate of CS2 objection. We consider that the Council has failed to demonstrate how it has met the Duty to Cooperate. CS2(b) explains that housing need will be met in the wider Ipswich Policy Area. Reference to Table 3 indicates that the 'residual need later in the plan' represents around 40% of the overall plan housing requirement. The 'duty to cooperate' topic paper offers no substantive evidence that the Duty has been discharged. We are unconvinced that the Council can satisfactorily demonstrate that it has achieved the duty and for that reason we consider that the Plan is fatally flawed.	The Duty to Co-operate was considered through the stage 1 hearings held in March 2016. This issue was addressed during the stage 1 hearings in March 2016.
5411	Proposed Submission Core Strategy and Policies	CS4: Protecting our Assets	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Paragraph 113 of the NPPF requires (policy) to be criteria-led, but Policy CS4 is not. We also consider that the balancing measures set out in paragraph 118 of the NPPF should be reflected in the Policy. We consider that the last paragraph of the Policy should form part of Policy CS1.	CS4 does not only relate to biodiversity – it is a strategic policy dealing with all types of heritage. Development management policies in chapter 9 set out the detailed approach to applications. The last para could go in CS1 but more logically remains in CS4 as it relates to conserving resources.
5412	Proposed Submission Core Strategy and Policies	CS6: The Ipswich Policy Area	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We do not consider that the Borough has adequately demonstrated that it has met the Duty to Cooperate. The requirements of the Duty, as explained by the NPPF and Planning Practice Guidance, are for key issues to be considered and addressed during plan-making, and for clear outcomes to be reflected in policy. There is limited evidence to demonstrate that this has happened. There is, however, clear evidence to demonstrate that key issues have been deferred, and that Policies provide only an interim policy position pending further discussions. Neither situation demonstrates that the Duty to Cooperate has been met.	The Duty to Co-operate was considered through the stage 1 hearings held in March 2016. This issue was addressed during the stage 1 hearings in March 2016.
5413	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy CS7 relies upon evidence which is not up to date. In order to be certain that the full objectively assessed housing need has been identified, further updates to evidence are required. This includes 2011 Census data and DCLG 2012-based household projections as a starting point. Notwithstanding the issue of evidence, Policy CS7 does not provide an adequate or sound basis for meeting housing need, since it is reliant on unidentified sources of housing land, including those outside the Ipswich Borough administrative area, to meet that need. It is therefore contrary to NPPF paragraph 47.	The Council's response to Matter 2.3 explains how the housing need has been assessed and this was considered in stage 1 of the Local Plan Examination. The housing need will be reviewed through working with neighbouring authorities.
5414	Proposed Submission Core Strategy and Policies	CS8: Housing Type and Tenure	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy CS8 does not provide an effective basis for decision-making since the exceptions allowed undermine the control which is intended to be exercised under the Policy. It should be deleted. CS8 requires a mix of dwelling types to be delivered in accordance with the SHMA (itself now a dated document), then recognises that exceptions will be necessary to reflect the site's location and characteristics. A further exception criterion allows a scheme to better reflect local housing need (which should be identified through the SHMA). The final exception criterion provides more flexibility allowing an overall housing numbers situation to override considerations.	The policy establishes an important principle about mix, which supports the Government's requirement to create sustainable, inclusive and mixed communities (NPPF paragraph 50). The exceptions simply indicate that the Council will take a pragmatic approach in certain circumstances.



5415	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy CS9 does not provide an effective policy in the context of the Borough's constrained housing land supply and should be deleted. Table 3 demonstrates an overall deficiency of supply. Land within the town centre and Garden Suburb is proposed to be allocated for development. There is limited other land which could be allocated. The practical function of Policy CS9 and the degree to which it can be effective is therefore unclear. CS9 cannot have any material impact upon housing delivery, since the proportion of previously developed land which can be brought forward is a function of the supply available.	Whilst it is acknowledged that the land supply to a large degree determines the greenfield/brownfield mix, the Council considers that the policy establishes the important principle that it will focus development on previously developed land first, whilst recognising that greenfield development will also have an important role to play in meeting objectively assessed housing need.
5416	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We support the allocation of Ipswich Garden Suburb as a key element of the spatial strategy but are concerned that CS10 does not provide for effective policy, since it establishes inflexible and overly detailed policy requirements. The land use budget, land use annotations set out on the Proposals Map, and the details set out in Table 8B should be deleted. This level of detail is inappropriate in the context of a strategic allocation which is supported by an already drafted supplementary planning document. The SPD provides a more flexible means of co-ordinating long term development across the Garden Suburb.	The Council is currently working with the developers to produce an Infrastructure Delivery Plan which will identify mechanisms for infrastructure delivery.
5417	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The requirement for at least 35% affordable housing provision in the IGS is not justified by the evidence, nor does it contribute to an effective policy. This level of affordable housing provision is not viable in Ipswich. The NPPF makes it clear (paragraphs 173-177) that local plan policy should not place an undue burden on development and that the implications of policy should be tested during plan making. The PBA Viability Testing for the Ipswich Development Plan provides no scenario which models the IGS. On a practical level, a floorspace measure is incapable of being applied to outline planning applications.	The Viability Testing of the Ipswich Development Plan report (CDL referencer LPD26) concluded that 35% would be viable for the Ipswich Garden Suburb and the Ipswich Garden Suburb Viability Testing Final Report (PSCD23).
5418	Proposed Submission Core Strategy and Policies	CS15: Education Provision	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	CS15 refers to safeguarding land for educational uses within IGS through the Proposals Map. Our representations against Policy CS10 demonstrate why it is inappropriate for this level of detail to be shown on the policies map: it is not appropriate to establish detailed and inflexible land use parameters within strategic policies, particularly in the context of an SPD which the Council has already approved on an interim basis. The cross-reference to Policy CS10 can be retained, but it is inappropriate for a specific education site to be identified on the policies map. The wording of CS15 should be amended accordingly.	It is considered necessary and appropriate for the policy to specify the land uses which are expected to be delivered. The policy does include area/quantities of each item but is clearly stated as approximate. It is recognised that needs and market changes may alter over time hence the area is identified as approximate.  The triggers in table 8B are noted as indicative and a caveat is noted with the tables advising that they are as stated unless otherwise agreed with IBC through Infrastructure Delivery Plans. Triggers are considered appropriate to give a framework for ensuring necessary infrastructure to support the development is provided.
5419	Proposed Submission Core Strategy and Policies	CS16: Green Infrastructure, Sport and Recreation	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy CS16 should incorporate a strategic allocation to the Orwell Country Park, as provided under site allocations policy SP8, with clause (h) redrafted to provide flexibility in the way in which mitigation for impacts on European-designated conservation sites can be secured (and incorporating the provisions of clause (d)). The requirement for new development to contribute to the mitigation of existing deficiencies should be deleted. The function of both the proposed Ipswich Garden Suburb country park and the extension to the Orwell Country Park are the same.	The functions may be similar, i.e. managing visitors, but the point is that both are needed. Orwell Country Park (OCP) extension is about better managing visitors to that site to keep them away from the shore. The IGS country park is about attracting visitors right away from the Estuary. The OCP management plan is the strategic requirement – the Council is choosing to allocate the extension to the country park as a way to achieve it. The Council is also producing a mitigation strategy which will set out the range of measures required.
5420	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	CS17 is confused and contradictory. There is inconsistency and overlap in the presentation of requirements which might emerge through S106, and those that could be delivered by CIL. The Council should present a clear strategy for how it will coordinate infrastructure funding and which mechanisms are to be employed. Policy CS17 should be supported by an Infrastructure Delivery Plan which provides details of the infrastructure, cost and delivery mechanisms required to bring forward development, and should demonstrate that the Duty to Cooperate has been engaged, and that the provisions of paragraphs 162 and 173 of the NPPF have been met.	The Council is currently working with the developers to produce an Infrastructure Delivery Plan which will identify mechanisms for infrastructure delivery.
5421	Proposed Submission Core Strategy and Policies	Diagram 3 - The Ipswich Key Diagram	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Whilst we recognise that the green corridors shown in the Key Diagram are illustrative, the graphic style used to illustrate them provides a misleading indication of their width and positioning. A revised narrower graphic style should be used to illustrate the general alignment and geography of the corridors. CBRE SPUK II (No.45) Ltd control land west of Westerfield Road which is intercepted by the corridor which runs due north away from the town centre. The corridor illustratively occupies some one third of the site area. There is no clarity provided under Policy CS16 to define its character, dimensions or alignment.	The policy is clear that green corridors are not necessarily subject to blanket protection and policy CS10 together with the adopted interim SPD for Ipswich Garden Suburb are clear in setting out the green infrastructure for the area. (See also DM33)
5422	Proposed Submission Core Strategy and Policies	DM1 - Sustainable and Construction	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The provisions of Policy DM1 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF, which requires sustainability policies to be set in a way which is consistent with the Government's own approach. The Code for Sustainable Homes is not mandatory, and is to be replaced by provisions under the Building Regulations. The Council's whole-plan viability evidence demonstrates that the obligations set by Policy DM1 have a clearly detrimental effect on viability and could determine the deliverability of sites.	Following the withdrawal of the Code for Sustainable Homes the Council has amended policy DM1 to reflect the provisions of Section 1(c) of the Planning and Energy Act which allows planning authorities to set energy efficiency standards which exceed the energy requirements of the Building Regulations. The Council's commentary on the Viability Testing for the Ipswich Development Plan report (LPD27) explains how DM1 was amended to reflect its findings.
5423	Proposed Submission Core Strategy and Policies	DM2 - Decentralised Renewable or Low Carbon Energy	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The provisions of Policy DM2 are not consistent with national policy on sustainable design and construction and are contrary to the provisions of paragraphs 95 and 173 of the NPPF, which requires sustainability policies to be set in a way which is consistent with the Government's own approach. The evidence base which purports to assess the viability implications of the policy demonstrates that it has a significant impact on the viability of sites, and will therefore affect deliverability. NPPF paragraph 173 is clear that this adverse consequence should be avoided, its implications for the IGS have not been assessed.	The requirements are consistent with Sections 1(a) and 1(b) of the Planning and Energy Act which allow a planning authority to set requirements for a proportion of energy used in a development to be sourced from renewable or low carbon sources in the locality. The Viability Testing of the Ipswich Development Plan report concluded that flexibility should be applied to the requirement. Policy DM2 contains flexibility where the requirement would affect viability.
5424	Proposed Submission Core Strategy and Policies	DM5 - Design and Character	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The provisions of Policy DM5(i) are not consistent with national policy and are contrary to paragraph 173 of the NPPF. DM5(i) [and paragraph 9.51] implies an obligation for homes to be built to Lifetime Homes Standard, but doesn't make this clear. Thus policy DM5 is ambiguous and establishes obligations which are inconsistent with national planning policy, which recognises that the delivery costs of policies must be taken into account. Other obligations e.g. "very good architectural quality" and "highly sustainable" buildings are subjective and without justification. The public art policy has been deleted, and clause (i) should therefore be deleted.	Policy DM5 has been amended through the Pre-Submission Main Modifications to refer to the Government's 'optional' standards for accessible and adaptable dwellings. Clause i is required because the public art has been deleted.
5425	Proposed Submission Core Strategy and Policies	8.70 (CS6)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	There is no public evidence of any strategic policy outcomes from the IPA. There are no joint Topic Papers on housing growth, jobs growth and strategic infrastructure. Evidence base documents referred to in 8.70 have not been made available which is in breach of the Development Plan Document process. The Core Strategy should better ensure effective co-operation between Ipswich Borough Council and neighbouring authorities.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5426	Proposed Submission Core Strategy and Policies	8.99 (CS9)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The NPPF encourages the re-use of previously developed land. The proposed removal of the 60% target for brownfield land development is a negative step. With multi-site development at the Northern Fringe, concerned that developers will focus on greenfield rather than brownfield. This will have a detrimental impact on the regeneration of brownfield sites.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5427	Proposed Submission Core Strategy and Policies	8.102 (CS10)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Selectively referencing paragraph 47 of the NPPF gives the impression that the Council has no option but to comply. Paragraph 15 of the NPPF states 'as far as is consistent with the policies set out in the framework'. One such policy is 'sustainability'.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5429	Proposed Submission Core Strategy and Policies	8.124 (CS12)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	This paragraph risks concentrating affordable housing in certain phases rather than integrating affordable housing throughout the development. We are concerned about a concentration of council housing that will fail to create sustainable, inclusive and mixed communities in accordance with the NPPF. In this respect we note IBC's planning application for Ravenswood has been called in for inspection on this issue.	Through more detailed work on the IDP appropriate phasing for affordable housing will be factored in to ensure high concentrations of affordable housing are avoided and the communities being created are suitably mixed.
5430	Proposed Submission Core Strategy and Policies	CS16: Green Infrastructure, Sport and Recreation	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5431	Proposed Submission Core Strategy and Policies	8.177 (CS17)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Support the goal of ensuring Ipswich receives all the infrastructure it needs but are concerned that the proposed development of the Garden Suburb without adequate new road infrastructure will severely impact on traffic congestion and air quality and affect the quality of life of residents.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5432	Proposed Submission Core Strategy and Policies	8.213 (CS20)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Support the inclusion of paragraph 8.213 however disagrees that it is not practical to include such a route in the strategy. In our opinion without some form of northern bypass the development of the Ipswich Garden Suburb is unsustainable and should not be supported due to traffic congestion and the potential damaging impact on air quality. Without the northern bypass or link road the CS is unsound and should be rejected.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5434	Proposed Submission Core Strategy and Policies	DM3 - Provision of Private Outdoor Amenity	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Object to the change from 'rear garden area' to 'private garden area' as this will result in much smaller dwelling plots, some with no rear gardens at all and more cramming together of properties including infill. Welcome the stipulation in 9.21 that 'garden sizes need to be calculated independently of any parking space(s) to be provided.'	The amendment reflects the fact that some houses have private garden area to the side of the property (e.g. on corner plots), and it is not necessary for it to always be at the rear.

5439	Proposed Submission Core Strategy and Policies	9.21	Northern Fringe Protection Group (Mr Brian Samuel) [976]	We welcome the stipulation in Para 9.21 that 'Garden sizes need to be calculated independently of any parking space(s) to be provided.'	Noted.
5440	Proposed Submission Core Strategy and Policies	DM17 - Transport and Access in New Developments	Northern Fringe Protection Group (Mr Brian Samuel) [976]	It is unclear how 'significant adverse impacts' in bullet point (a) will be defined.	Suffolk County Council as Highway Authority would assess the impacts based on the Transport Assessment work to be submitted with planning applications and provide comments to IBC as Local Planning Authority. Ultimately the judgement of a proposals compliance with policy DM17 will rest with the LPA taking into account the comments from SCC and in the context of NPPF advice.
5441	Proposed Submission Core Strategy and Policies	CS6: The Ipswich Policy Area	Ipswich Central (Mr Paul Clement) [1423]	Ipswich Policy Area (P39) - we would be pleased to represent town centre businesses on the Ipswich Policy Board	At the moment the IPA Board is focusing on cross boundary strategic issues related to growth and therefore it would not be appropriate for the BID to be involved. However there may be scope for this in future if different issues are considered.
5442	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Ipswich Central (Mr Paul Clement) [1423]	Retail Development and Main Town Centre issues (P59) - we await details of how the Council proposes to "promote high quality investment and development". In our view, in the retail (including leisure) sector, the issue is not so much vacancy rates (which remain below national averages) but, rather, attracting missing retail names through proactive and entrepreneurial inward investment techniques. We would appreciate urgent discussions on how this should be delivered and whether the responsibility may sit best with ourselves, subject to suitable funding being identified.	Allocation of the Mint Quarter would be contrary to recommendations of the DTZ Report which concluded that Westgate would be commercially preferable, due to land assembly issues but also its distance from the main anchors and prime retail pitch. IPO40 provides the opportunity for big box retailing. The west side of the Mint Quarter also remains within the contracted Central Shopping Area boundary, identified as secondary shopping frontage, and therefore retail development could take place there. Whilst the benefits of a combined bus station are understood in terms of clarity for users, there is no evidence that a combined bus station would be deliverable.
5443	Proposed Submission Core Strategy and Policies	8.149 (CS14)	Ipswich Central (Mr Paul Clement) [1423]	Retail Development and Main Town Centre issues (P60) - the emphasis of 'retail' (not just shops, but banks, building societies and food & drink) development must be clustered around the Cornhill and Buttermarket areas and stretching towards the Waterfront. East-west expansion is not realistic.	See response to CS14 above.
5444	Proposed Submission Core Strategy and Policies	8.207 (CS20)	Ipswich Central (Mr Paul Clement) [1423]	Key Transport Proposals (P72) - we are concerned at proposals to restrict traffic in the gyratory system to one-lane without substantive alternative measures being put in place. In our view, pedestrian egresses across this area to and from the Waterfront are important but not dependent upon traffic removal.	A single lane gyratory has been suggested as part of the Wet Dock Crossing Outline Business Case and will be considered by Suffolk County Council in taking forward the proposals.
5445	Proposed Submission Core Strategy and Policies	DM18 - Car and Cycle Parking	Ipswich Central (Mr Paul Clement) [1423]	Car and Cycle Parking (P105) - there seems to be a lack of comprehension that the majority of shoppers and visitors to the town centre do, and will always, prefer to use their car. Retailers also prefer car-borne shoppers who are likely to buy more. It is imperative that Ipswich does everything that it can to attract back the car user, particularly after the Travel Ipswich project that has done much to damage reputations. Ipswich must not be perceived or, worse still become, anti-car.	The Council needs to balance drivers' wishes to park outside the store for nothing with the needs of residents who do not have access to a car (27.8% of households), the need to encourage healthy lifestyles, the need to limit congestion, the need to limit car emissions and its own need to raise revenue. The policy approach achieves this.
5446	Proposed Submission Core Strategy and Policies	DM20 - The Central Shopping Area	Ipswich Central (Mr Paul Clement) [1423]	Central Planning Area (P107) - the zoning policy for A1 to A5 is admirable but possibly unrealistic and unresponsive to changing town centres. Town centres need to change and alternative uses must not be deterred through unduly restrictive planning policy.	The percentage of frontage permitted as A2-A5 has been increased in response to the 2013 DTZ report which states that A3 and leisure uses are increasing in importance in town centres.
5447	Proposed Submission Core Strategy and Policies	DM20 - The Central Shopping Area	Ipswich Central (Mr Paul Clement) [1423]	Central Planning Area (P107) - the extension of the retail boundary to allow for retail development on the Westgate site is unacceptable for two reasons. Firstly, it is completely contrary to the Council Masterplan and BID Vision to concentrate development around a north-south axis. Secondly, Ipswich has been placed 'on hold' for much retail development and retailer acquisition through clinging for far too long to the uneconomic prospects for a retail-led development on the Cox Lane/Tacket Street site. Simply moving this to the other side of the town will achieve nothing more than creating more uncertainty.	See response to CS14 above.
5448	Proposed Submission Core Strategy and Policies	8.134 (CS13)	Ipswich Central (Mr Paul Clement) [1423]	Generally, we are disappointed that there is no mention of the Greater Ipswich Partnership, now extended to include Ipswich's outlying borough councils and more private sector representation.	Reference to the Greater Ipswich Partnership has been added to paragraph 7.3 of the Site Allocations plan through the Pre-Submission Additional Modifications.
5449	Proposed Submission Core Strategy and Policies	6.7 The Vision	Ipswich Central (Mr Paul Clement) [1423]	The Vision should take account of the Greater Ipswich Partnership Vision for change to the central area.	The Vision is consistent with wider visions for the town and through the Pre-submission Additional Modifications the Council proposed the addition of a new paragraph after 6.18 which explains how the Plan relates to the Ipswich Central Vision (The Vision for Ipswich: East Anglia's Waterfront Town).
5450	Proposed Submission Core Strategy and Policies	6.8 The Objectives	Ipswich Central (Mr Paul Clement) [1423]	The document talks of a strategy to 'enhance[the] town centre in terms of quantity and quality of the shops...' (P12), but it does not explain how and by when.	Policy CS14 allocates the site at Westgate for retail development.
5451	Proposed Submission Core Strategy and Policies	CS3: IP-One Area Action Plan	Ipswich Central (Mr Paul Clement) [1423]	We support the relocation of the two bus stations to a single site (most probably to the Cox Lane/Tacket Street area, in our view), thereby allowing for extension of the Tower Ramparts/Sailmakers centre.	Whilst the benefits of a combined bus station are understood in terms of clarity for users, there is no evidence that a combined bus station would be deliverable.
5462	Proposed Submission Core Strategy and Policies	Objective 10	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The target is very unambitious. Low income is a key factor in deprivation but is not included as an indicator. The Core Strategy needs to be more effective in tackling this issue.	The Local Plan can allocate land for development and support employment development but income levels are dependant on a range of other factors beyond the influence of the Local Plan.
5470	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	On Behalf of AquGen (Mr Mark Harris) [350]	We note that the Site continues to be allocated as a 'Strategic' Employment Site. This is on the basis that approximately 10ha of land is safeguarded for B Class employment use (see CS paragraph 8.139). AquGen objects to the Site's designation as 'Strategic' as this is not justified by the Evidence Base and is no longer required. Market conditions and signals provide evidence that the site does not serve a strategic function.	The Council has recently approved planning applications for car showrooms including servicing areas on part of the site which provide employment generating uses on the site.
5471	Proposed Submission Core Strategy and Policies	DM21 - District and Local Centres	On Behalf of AquGen (Mr Mark Harris) [350]	Re. the extension of the Nacton Road District Centre under Policy DM21: District and Local Centres and Proposals Map. There are no immediately available opportunities to the south and west of the Centre to support a viable extension. Instead, given the strong and positive linkage between the two locations, we recommend an expansion of the District Centre boundary to include the Site [Futura Park].	At approximately 10ha in size, Futura Park is the largest single employment site within the Borough. Therefore, it is of strategic importance in maintaining a range of sizes of site for B class employment uses available in the employment land supply. The Ravenswood District Centre is separated from Futura Park by Nacton Road and therefore the use of Futura Park for any future extension, if needed, is not considered suitable. Futura Park itself is not particularly central to any residential area.
5472	Proposed Submission Core Strategy and Policies	DM25 - Protection of Employment Land	On Behalf of AquGen (Mr Mark Harris) [350]	This Policy provides the basis for controlling the development of non B-class uses on Employment Sites. In addition to our comments above on the relationship of the employment definition with the NPPF, we consider the levels of control imposed in the policy to be far too strict and thus unsound.	The policy is intended to deal with B class uses which, often as relatively low value uses, need a specific protection policy.
5473	Proposed Submission Core Strategy and Policies	Objective 3	Northern Fringe Protection Group (Mr Brian Samuel) [976]	ONS migration data used by the Council only extends to 2010/11, the latest ONS forecast shows no net migration from 2012-2031 for Ipswich. DCLG's February 2015 household projections suggest a need for 10,434 new homes. The baseline household figure used is too high. The Viability Report indicates 28% affordable housing for the Garden Suburb, the affordable housing target should not compromise delivery of other infrastructure. It is not clear whether the jobs target relates to Ipswich or the Ipswich Policy Area. How will jobs growth be measured? A higher population has been used to estimate jobs growth than population growth.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5474	Proposed Submission Core Strategy and Policies	Objective 6	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The CS relies heavily on a transport modal shift from cars to more sustainable modes such as walking, cycling and public transport. This will be challenging and it is suggested that an additional indicator of the Census travel mode to work data be included to improve soundness.	Through the Pre-Submission Additional Modifications the Council has proposed a new indicator which is 'mode of travel to work (census)'.
5475	Proposed Submission Core Strategy and Policies	Objective 12	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The proposed indicator is vague and gives no measure of beneficial outcomes from working together on jobs growth, housing growth or strategic infrastructure.	The Council has, through its October 2015 Local Development Scheme, set a timetable for work on joint or aligned local plans. Progress on plans identified in the Local Development Scheme is reported on in the Annual Monitoring Report. Monitoring of the implementation of joint or aligned local plans will be for those plans to establish.
5476	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	Mrs Ann Jones [1416]	The core strategy seeks to address the need to accommodate 13,500 houses with the northern fringe development known as the 'Ipswich Garden Suburb' accounting for 3,500 houses. The principle of brown field first has now been dropped as I understand, this is rather short sighted. Brown field developments are normally more sustainable in all respects. It would appear that the desire on behalf of developers, to maximise profit is the key driver for the demise of brown field first.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5477	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Ann Jones [1416]	The Ipswich Garden suburb has already received a planning application from Mersea Homes/CBRE Global investors. The standard of architectural design wasn't inspiring. The road layout did not encourage any form of sustainable transport for instance, NO traffic free corridor to link with existing traffic free routes. The only commitment to sustainable transport was provision of an information pack containing local bus timing for would be residents.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5478	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	Mr James Jones [953]	The core strategy seeks to address the need to accommodate 13,500 houses with the northern fringe development known as the 'Ipswich Garden Suburb' accounting for 3,500 houses. The principle of brown field first has now been dropped as I understand, this is rather short sighted. Brown field developments are normally more sustainable in all respects. It would appear that the desire on behalf of developers, to maximise profit is the key driver for the demise of brown field first.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5479	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr James Jones [953]	The economic activity driving the demand for the Ipswich Garden suburb, is absent at the present time with absence of any statement of interest by organisations and businesses wishing to locate within sustainable commute distance. Who will buy the houses? It is likely that Ipswich Garden suburb will become a commuter enclave, contributing many additional vehicle movements.	See Appendix 1 to this table - 'Ipswich Garden Suburb'

5487	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Andrew Fisk [1402]	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development. There are some changes which will increase the area of road for traffic to queue on, but they do not fundamentally address the problem of traffic movement.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5488	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Mr Andrew Fisk [1402]	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5489	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr Andrew Fisk [1402]	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5490	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Mr Andrew Fisk [1402]	Transport policy, (CS5, CS17 and CS20) There doesn't seem to be any realistic attempt to deal with the additional traffic that will result from the Northern fringe development.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5491	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mr Andrew Fisk [1402]	Frankly I see little chance of more people cycling or walking without the creation of local jobs and I do not see where these will come from (CS13).	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5497	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Ipswich Liberal Democrats [1703]	Ipswich needs an up to date traffic assessment of the impact of this plan up until 2031. The proposed Northern Fringe Development will result in country lanes to the north of Ipswich outside the Borough Boundary being used as rat runs more than they are now with Valley Road at capacity. The Local Plan proposes a Sports Fields along Tuddenham Road to replace the Ipswich School Sports Fields behind Valley Road. This proposal should be part of the Traffic assessment for the Local Plan. Tuddenham Road has no pavements past the hump bridge.	The Council has now published the updated Transport Assessment (CDL reference PSCD18). See Appendix 1 to this table - 'Ipswich Garden Suburb'.
5510	Proposed Submission Core Strategy and Policies	DM10 - Protection of Trees and Hedgerows	Northern Fringe Protection Group (Mr Brian Samuel) [976]	In order to be sustainable Policy DM10 needs to reference the Hedgerow Regulations 1997 and the CS needs to state that "important hedgerows" will be protected from being removed (uprooted or destroyed).	The Hedgerow Regulations are already referenced in paragraph 9.83. The policy already refers to protecting hedgerows of amenity or biodiversity value, it is not clear what the term 'important' hedgerows would also include.
5511	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Ipswich Liberal Democrats [1703]	Policy CS20 (P. 69). The Council wants to take traffic out of the Waterfront Northern Key and reduce Star Lane traffic. Alternative is proposed a Wet Dock Crossing (P70) & 210. I agree that with 8.212. I do not agree that 8.213 should be regarded as an Alternative. Ipswich needs both. The Wet Dock Crossing will support the proposal for taking road capacity out of the Waterfront but without extra road capacity in the north of Ipswich the proposed large Northern Fringe Development should not be allowed to take place.	The Transport Assessment (CDL reference PSCD18) explains that the County Council is currently carrying out an assessment of northern Ipswich capacity enhancements.
5512	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Ipswich Liberal Democrats [1703]	Most of the allocated land and current jobs are on the south/east side of Ipswich or the Town Centre. Planning for a large mainly housing development on the Northern Fringe, essentially functioning as a dormitory for people employed elsewhere, will result in even more congestion.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5513	Proposed Submission Core Strategy and Policies	DM34 - Countryside	Ipswich Liberal Democrats [1703]	Policy DM 34 says, "Avoid the loss of best and most versatile agricultural land where possible." I find this whole paragraph strongly hypocritical since the land allocated for the Northern Fringe is precisely within that category of best and most versatile agricultural land. Mainly Grade 2a.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5526	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Dan Chapelle [1283]	Major concerns regarding development of the Garden Suburb. Increased traffic will make Westerfield Road more treacherous. Cannot see how Ipswich has the infrastructure to support such a huge housing development. Concerned that hospitals, GPs and schools are over-subscribed. Why aren't brownfield sites being developed? The Country Park should be delivered as a priority. The population figures are based on high and unfounded immigration figures.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5529	Proposed Submission Core Strategy and Policies	DM18 - Car and Cycle Parking	RCP Parking Ltd [1418]	We think that there is a need for the Council to develop a policy for long and short stay parking which reflects the real-time economy and is integral to parking strategy for the town (both long and short stay)	The Council's approach to parking reflects sustainable transport objectives and supports the town centre by providing for short stay shopper parking and limiting long stay commuter parking.
5530	Proposed Submission Core Strategy and Policies	DM10 - Protection of Trees and Hedgerows	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	DM10 clause (b) fails to anticipate that there may be other sound reasons for requiring works to a tree. The Policy should be reworded to reflect such cases. It restricts the criteria under which specific arboriculture activities will be permitted. However, landscape considerations (e.g. the creation of new green spaces) or transport considerations (e.g. the need to serve access to or within a development site) may offer sound justification for felling trees. In the context of a replacement policy being applied under DM10, these would be sound alternative reasons for undertaking works to a tree.	Through the Pre-Submission Main Modifications the Council proposed to amend clause (b) to state: "In relation to applications for works to trees, only granting..."
5531	Proposed Submission Core Strategy and Policies	DM17 - Transport and Access in New Developments	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy DM17 includes obligations which are not justified, nor have they been costed or assessed for their impact on viability. Clauses (c), (e) and (f) should be deleted. They are contrary to the requirement of paragraph 173. The obligations should be deleted unless and until evidence demonstrates that these measures are necessary, and that their costs do not adversely affect viability.	The Suffolk Guidance for Parking 2014 expects new development to incorporate electric charging points. Policy DM17 already builds in flexibility by applying the requirement only where consistent with the scale and location of development. Ipswich, like many towns and cities, has Air Quality Management Areas and electric vehicles are one way of helping to tackle air quality issues. Therefore this is an important element of sustainability. Good access to public transport is also considered essential to encourage and enable sustainable travel choices. Close proximity to local services is important, but it is unlikely that residents would meet all their needs within a local centre. They may need to travel a longer distance to facilities such as sports facilities, hospital, secondary school or places of work and need to have the option to do this by non-car modes.  Viability Testing of the Ipswich Development Plan report (LPCD26) did not identify a viability issue with this policy.
5532	Proposed Submission Core Strategy and Policies	DM24 - Affordable Housing	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Matters such as sustainable construction criteria and parking are managed by other plan policies which apply to all development in the Borough. There is no benefit to the inclusion of clauses (a) and (d) of Policy DM24, since other plan policies will already control those matters. They should be deleted.	Through the Pre-Submission Main Modifications the Council has proposed to delete reference to the Code for Sustainable Homes. The Suffolk Guidance for Parking Technical Guidance 2014 makes no distinction in relation to affordable housing therefore the policy is appropriate.
5534	Proposed Submission Core Strategy and Policies	DM29 - Provision of New Open Spaces, Sport and Recreation Facilities	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy DM29 appears to make provision for new development to meet existing open space deficiencies. This would be contrary to Regulation 122 of the CIL Regulations. Paragraph two implies that the extent of provision within an area will inform the contributions sought from new development. This could be used to justify additional provision to meet existing deficiencies in the area. This does not accord with the law on this matter. Evidence to support the provisions of Appendix 6 should be published. Without it, the degree to which the Policy is evidence based and the most appropriate alternative is questioned.	Substantial amendments to DM29 were proposed through the Pre-Submission Main Modifications, including clarification that developments are expected to mitigate their own impact.
5535	Proposed Submission Core Strategy and Policies	DM30 - The Density of Residential Development	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy DM30 is confused and contradictory in its requirements for density. Whilst clauses (a) to (c) seek to control densities, clauses (d) and (e) allow them to be overridden. Density should be informed by the principles set out in clause (d). Paragraphs 9.181 and 9.182 are aspirational and are in any case subject to the Housing Standards Review. Policy DM30 should be reviewed to ensure that it provides a reasonable basis for setting out the Council's expectations for the density of new development.	Paragraphs 9.181 and 9.182 have been revised through the Pre-Submission Main Modifications to relate to the Nationally Described Space Standards (CDL reference NCD50).
5536	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Home Builders Federation Ltd (Mr James Stevens) [283]	We consider that the Ipswich plan is unsound on three counts a) it has not been positively prepared - i.e. that the plan is based on a strategy which will meet the objectively assessed housing need including any unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; b) it is unjustified - it does not represent the most appropriate strategy when considered against the reasonable alternatives; and c) it is ineffective because it is not based on effective joint working on cross-boundary strategic priorities.	These points were discussed at the Stage 1 hearings in March 2016.
5537	Proposed Submission Core Strategy and Policies	4.4	Home Builders Federation Ltd (Mr James Stevens) [283]	Part B of the policy [CS2 - see separate representation] states that later in the plan period the Council will work with neighbouring authorities to address the housing need within the Ipswich housing market area (HMA). We consider that the plan is unsound because: a) it has not been positively prepared [to meet objectively assessed housing need]; b) it is unjustified - it does not represent the most appropriate strategy when considered against the reasonable alternatives; and c) it is ineffective because it is not based on effective joint working on cross-boundary strategic priorities.	These points were discussed at the Stage 1 hearings in March 2016.
5538	Proposed Submission Core Strategy and Policies	DM31 - The Natural Environment	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy DM31 should be a criteria led policy, consistent with the provisions of paragraph 113 of the NPPF. The NPPF requires policies which protect ecology and landscape designation to be criteria based. This ensures that proposals for development can be adequately, transparently and objectively assessed against policy. Policy DM31 offers no such opportunity. In order to be consistent with national policy, DM31 should be redrafted to provide a criteria-led policy approach.	DM31 includes requirements for specific levels of designation and includes reference to protecting and enhancing assets and contributing to ecological networks. Such requirements would not change with the introduction of a criteria based policy which would essentially be a re-wording of the policy.
5539	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Home Builders Federation Ltd (Mr James Stevens) [283]	Parts of the policy are unsound as they are contrary to national policy.	The Council's response to Matter 4a explains how policy CS1 is sound.

5540	Proposed Submission Core Strategy and Policies	DM33 - Green Corridors	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Policy DM33 is inconsistent with other plan policies which allocated land for development. The way in which green corridors within allocated development sites should be considered must be clarified through amendments to the Policy. The Key Diagram/DM33 provide a very broad definition of the location and width of green corridors. It is therefore unclear how development proposals will be assessed against the policy in the absence of any clear definition of the physical extent of the corridors. On sites such as the IGS, directly applying the provisions of DM33 would sterilise large swathes of the IGS from built development.	Paragraph 9.209 states that the Council will produce a more detailed map. In the meantime, the policy is clear that green corridors are not necessarily subject to blanket protection and policy CS10 together with the adopted interim SPD for Ipswich Garden Suburb are clear in setting out the green infrastructure for the area.
5541	Proposed Submission Core Strategy and Policies	8.213 (CS20)	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	Unless substantive evidence of progress on planning for a northern bypass can be demonstrated, paragraph 8.213 is simply an aspirational remark and should be deleted. Paragraph 8.213 continues to raise the prospect of a northern bypass, which has been under consideration for decades, but has limited prospect of delivery in the absence a delivery mechanism. If it were to be brought forward, it would be a significant influence on Ipswich's development strategy, including IGS. Therefore, the Council should be careful in pushing the agenda for a bypass without there being a more certain prospect of this option being properly investigated.	Suffolk County Council's letter dated 24th May 2016 (PSCD18a) in response to the Transport Assessment (PSCD18) states that 'Studies are ongoing into the need for additional road capacity to the north of Ipswich' and it is therefore appropriate for this paragraph to remain.
5542	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3.	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	We consider that the objective of securing at 35% affordable housing within the Ipswich Garden Suburb is unsound since it is neither justified by the evidence presented by the Council in its evidence base, neither is it effective since this provision is demonstrably not capable of being achieved under prevailing conditions of viability. A full representation is submitted against Policy CS12.	The justification for 35% affordable housing is explained in the Ipswich Whole Plan Viability Study commentary (LPCD27) and the Ipswich Garden Suburb Viability Testing Final Report (PSCD23).
5543	Proposed Submission Core Strategy and Policies	6.17	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The Spatial Strategy under Section 6.9 of the Plan fails to give adequate emphasis to the Ipswich Garden Suburb as a key element of the spatial strategy for Ipswich. We do not consider that this provides for effective plan-making. Section 6.9 is heavily weighted in favour of the town centre and waterfront. IGS is referenced in a single sentence only (6.17), but is the single largest source of new homes (including family homes) proposed. IGS, which is essential to Ipswich's growth and prosperity, must be given prominence in the spatial strategy so Borough-wide infrastructure and investment decisions can be made.	Through the Pre-Submission Additional Modifications the Council has strengthened reference to the Ipswich Garden Suburb in paragraph 6.17.
5544	Proposed Submission Core Strategy and Policies	10. Table 8B	CBRE and Mersea Homes (Mr Arwel Owen) [1450]	The provisions set out in Table 8B are not justified by detailed evidence and does not provide an effective basis for implementation of the Plan over its plan period. Strategic infrastructure headings should be identified alongside mechanisms for delivery of those items, with detailed information about triggers agreed through the determination of planning applications, in accordance with paragraph 177 of the NPPF.	The delivery mechanisms for infrastructure related to the Ipswich Garden Suburb are being established through the production of the Infrastructure Delivery Plan.
5545	Proposed Submission Core Strategy and Policies	CS6: The Ipswich Policy Area	Home Builders Federation Ltd (Mr James Stevens) [283]	The plan is unsound because it is not based upon constructive cooperation that will address the unmet need of the HMA.	These points were discussed at the Stage 1 hearings in March 2016.
5546	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Home Builders Federation Ltd (Mr James Stevens) [283]	Policy CS7: The amount of new housing required  The policy is unsound because:  a) it is questionable whether the figure of 13,550 (as set out in paragraph 8.77) is properly representative of the objectively assessed housing need for Ipswich	These points were discussed at the Stage 1 hearings in March 2016.
5547	Proposed Submission Core Strategy and Policies	Table 3 - Estimated Housing Delivery for 2014-2031 Excluding Current Permissions as at 1st April 2014	Home Builders Federation Ltd (Mr James Stevens) [283]	The Council expects a total of 1,800 dwellings to materialise in the form of windfall development over the plan period with 90% of these being on brownfield land (see also paragraph 48 of the Housing Topic Paper). This is a quite a substantial figure and it would be helpful if the Council provided some evidence to justify its assumption	The windfall figure is based upon past rates of development coming forward on unidentified sites. This includes dwellings coming forward through Permitted Development rights which have recently contributed substantially to supply.
5548	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	Home Builders Federation Ltd (Mr James Stevens) [283]	Policy CS12: Affordable housing The affordable housing policy is potentially unsound because the rates proposed may render the plan undeliverable and therefore the policy may prove ineffective. It is also unclear how a policy requirement of 35% and 15% affordable housing by total floor space would work in practice. It is unclear how this would translate into a dwelling requirement. An allowance of £1,000 per plot for planning obligations in the Viability Testing report seems low.	The Council currently operates its affordable housing policy based upon floorspace. The viability is explained in the Council's commentary on the Viability Testing of the Ipswich Development Plan report (LPCD27). The viability assessment considered that contributions of £1,000 per plot are achievable alongside the other policy requirements. If at the application stage it becomes apparent that higher contributions are necessary the Council would need to consider this alongside the policy requirements in considering the viability of proposals.
5549	Proposed Submission Core Strategy and Policies	DM1 - Sustainable and Construction	Home Builders Federation Ltd (Mr James Stevens) [283]	Policy DM1: Sustainable design and construction  Elements of the policy are unsound because the requirements conflict with national policy.	Policy DM1 is consistent with the provisions of Section 1(c) of the Planning and Energy Act 2008 which enables planning authorities to set energy efficiency standards that exceed the requirements of Building Regulations. The requirements for water use are consistent with the Government's policy in the Planning Practice Guidance relating to setting the 'optional' water use Building Regulations requirement.
5550	Proposed Submission Core Strategy and Policies	DM2 - Decentralised Renewable or Low Carbon Energy	Home Builders Federation Ltd (Mr James Stevens) [283]	The policy is unsound because it is contrary to national policy.	Policy DM2 is consistent with Sections 1(a) and (b) of the Planning and Energy Act 2008 which allows planning authorities to require a proportion of energy used in development to be from renewable or low carbon sources in the locality of the development.
5551	Proposed Submission Core Strategy and Policies	DM3 - Provision of Private Outdoor Amenity	Home Builders Federation Ltd (Mr James Stevens) [283]	This policy is unsound because it is unjustified.	The Council sees the required minimum garden sizes for larger houses as a key component of creating greener and more sustainable living environments by providing more space for planting and other garden activities. The policy has been implemented satisfactorily since adoption of the Core Strategy in 2011. Adequate garden space is important for residential amenity and to accommodate sustainable drainage where appropriate.
5552	Proposed Submission Core Strategy and Policies	DM5 - Design and Character	Home Builders Federation Ltd (Mr James Stevens) [283]	Part 1 of the policy requiring the provision of public art is contrary to the advice in the NPPG and we recommend this should be deleted.	Public art provided as a consequence of the approval of major development schemes has social, environmental and cultural benefits. It also supports the regeneration of existing areas and reinforces the identity of new ones (such as at Ravenswood). Thus public art can make an important contribution to place making and the public realm. The policy allows the need for public art to be considered on a site by site basis. The Council approved Public Art Policy Commissioning Guidelines on 13th July 2010.
5555	Proposed Submission Core Strategy and Policies	4.4	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The Local Plan is not legally compliant and fails to comply with the duty to co-operate by failing to appropriately 'identify significant cross boundary and inter-authority issues' and by failing to ensure that the plan rests on a credible evidence base. It also fails on duty to co-operate with adjacent local authorities, and with the Marine Management Organisation. If the plan cannot demonstrate effective joint working to meet cross-boundary strategic priorities, the public fear their quality of life, health and wellbeing will be at stake. The plan fails to demonstrate a positive approach to 'Localism'. Endorse NPPG points also.	Duty to Co-operate was discussed at the Stage 1 hearings and are addressed in the Inspector's Interim Findings report dated 19th April 2016. See Appendix 1 to this table - 'Ipswich Garden Suburb'
5556	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCS major concern relates to non compliance of CS1 with the NPPF. Traffic problems, congestion & gridlock fail NPPF requirements for no 'serious adverse effects'. Air Pollution, increased human mortality and Public Health risks from traffic are identified in 2000 as a serious and growing problem in Ipswich which mitigation measures appear not to have alleviated. IBC hasn't the capacity to control likely serious adverse impacts via DM Policies on Transport, Traffic congestion, Air Pollution, Flood Risk, Potable Water and Sewage Requirements. There is insufficient work on likely Climatic Change impacts and Cumulative Impacts with Suffolk Coastal District growth plans.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5557	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Westerfield Parish Council (Mr Peter Miller) [235]	The Ipswich Garden Suburb is located in an area which is away from the areas of main employment and the town centre. It is unlikely many of the residents of the proposed 3,500 houses will walk or cycle to work, and direct transport connections will only be to the town centre. So, although the need to travel will be minimised through the existence of local services on site, as far as employment accessibility is concerned, we doubt whether this aspiration will be met.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5558	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	Westerfield Parish Council (Mr Peter Miller) [235]	Policy CS9 Previously Developed land Westerfield Parish Council supports the policy of focussing on previously developed (brownfield) land first.	This support is welcomed.
5560	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Westerfield Parish Council (Mr Peter Miller) [235]	Policy CS10 Ipswich Garden Suburb Westerfield Parish Council is concerned over the effect the development will have on the rural character of Westerfield Road. However Westerfield Parish Council is supportive of steps taken to maintain Westerfield's independence, by ensuring any development has an appropriate physical separation from the village. This council also supports the provision of a country park in the proposed location.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5561	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Westerfield Parish Council (Mr Peter Miller) [235]	The policy indicates that housing allocation is mainly justified by job growth in the Ipswich Policy area. Job growth has stalled over the last few years and the global economic growth forecast for the foreseeable future is not good. Although we support job growth, the figure of 12,500 within the Ipswich boundary which equates to a 17% increase, seems optimistic.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5562	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Westerfield Parish Council (Mr Peter Miller) [235]	Policy CS17 Infrastructure The policy states that housing growth should not adversely affect the quality of life of existing communities. It also says that growth requirements across the Borough will place additional pressure on existing infrastructure and will therefore require improvements to be made to existing infrastructure, and the provision of new infrastructure. Westerfield Parish Council supports the strategy to deliver the key infrastructure requirements listed in this policy to ensure existing communities, including Westerfield, can be sustained.	This support is welcomed.

5563	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Westerfield Parish Council (Mr Peter Miller) [235]	Clarification is needed on the Travel Ipswich scheme to reduce car dependency by 15% over the lifetime of the plan. Is it just within the town centre or the whole of the borough? Does it include the Garden Suburb, which on its own is expected to generate a significant increase in car usage?	Travel Ipswich applies to the whole Borough although works themselves have been largely focussed on the town centre. The basis for mitigation measures related to travel generated by the Garden Suburb is set out in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (ICD55).
5565	Proposed Submission Core Strategy and Policies	Chapter 10: Implementation	Westerfield Parish Council (Mr Peter Miller) [235]	Westerfield Parish Council is concerned that little detail is given on how some of the necessary utility services will be implemented to show the services meet the requirement of both the development and do not have any permanent adverse affect on existing communities. The main services of concern are management of surface water drainage and foul waste. However Westerfield Parish Council supports the inclusion of detailed infrastructure requirements and the trigger points for the Garden Suburb in the core strategy.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5566	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Concerned about how infrastructure will cope with growth, including hospitals, schools, GPs, social care, drainage, sewerage, transport. Support the aspiration to identify the infrastructure required to deliver development, but wish to see developer contributions for major "off-site" road infrastructure discussed within this plan and the obligation to mitigate adverse traffic effects reinstated. There is no indication of how necessary infrastructure can be achieved. Requirements are unlikely to be met in a timely, sustainable manner. If the plan cannot demonstrate effective joint working to meet cross-boundary strategic priorities, we fear Quality of Life will be at stake. Endorse NFFPG points also.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5567	Proposed Submission Core Strategy and Policies	1.2	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs support extending the plan period from 2027 to 2031.	This support is welcomed.
5568	Proposed Submission Core Strategy and Policies	2.1	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The manner of "last minute", poorly drafted "revisions" to the Executive paper on the 15th October [2013] on CS10 were unacceptable, and in breach of protocols and SCI. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the public interest. The revisions make a fundamental change in direction that has "seriously undesirable unintended consequences" which should be properly referenced, appraised and evaluated within the SA. The CS10 changes are not properly referenced nor track-changed within the SASR.	The Executive report sought approval to consult on the Draft Core Strategy and Policies DPD Review. Full public consultation was undertaken between January and March 2014 in accordance with the Statement of Community Involvement. The Interim Sustainability Appraisal Report (LPCD19) assessed the Draft Core Strategy and Policies DPD Review.
5569	Proposed Submission Core Strategy and Policies	DM21 - District and Local Centres	Planware Ltd (Donna Smith) [1223]	Planning policy must be consistent with the principles set out within the Framework. Each policy should "plan" positively for development, be justified, effective, and consistent with the Framework. If any policy that is not compliant with one of these four tests, it cannot be considered sound (see the Framework).	Noted.
5571	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Endorse the Northern Fringe Protections Group's points also.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5573	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Object to the requirement for 13,500 homes. It requires a big increase on current building levels and those since 2008. SOCS do not support this figure as justified or necessary. IBC appear to be "letting the tail wag the dog." Threats from unsustainable development via the lack of 5 year supply, should not force the Borough into proposing an inadequate plan. The plan must have balance and be both job and homes led. Growth should not be a "given" if the circumstances are adverse and dictate otherwise. Localism (public views) should be given greater weighting. Endorse NFFPG points also.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5574	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Ipswich Conservative Group [1814]	The Plan's strategy is no longer employment led, but has been changed to a housing needs led strategy - 13,350 new dwellings to be built by 2031. The result is that the jobs target has fallen out of kilter with the housing target. This is a move in the wrong direction as the emphasis on housing reduces the priority that should be put on jobs.	The Council's Housing and Employment Integration Statement (PSCD08) explains the relationship between the housing figure and the jobs figure.
5575	Proposed Submission Core Strategy and Policies	CS8: Previously Developed Land	Ipswich Conservative Group [1814]	The importance of Brownfield sites is not emphasised enough in the Development Plan.  In an urban environment like Ipswich, it is clearly important that maximum use should be made of brownfield sites as a means of meeting housing needs. Brownfield development should be prioritised.	The policy establishes the important principle that the Council will focus development on previously developed land first, whilst recognising that greenfield development will also have an important role to play in meeting objectively assessed housing need. Urban regeneration remains a fundamental aim of the strategy, which nevertheless needs to recognise that greenfield development will also be needed.
5576	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Cyril Eden [549]	Concerned over the loss of land for food production. It is presumed that traffic impacts have been carefully examined. Concern over potential traffic safety impacts for pedestrians on Henley Road railway bridge. Will this be a pretty garden suburb or a severely congested small town? Delivery of the whole Garden Suburb may not be viable over the timescale of the Plan. The Plan should be based on close co-operation with neighbouring authorities. Population forecasts should not be based on high immigration. Delivery of the Country Park in a timely manner cannot be guaranteed.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5577	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	Ipswich Conservative Group [1814]	The percentage of affordable housing is too high and unrealistic. It affects the viability of the Northern Fringe site (Ipswich Garden Suburb) and adds to the financial burden on first time buyers.	The justification for 35% affordable housing is explained in the Ipswich Whole Plan Viability Study commentary (LPCD27) and the Ipswich Garden Suburb Viability Testing Final Report (PSCD23).
5581	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Save Our Country Spaces (Mrs Barbara Robinson) [978]	How will infrastructure be provided for 3,500 dwellings at IGS plus 10,000 homes elsewhere? Will the Country Park be delivered in a timely/successful fashion? The Multi-start approach is not sustainable and may cause environmental damage, loss of quality of life, the imposition of high urban densities, and loss of soil, biodiversity, heritage, trees and ancient hedgerows, and prime food growing farmland. It is unacceptable. Multi-starts may infringe Human Rights (case law re. freedom from noise pollution in Copenhagen). Need a moratorium from growth pressures so IBC can address long term issues, e.g. resourcing major road infrastructure. Endorse NFFPG points also.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5583	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Ipswich Conservative Group [1814]	A reduction of 15% in the use of cars is not realistic.  The impact of the extensive additional housing on the transport infrastructure of the town also gives cause for concern. The current road network is already under pressure and will find it difficult to cope with the extra traffic generated by the new housing. Air quality will also be put at risk.	The 15% target is set by the Travel Ipswich scheme. The Local Plan contains policies which seek to reduce dependency on the private car.
5584	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Are 13,500 homes needed, are they desirable, and are they deliverable? SOCS do not support this figure as justified or necessary. SOCS believe the 12,500 jobs target is unrealistic and undeliverable. There has been no real jobs growth since 2001 and public sector jobs are set to reduce. This is unsustainable and not compliant with the NPPF. Endorse NFFPG points also.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5587	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The target of 12,500 jobs to be delivered 2011-2031 is unrealistic and undeliverable as to date there has been no real jobs growth since 2001 and public sector jobs are set to reduce. This is unsustainable and non compliant with the NPPF. SOCS support the aspiration but believe that according to our research and evaluation over time, since 2001, that there is no indication as to how this can or will be achieved. Endorse the Northern Fringe Protection Group's points also.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5590	Proposed Submission Core Strategy and Policies	CS3: IP-One Area Action Plan	Ipswich Conservative Group [1814]	The Conservative Group supports the principle of developing and regenerating the town centre to boost employment in the town. It is important that Ipswich is developed as a successful shopping centre.	This support is welcomed.
5591	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Will the proposed retail and shopping centre plan be achievable and make Ipswich a better place? SOCS endorse the Northern Fringe Protection Group's points also.	The retail proposals in CS14 take forward the recommendations of DTZ Report (ICD15) and are explained in the Town Centre and Retail Topic Paper (LPCD44).
5593	Proposed Submission Core Strategy and Policies	CS11: Gypsy and Traveller Accommodation	National Federation of Gypsy Liaison Groups (Mr Roger Yarwood) [1213]	Whilst the policy is generally supported, the requirement that sites should "where possible" be within 1km of services including public transport is too prescriptive, albeit ineffective.	The words 'where possible' were deleted through the Pre-Submission Main Modifications.
5598	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	WM Morrison Supermarkets Plc Ltd (Mr Mark Batchelor) [1208]	The wording of the draft Core Strategy is vague. The apparent requirement for an RIA (Retail Impact Assessment) for retail schemes of 200sqm and above is draconian and instead a threshold of 1,000sqm should be adopted.	The 200sqm thresholds reflect the size of many town, district and local centre units which could be impacted upon. See paragraphs 81-83 of the Town Centre and Retail Topic Paper (LPCD44).
5599	Proposed Submission Core Strategy and Policies	DM23 - Retail Proposals Outside Defined Centres	WM Morrison Supermarkets Plc Ltd (Mr Mark Batchelor) [1208]	The wording of the draft Core Strategy is vague. The apparent requirement for an RIA (Retail Impact Assessment) for retail schemes of 200sqm and above is draconian and instead a threshold of 1,000sqm should be adopted.	The 200sqm thresholds reflect the size of many town, district and local centre units which could be impacted upon. See paragraphs 81-83 of the Town Centre and Retail Topic Paper (LPCD44).
5600	Proposed Submission Core Strategy and Policies	DM1 - Sustainable and Construction	WM Morrison Supermarkets Plc Ltd (Mr Mark Batchelor) [1208]	The requirements of the policy are too stringent. Viability should be taken into account or else the policy could prevent development from coming forward.	The standards were revised from a requirement for 'Excellent' in the Draft Core Strategy and Policies Focused Review (Oct 2013) to 'very good' in the Proposed Submission Core Strategy, reflecting the conclusions of the Viability Testing of the Ipswich Development Plan report (LPCD26). DM1 contains flexibility for circumstances where it can be demonstrated that meeting the requirements is not viable.
5604	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Mrs Mavis Hammond [864]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. On Henley Road there are queues at every junction and lorries thundering past. Congestion is far worse than it ever was.	See Appendix 1 to this table - 'Ipswich Garden Suburb'

5608	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Mrs Mavis Hammond [864]	Will this be achievable and make Ipswich a better place? A reduction in shop rents should be encouraged so that our shopping centres are more diverse and interesting.	The retail proposals in CS14 take forward the recommendations of DTZ Report (ICD15) and are explained in the Town Centre and Retail Topic Paper (LPCD44). Reducing shop rents is beyond the scope of the Local Plan.
5616	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	Ashfield Land Limited (Mr Paul Derry) [1122]	Objective 3 of the adopted Core Strategy requires that 18,000 additional jobs are to be provided in the Ipswich Policy Area between 2001 and 2025 (draft policy CS13 of the draft Core Strategy and Policies Development Plan Document) encourages the provision of in the region of 12,500 jobs between 2011 and 2031). In accordance with this objective, it is estimated that the Ipswich Business Park has the capacity to generate up to 2,000 new jobs within the B1, B2 and B8 Business use classes.	Noted. (Note the jobs target in Objective 3 is approximately 12,500 jobs).
5617	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Save Our Country Spaces (Mrs Barbara Robinson) [978]	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site. [SOCS endorse Northern Fringe Protection Group points also].	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5622	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr & Mrs David and Eileen Warren [1104]	Will your plans protect our health and deal with pollution?	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5623	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Mr & Mrs David and Eileen Warren [1104]	There are transport issues and the traffic proposals policies CS5, CS17 and CS20 do not address these.	These policies should be read alongside DM17 and DM18 which set out specific requirements for new development in respect of transport. See Appendix 1 to this table - 'Ipswich Garden Suburb'. (Note comment is made with reference to Ipswich Garden Suburb)
5624	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr & Mrs David and Eileen Warren [1104]	There are transport issues and the traffic proposals policies CS5, CS17 and CS20 do not address these. It seems that the current services in hospitals, schools, GP surgeries and social care are inadequate. The proposals do not address the infrastructure, services, drainage, flooding and sewerage.	See Appendix 1 to this table - 'Ipswich Garden Suburb'. (Note comment is made with reference to Ipswich Garden Suburb)
5625	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Mr & Mrs David and Eileen Warren [1104]	There are transport issues and the traffic proposals policies CS5, CS17 and CS20 do not address these.	See Appendix 1 to this table - 'Ipswich Garden Suburb'. (Note comment is made with reference to Ipswich Garden Suburb)
5626	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr & Mrs David and Eileen Warren [1104]	With specific reference to the Northern Fringe and the Country Park, I understand that delivery is unlikely until 2025 and that you propose a multi start development and immediate removal of trees, hedgerows and habitats and farmland, much of which directly affects the existing housing stock on the perimeters of the proposed development. There seems to be a conflict between existing Orders and what is proposed. Sadly, the Council's Core Strategy seems to be led by developers and not the Council as evidenced by the inadequacies of the existing Master Plan exposed by the planning applications made.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5627	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	P.A. Lawson [1103]	There are numerous "Brown Field" sites in Ipswich and these have acres of land that are eminently suited to housing development without the need to take away prime agricultural land that is needed to feed the growing population of the United Kingdom. The traffic that will be generated by these additional homes will overwhelm the road network in the immediate vicinity of the proposed development. (They struggle to cope with the current volume of vehicles). The proposal of tinkering with a couple of road junctions will not solve the problem. Major road works are needed to accommodate residents vehicles.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5629	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr Mervyn Sheppard [1102]	The CS fails to properly assess development and infrastructure requirements including the cumulative effect of traffic and air pollution. In particular it fails to demonstrate that the Northern Fringe Development would not increase traffic congestion and traffic on the surrounding roads to unacceptable levels. The absence of new roads or sufficient upgrades of existing routes in North East Ipswich indicates that the Council is not taking the additional traffic that will be generated from the Development seriously.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5630	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Mr Mervyn Sheppard [1102]	The CS fails to properly assess development and infrastructure requirements including the cumulative effect of traffic and air pollution. In particular it fails to demonstrate that the Northern Fringe Development would not increase traffic congestion and traffic on the surrounding roads to unacceptable levels. The absence of new roads or sufficient upgrades of existing routes in North East Ipswich indicates that the Council is not taking the additional traffic that will be generated from the Development seriously.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5632	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Dr. I Hawker [1086]	Object to the garden suburb on the grounds of loss of countryside, traffic generation and impact on wildlife.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5633	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Tony Moran [1081]	We already have significant and chronic issues relating to infrastructure and surface drainage, flooding and sewerage. The proposals will only add to these and not improve matters. Heavy rainfall and flash flooding are an increasing feature of our weather patterns and this will not improve matters. CS1 CS17 & CS20	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5634	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Mr Tony Moran [1081]	The transport issues and proposals ref. CS5, CS17 and CS20 are not adequately dealt with and will result in many years of gridlock and adverse impact for both residents and businesses alike in the north of Ipswich. This will have knock-on impact elsewhere in the town as drivers seek to avoid pinch points. The plan will not remedy or provide sufficient mitigation against this.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5635	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Tony Moran [1081]	The delay in the provision of the Country Park with a multi-start development of housing does not inspire confidence that the park will be delivered and be pushed to the side with further delays. Removal of trees, hedgerows, habitats and farmland without immediate replacement by the country park is not an acceptable proposal - the development of the Country Park should be at the very early stages of the Plan. CS1.4 & CS10	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5636	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Mr Tony Moran [1081]	Are 13,500 new homes really required, are they truly needed let alone desirable? - CS7	This was considered at the Stage 1 hearings and is addressed in the Inspector's Interim Findings report dated 19th April 2016. See Appendix 1 to this table - 'Ipswich Garden Suburb'
5637	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mr Tony Moran [1081]	There is little clear evidence that the number of new jobs referred to in Para 6.8 Objective(b) & CS13 are a realistic forecast. With the decline in local government employment and that of other local major employers, the generation/origin of 2500 net new jobs needs to be properly split out.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5638	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr Tony Moran [1081]	We already have significant and chronic issues relating to infrastructure and surface drainage, flooding and sewerage. The proposals will only add to these and not improve matters. Heavy rainfall and flash flooding are an increasing feature of our weather patterns and this will not improve matters. CS1 CS17 & CS20	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5639	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Mr Tony Moran [1081]	The transport issues and proposals ref. CS5, CS17 and CS20 are not adequately dealt with and will result in many years of gridlock and adverse impact for both residents and businesses alike in the north of Ipswich. This will have knock-on impact elsewhere in the town as drivers seek to avoid pinch points. The plan will not remedy or provide sufficient mitigation against this.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5640	Proposed Submission Core Strategy and Policies	CS8: Housing Type and Tenure	Mr Philip Richardson [1078]	Too many flats are going up all over the area. What is needed is more community space for families and other community groups	Policy CS8 requires a mix of house types.
5641	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr David Gazeley [530]	Traffic issues around the garden suburb proposal, by pass required prior to development	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5642	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Rani Pert [456]	Objection to traffic generated by the garden suburb development.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5643	Proposed Submission Core Strategy and Policies	Chapter 2: The Planning System	Marine Management Organisation (Susan Davidson) [1004]	Chapter 2 includes several references to the National Planning Policy Framework. It would be beneficial to also include reference to the Marine Policy Statement (MPS) and East Marine Plans. The East Inshore and East Offshore Marine Plans provide guidance for sustainable development in English waters, and cover the coast and seas from Flamborough Head to Felixstowe. The Marine Policy Statement will also guide the development of Marine Plans across the UK.	Through the Pre-Submission Additional Modifications the Council has proposed an amendment to 8.188 to include reference to the East Inshore and East Offshore Marine Plans.
5644	Proposed Submission Core Strategy and Policies	Chapter 6: Vision and Objectives	Marine Management Organisation (Susan Davidson) [1004]	Chapter 6 - Within this chapter the waterfront is mentioned but not in relation to tourist facilities. The development and use of the waterfront as a marina is in-line with MPS. Within the MPS section 3.11 the importance of the sea in tourism and recreation is highlighted, and as a result can help link to marine planning.	Policy SP11 of the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document supports tourism uses at the Waterfront.
5645	Proposed Submission Core Strategy and Policies	CS4: Protecting our Assets	Marine Management Organisation (Susan Davidson) [1004]	Policy CS4 - this policy would benefit from making reference to the East Offshore and East Inshore Marine Plans, specifically policy MPA1. Within this policy RAMSAR and SPA sites do cross into the South East marine plan area.	Through the Pre-Submission Additional Modifications the Council has proposed additional text in paragraph 8.52 in relation to the Inshore Marine Special Protection Area.

5646	Proposed Submission Core Strategy and Policies	CS18: Strategic Flood Defence	Marine Management Organisation (Susan Davidson) [1004]	Policy CS18 - as Ipswich Borough Council falls within a neighbouring reporting area any climate change mitigation measures should reference policy CC1 within the East Offshore and East Inshore Marine Plans.	Through the Pre-Submission Additional Modifications the Council has proposed an amendment to 8.188 to include reference to the East Inshore and East Offshore Marine Plans.
5653	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Jane Catling [1620]	Northern Fringe delivery may not be viable over the plan timescales. Plan should be based on co-operating more closely with neighbouring LAs. Plan cannot guarantee timely delivery of the Country Park and so demonstrate it won't harm the integrity of a European designated habitat. Multi-site starts will result in severe congestion and damage the future attractiveness and prosperity of Ipswich. With few new jobs being created in the town centre, residents will have to commute. Where will they park? The land is prime agricultural land. Ponds will not work adequately on clay. Brownfield sites should be developed first.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5655	Proposed Submission Core Strategy and Policies	CS8: Housing Type and Tenure	Mrs Jane Catling [1620]	Attractive larger homes are needed as well as those proposed on the original plans for the northern fringe.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5656	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mrs Jane Catling [1620]	Traffic congestion is a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Updated traffic and air quality modelling should be undertaken and development not permitted unless effective mitigation can be implemented. Fresh/waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified. There is a lack of sewage pipeline capacity between the Garden Suburb and Cliff Quay treatment works. Concerns over provision of sufficient medical care, surgeries are already at capacity.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5664	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Helen Mason [640]	Concerned that traffic impacts have not been considered. Concerned that increases in usage on Colchester Road, Valley Road, Tuddenham Road and Westerfield Road will worsen congestion. People will not use cycles or public transport. More thought should be given to improving road links, concerned that there are no plans to improve hospitals or GP facilities. Concerned that schools will be expected to cope with additional pupils without any new schools or improvements. Concerned that the development is being hurried through, often rather secretly, without consideration of existing residents.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5665	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mrs Helen Mason [640]	Where will people in the 12,500 new jobs go for medical assistance? Concerned that there are no plans for improved hospital or GP facilities to cope with increased usage.	The need for new medical facilities is considered in relation to the location of new homes. New medical facilities are proposed as part of the Ipswich Garden Suburb and as part of the development on the Tooks Bakery site.
5666	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Bridges [1618]	Going north on Westerfield Road, the field adjacent the road before the houses on the left has always been waterlogged even after drainage improvements. Building on the land will worsen drainage at Westerfield which is lower. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5675	Proposed Submission Core Strategy and Policies	DM6 - Tall Buildings	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The 91.4m height consultation zone has been added to the site sheets through the Pre-Submission Additional Modifications.
5676	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Mr Bridges [1618]	Will this be achievable and make Ipswich a better place?	The retail proposals in CS14 take forward the recommendations of DTZ Report (ICD15) and are explained in the Town Centre and Retail Topic Paper (LPCD44).
5679	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Bridges [1619]	Going north on Westerfield Road, the field adjacent the road before the houses on the left has always been waterlogged even after drainage improvements. Building on the land will worsen drainage at Westerfield which is lower. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5685	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	Mrs Bridges [1619]	Will this be achievable and make Ipswich a better place?	The retail proposals in CS14 take forward the recommendations of DTZ Report (ICD15) and are explained in the Town Centre and Retail Topic Paper (LPCD44).
5688	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Chris Wall [1614]	Object to Garden Suburbs on grounds of design, traffic congestion, air quality and drainage	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5689	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mrs Chris Wall [1614]	Not enough jobs in central Ipswich to warrant all the new housing	The Council's Housing and Employment Integration Statement (PSCD08) explains the relationship between the housing figure and the jobs figure.
5690	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mr Julian Mason [639]	Assumptions regarding jobs growth. To achieve the projected numbers of new jobs, Ipswich would have to enjoy economic growth far in excess of the current situation here or elsewhere nationally. Please identify the special features of the local economy that would justify this exceptional growth. Without convincing evidence that these figures are achievable, many other elements of the strategy are put in doubt. A recent report by Peter Brett Associates questions the viability of developing new offices, industrial units, etc. within Ipswich. This also calls into doubt the likelihood that the ambitious growth figures will be achieved.	The Employment Topic Paper (LPCD40) explains the rationale behind the jobs figures.
5691	Proposed Submission Core Strategy and Policies	4.2	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse NFPG points. Until recently there has been little public evidence around engaging and reaching agreement with neighbouring authorities on housing, economy and infrastructure despite the IPA Board. Ipswich was not involved in the commissioning of the 2012 Strategic Housing Market Assessment. Welcome the more recent increased frequency of meetings and transparency of the Board. There is no evidence of strategic policy outcomes from the IPA. There are no published joint topic papers. Individual jobs targets for Ipswich and neighbouring authorities are unrealistic when compared with the January 2015 East of England Forecasting Model forecasts.	This was considered at the Stage 1 hearings and is addressed in the Inspector's Interim Findings report dated 19th April 2016. See Appendix 1 to this table - 'Ipswich Garden Suburb'
5692	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse Northern Fringe Protection Group points. The proposed removal of the 60% target for development on brownfield land is a negative step.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5693	Proposed Submission Core Strategy and Policies	10: Table 8A	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse Northern Fringe Protection Group points. There is no evidence of objectively assessed needs for freshwater and foul water infrastructure or to strategic solutions, and no listing in the infrastructure tables.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5694	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Mr Julian Mason [639]	You state that house prices in Ipswich are below the national average. Surely by the laws of supply and demand this would imply there is an excess rather than shortfall of housing. You only have to compare prices here with those in nearby locations with a genuine shortfall (for example Cambridge) to see this in practical effect. So the large-scale increase in housing stock that the strategy calls for is unjustified.	This was considered at the Stage 1 hearings and is addressed in the Inspector's Interim Findings report dated 19th April 2016. See Appendix 1 to this table - 'Ipswich Garden Suburb'
5695	Proposed Submission Core Strategy and Policies	8.205	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Air quality issues, which are likely to be made worse by increasing traffic congestion, may also impact on the effectiveness of the Core Strategy. The 2014 Air Quality Annual Report (July 2014) shows exceedances of nitrogen dioxide at locations within and outside of the Air Quality Management Areas. The Council needs to provide evidence that air pollution will not breach legal limits.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5696	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	Mr Julian Mason [639]	The development of the garden suburb is questionable. The council should revisit assumptions and models. It is probable that development of brownfield sites would be sufficient for a more realistic (and modest) growth in demand.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5697	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protections Group's points. The Ipswich Viability Report showed that 'the indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure.' It is therefore unsound to set a target of 35%. Since the Garden suburb infrastructure costs were developed other costs have arisen due to wastewater infrastructure.	The justification for 35% affordable housing is explained in the Ipswich Whole Plan Viability Study commentary (LPCD27) and the Ipswich Garden Suburb Viability Testing Final Report (PSCD23).
5698	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Julian Mason [639]	The garden suburb proposals do not sufficiently consider the additional infrastructure requirements that a large development of this type would demand. Traffic is the obvious issue at the suburb would necessitate a Northern bypass to accommodate the huge rise in vehicular traffic. Other considerations would be health, schools, pollution and waste-water.	See Appendix 1 to this table - 'Ipswich Garden Suburb'

5699	Proposed Submission Core Strategy and Policies	6.7 The Vision	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the NFPG's points. Support the vision but consider the strategy will not deliver it. The development of the Garden Suburb will result in severe congestion in north Ipswich and the town centre. Proposals to increase opportunities for buses, walking and cycling to the town centre are flawed as evidence challenges the viability of job creation in the town centre. Homes growth without jobs and sustainable transport will result in more commuting. This will harm prospects for investment. Updated traffic modelling and air quality modelling must be undertaken.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5700	Proposed Submission Core Strategy and Policies	8.21	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the NFPG's points. The Core Strategy fails to take sufficient account of the waste water issues arising from proposed expansion of Ipswich. The Draft Strategic Economic Plan identified the scale and cost of new connections as inhibiting development of some strategic sites. The Water Cycle Study shows that significant upgrading is required to wastewater treatment capacity. The pipeline from north Ipswich to Cliff Quay is at capacity and no viable solutions for the Garden Suburb have been proposed. This could seriously undermine the delivery of the Core Strategy.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5704	Proposed Submission Core Strategy and Policies	8.28	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Support the strategy of urban renaissance in Ipswich and note the first bullet point 'it will maximise opportunities to re-use previously developed land within central Ipswich.' The proposed removal of the 60% target for development on brownfield land is a negative step. With the multi-site development of the Garden Suburb concerned that developers will focus on greenfield development. This will have a detrimental impact on the regeneration of brownfield sites particularly in the town centre and deprived areas.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5705	Proposed Submission Core Strategy and Policies	8.52	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5706	Proposed Submission Core Strategy and Policies	10: Table 8B	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the NFPG's points. Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site. The Core Strategy fails to identify and plan for key strategic wastewater infrastructure. There is the possibility that a major new pipeline will be needed from the Garden Suburb to Cliff Quay.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5707	Proposed Submission Core Strategy and Policies	8.70 (CS6)	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's comments on 8.70 [CS6]. There is no public evidence on any strategic policy outcomes from the IPA. There are no joint Topic Papers on housing growth, jobs growth and strategic infrastructure. Evidence base documents referred to in 8.70 have not been made available which is in breach of the Development Plan Document process. The Core Strategy should better ensure effective co-operation between Ipswich Borough Council and neighbouring authorities.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5708	Proposed Submission Core Strategy and Policies	8.99 (CS9)	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points on 8.99 [CS9]. The NFPF encourages the re-use of previously developed land. The proposed removal of the 60% target for brownfield land development is a negative step. With multi-site development at the Northern Fringe, concerned that developers will focus on greenfield rather than brownfield. This will have a detrimental impact on the regeneration of brownfield sites.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5709	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr Mark Tweedale [1612]	It would appear that Ipswich Borough Council has omitted the necessary up-front details from the Core Strategy Plan as to how it intends to implement the infrastructure required for the development of the Ipswich Garden Suburb (Northern Fringe), including mitigation of impact due to: a large number of additional vehicles using the existing local network. Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5710	Proposed Submission Core Strategy and Policies	8.124 (CS12)	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points on 8.124 [CS12]. This paragraph risks concentrating affordable housing in certain phases rather than integrating affordable housing throughout the development. We are concerned about a concentration of council housing that will fail to create sustainable, inclusive and mixed communities in accordance with the NPPF. In this respect we note IBC's planning application for Ravenswood has been called in for inspection on this issue.	Through more detailed work on the IDP appropriate phasing for affordable housing will be factored in to ensure high concentrations of affordable housing are avoided and the communities being created are suitably mixed.
5712	Proposed Submission Core Strategy and Policies	CS16: Green Infrastructure, Sport and Recreation	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Concern that the Country Park may not be delivered if only 499 homes are developed in Henley Gate or if only the other two parts of the Garden Suburb are developed. If the Country Park is delivered later than 2021 or not at all this will adversely impact on the integrity of a European site.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5713	Proposed Submission Core Strategy and Policies	10: Table 8B	Mr Mark Tweedale [1612]	It would appear that Ipswich Borough Council has omitted the necessary up-front details from the Core Strategy Plan as to how it intends to implement the infrastructure required for the development of the Ipswich Garden Suburb (Northern Fringe), including mitigation of impact due to: demands on clean water supply and demands on sewerage systems. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution fresh water and wastewater. Freshwater and wastewater infrastructure needs to be objectively assessed and key infrastructure listed in the CS.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5714	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	Mr Mark Tweedale [1612]	The housing target Objective 3(a) is so poorly defined as to be ineffective and as such the CS is unsound. To improve housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and progress measured.	The objectively assessed housing need for Ipswich was considered through the stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
5715	Proposed Submission Core Strategy and Policies	8.177	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points on 8.177 [CS17]. Support the goal of ensuring Ipswich receives all the infrastructure it needs but are concerned that the proposed development of the Garden Suburb without adequate new road infrastructure will severely impact on traffic congestion and air quality and affect the quality of life of residents.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5716	Proposed Submission Core Strategy and Policies	8.213	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SSOCs endorse the Northern Fringe Protection Group's points on 8.213 [CS20]. Support the inclusion of paragraph 8.213 however disagree that it is not practical to include such a route in the strategy. In our opinion without some form of northern bypass the development of the Ipswich Garden Suburb is unsustainable and should not be supported due to traffic congestion and the potential damaging impact on air quality. Without the northern bypass or link road the CS is unsound and should be rejected.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5717	Proposed Submission Core Strategy and Policies	DM3 - Provision of Private Outdoor Amenity	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Object to the change from 'rear garden area' to 'private garden area' as this will result in much smaller dwelling plots, some with no rear gardens at all and more cramming together of properties including infill. Welcome the stipulation in 9.21 that 'garden sizes need to be calculated independently of any parking space(s) to be provided.'	The change reflects the fact that some private gardens are not located to the rear (e.g. at the side).
5718	Proposed Submission Core Strategy and Policies	9.21	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. We welcome the stipulation in Para 9.21 that 'Garden sizes need to be calculated independently of any parking space(s) to be provided.'	Noted.
5719	Proposed Submission Core Strategy and Policies	DM17 - Transport and Access in New Developments	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. It is unclear how 'significant adverse impacts' in bullet point (a) will be defined.	Suffolk County Council as Highway Authority would assess the impacts based on the Transport Assessment work to be submitted with planning applications and provide comments to IBC as Local Planning Authority. Ultimately the judgement of a proposals compliance with policy DM17 will rest with the LPA taking into account the comments from SCC and in the context of NPPF advice.
5720	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 10:	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection group's points. The target is very unambitious. Low income is a key factor in deprivation but is not included as an indicator. The Core Strategy needs to be more effective in tackling this issue.	The Local Plan can allocate land for development and support employment development but income levels are dependant on a range of other factors beyond the influence of the Local Plan.
5721	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 6:	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The CS relies heavily on a transport modal shift from cars to more sustainable modes such as walking, cycling and public transport. This will be challenging and it is suggested that an additional indicator of the Census travel mode to work data be included to improve soundness.	Through the Pre-Submission Additional Modifications the Council has proposed a new indicator which is 'mode of travel to work (census)'. .
5722	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 12:	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The proposed indicator is vague and gives no measure of beneficial outcomes from working together on jobs growth, housing growth or strategic infrastructure.	The Council has, through its October 2015 Local Development Scheme, set a timetable for work on joint or aligned local plans. Progress on plans identified in the Local Development Scheme is reported on in the Annual Monitoring Report. Monitoring of the implementation of joint or aligned local plans will be for those plans to establish.



5723	Proposed Submission Core Strategy and Policies	DM10 - Protection of Trees and Hedgerows	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. In order to be sustainable Policy DM10 needs to reference the Hedgerow Regulations 1997 and the CS needs to state that "important hedgerows" will be protected from being removed (uprooted or destroyed).	The Hedgerow Regulations are already referenced in paragraph 9.83. The policy already refers to protecting hedgerows of amenity or biodiversity value, it is not clear what the term 'important' hedgerows would also include.
5742	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Mick Wright [254]	I welcome the fact that there will be a small country park built into the design of the Northern Fringe development.	Noted.
5747	Proposed Submission Core Strategy and Policies	DM31 - The Natural Environment	Mr Mick Wright [254]	The wildlife corridors as previously identified (just lines on a map) have been largely ignored. Wildlife corridors need resources to maintain, enhance and manage them over time. They need to have the right structure and be as wide as adjacent development will allow. In the past, once development starts, the existing wildlife corridor begins to deteriorate. They need a management plan.	Clearly given the nature of the urban area, the characteristics of Ipswich wildlife corridors will vary in terms of width, vegetation, disturbance, usage and ownership, etc. However, the ecological network is being supported by the Council's Parks Dept, particularly recognising the role that gardens play and supporting residents in trying to incorporate measures for wildlife into gardens. Thus while the corridors may not be perfect, they will help wildlife to move around the Borough. Management plans are under preparation for some areas e.g Orwell Country Park but IBC does not own all the wildlife corridor areas.
5749	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	D C Norman [1617]	Will this be achievable and make Ipswich a better place?	The retail proposals in CS14 take forward the recommendations of DTZ Report (ICD15) and are explained in the Town Centre and Retail Topic Paper (LPCD44).
5754	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Mr Brian Pinner [1616]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Fails to address traffic flow in the north of Ipswich	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5762	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Tudtenham St Martin Parish Council (Mrs C Frost) [1394]	The muddled presentation of the housing requirement in the opening of the document set the tone for the rest of the report. The scope sometimes includes the whole Ipswich Policy Area (IPA), e.g. available locations for all 13000+ homes, and sometimes does not, e.g. road access to the north of Ipswich. Housing requirements: of 13,550 for the period 2011-2031, 10,585 new sites are needed, 4,734 are identified within Ipswich Borough, including the IGS, with a further 1,800 properties to be built on 'windfall' sites. This leaves 4051 to be built within the IPA, but outside Ipswich Borough.	The Plan must refer to the Ipswich Policy Area and the wider Ipswich Housing Market Area in relation housing as the housing need for Ipswich cannot be met within the Borough. Whilst the remit of this Local Plan is for Ipswich Borough, the Plan must explain how the residual housing need will be dealt with.
5763	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Tudtenham St Martin Parish Council (Mrs C Frost) [1394]	The plan seems to be oblivious to risk: 1. consciously opting to develop flood plains, 2. dismissing the consequences of no clear strategy for East West traffic (particularly around the wet dock area), 3. dismissing the A14 and northern Ipswich traffic issues as out of its scope, 4. inward-looking focus regarding traffic infrastructure for Ipswich Garden Village, ignoring areas outside the Borough boundary. The Parish Council have deep concerns about the viability and sustainability of the plan, particularly the impact of fallings on Tudtenham St Martin residents and environment, and the presumption being made about areas in neighbouring authorities.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5764	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Tudtenham St Martin Parish Council (Mrs C Frost) [1394]	The plan seems to be oblivious to risk: dismissing the consequences of no clear strategy for East-West traffic (particularly around the wet dock area), dismissing the A14 and northern Ipswich traffic issues as out of its scope, having an inward-looking focus regarding traffic infrastructure for Ipswich Garden Village, ignoring areas outside the Borough boundary. The Key Transport Proposal is not sound. The proposal to work with neighbouring authorities and Suffolk County Council to investigate a northern bypass raises concerns as any northern bypass would result in Westerfield, and neighbouring villages, losing their individual identities, and becoming part of Ipswich.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5765	Proposed Submission Core Strategy and Policies	CS6: The Ipswich Policy Area	Tudtenham St Martin Parish Council (Mrs C Frost) [1394]	Policies written in general terms are selectively chosen, particularly for example with regard to relying on the scope of the Ipswich Policy Area. At times the scope of the plan covers the whole Ipswich Policy Area but at other times it does not. The Parish Council have concerns about the impact of the plan on Tudtenham St Martin, and the presumption being made in relation to areas in neighbouring authorities.	The Plan must refer to the Ipswich Policy Area and the wider Ipswich Housing Market Area in relation housing as the housing need for Ipswich cannot be met within the Borough. Whilst the remit of this Local Plan is for Ipswich Borough, the Plan must explain how the residual housing need will be dealt with.
5766	Proposed Submission Core Strategy and Policies	6.8 The Objectives	Tudtenham St Martin Parish Council (Mrs C Frost) [1394]	Objectives seem muddled, sometimes in conflict, sometimes not measured and sometimes only aspirations.	The objectives should be considered as a whole and are taken forward through the Local Plan policies.
5767	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Tudtenham St Martin Parish Council (Mrs C Frost) [1394]	Object to inward-looking focus regarding traffic infrastructure for Ipswich Garden Village, ignoring anything outside the Borough boundary. The Parish Council have severe reservations about the predicted peak hour traffic generation, which is based on surveyed traffic for similar housing areas. Suffolk Constabulary measured traffic through Tudtenham St Martin: 30,000 vehicles travelled through the village in one week, last November. This brings in to disrepute the traffic modelling work using old census data. This concern has been raised before with Ipswich Borough Council and Suffolk County Council but no reply has been received. Concerned about the plan's impacts on the village.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5769	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr Brian Pachent [1156]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Hospitals, schools and access to GPs and social care are currently inadequate, how will they cope with growth? Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area, policy CS17 will improve matters.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5770	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Mr Brian Pachent [1156]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Hospitals, schools and access to GPs and social care - these services will cope. Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area, CS20 will improve matters.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5771	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Brian Pachent [1156]	The plan will protect our health or deal with air pollution. National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will deliver sustainable development.	Noted.
5772	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Brian Pachent [1156]	The plan will deliver the park successfully and in a timely fashion. The Council has listened to local opinion.	Noted.
5773	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mr Brian Pachent [1156]	The jobs target of in the region of 12,500 jobs is questionably realistic. This is questionably sustainable and questionably compliant with the National Planning Policy Framework (NPPF).	Noted. The Employment Topic Paper (LPCD40) contains further explanation of the jobs target.
5774	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Brian Pachent [1156]	CS10 is sustainable development and the public are being listened to in regard of the garden suburb proposal.	Noted.
5775	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3.	Mr & Mrs David and Pamela McCartney [1701]	Where will 12,500 jobs come from? There is no need for 13,500 homes and this number is not desirable. Better infrastructure should be provided locally first. For example, prior to a northern fringe development new relief roads to the north and west are required and faster rail networks to London, Cambridge and Norwich should be provided.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5776	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr & Mrs David and Pamela McCartney [1701]	The plan will not protect our health or deal with air pollution. National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development. Local residents feel that there will be adverse effects and that their views are not being listened to.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5778	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Mr & Mrs David and Pamela McCartney [1701]	Object to the requirement for 13,500 homes - they are not needed and this number is not desirable. It requires a big increase on current building levels and those since 2008. Better infrastructure should be provided locally first. For example, prior to a northern fringe development new relief roads to the north and west are required and faster railway networks to London, Cambridge and Norwich should be provided.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5798	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Yvonne Maynard [1893]	Transport issues and traffic proposals - the plan is not justified or effective.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5799	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Yvonne Maynard [1893]	Transport issues and Traffic proposals, Hospitals, Schools and GP surgeries and Social Care Services will not be able to cope. Infrastructure, Drainage, flooding and sewerage issues, there is no need for 13,500 homes.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5800	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Yvonne Maynard [1893]	Transport issues and Traffic proposals - the plan is not justified or effective.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5801	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Yvonne Maynard [1893]	Air pollution, Infrastructure issues, the plans for the Country Park are not acceptable, sustainable development will not be achieved through CS1.	See Appendix 1 to this table - 'Ipswich Garden Suburb'

5802	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	Yvonne Maynard [1893]	Do not understand how 12500 jobs will be created	The Employment Topic Paper (LPCD40) contains further explanation of the jobs target.
5803	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Yvonne Maynard [1893]	The proposed retail and shopping centre plan is unachievable, do not understand how 12500 jobs will be created.	The retail proposals in CS14 take forward the recommendations of DTZ Report (ICD15) and are explained in the Town Centre and Retail Topic Paper (LPCD44). The Employment Topic Paper (LPCD40) contains further explanation of the jobs target.
5804	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Yvonne Maynard [1893]	The Country Park Plans are unacceptable	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5805	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	Mr Philip Maynard [1895]	Transport issues and traffic proposals - the plan is not justified or effective.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5806	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr Philip Maynard [1895]	Transport issues, Infrastructure issues with drainage, flooding sewerage, school places, hospital places, GPs and Social Care and there is no need for 13500 homes	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5807	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Philip Maynard [1895]	Air pollution, Infrastructure issues. The Country Park Plans are unacceptable, CS1 is does not achieve sustainable development.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5808	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Philip Maynard [1895]	The Country Park Plan is unacceptable	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5809	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	Mr Philip Maynard [1895]	Transport issues and traffic proposals - the plan is not justified or effective.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5810	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mr Philip Maynard [1895]	Do not understand how 12500 jobs will be created, the retail and shopping centre plan is unachievable	The retail proposals in CS14 take forward the recommendations of DTZ Report (ICD15) and are explained in the Town Centre and Retail Topic Paper (LPCD44). The Employment Topic Paper (LPCD40) contains further explanation of the jobs target.
5811	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	Mr Philip Maynard [1895]	Do not understand how 12500 jobs will be created.	The Employment Topic Paper (LPCD40) contains further explanation of the jobs target.
5816	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Creasey [1896]	Question whether the plan will protect our health or deal with air pollution.	Policies DM17 and DM18 set out requirements which would seek to reduce car dependency arising from new development.
5817	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Creasey [1896]	Question the effectiveness of the plan which allocates the whole of the Garden Suburb for approximately 3,500 new dwellings, plus 10,000 homes in other parts of Ipswich. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5821	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	Mrs Creasey [1897]	Question the requirement for 13,500 homes - they are not needed and this number is not desirable. It requires a big increase on current building levels and those since 2008.	This was considered at the Stage 1 hearings and is addressed in the Inspector's Interim Findings report dated 19th April 2016. See Appendix 1 to this table - 'Ipswich Garden Suburb'
5824	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mrs Creasey [1897]	Question the jobs target of in the region of 12,500 jobs is unrealistic and undeliverable as to date there has been no real job growth since 2001 and public sector jobs are set to reduce. This is unsustainable and not compliant with the National Planning Policy Framework (NPPF).	The Employment Topic Paper(LPCD40) explains the jobs target.
5830	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr John Summers [322]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5852	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Neil Summers [1887]	Where will 12,500 jobs come from? National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Employment Topic Paper(LPCD40) explains the jobs target. The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5863	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Miss Charlotte Miller [1888]	Where will 12,500 jobs come from? National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Employment Topic Paper(LPCD40) explains the jobs target. The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5872	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	Mr Roy Bush [664]	The vacant units in the town centre should be converted into town houses and flats	It is not clear which units are being referred to but the Local Plan identifies a number of sites in the town centre for residential or mixed use development. Others may come forward as part of the windfall allowance.
5874	Proposed Submission Core Strategy and Policies	Chapter 4: The Duty to Co-operate	Mr Roy Bush [664]	IBC needs to demonstrate that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council. IBC needs to explain in the CS how this strategic purchase aligns with employment and housing growth strategies and targets [to focus new employment within the town centre].	The sugar beet factory site is an existing allocation within the Babergh Core Strategy and does not therefore affect the allocations within Ipswich Borough.
5897	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	F A Leeder [1567]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5900	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	F A Leeder [1567]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5909	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	A W Parkin [1570]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5911	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr R Snook [507]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area, development will not improve matters.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5913	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr R Snook [507]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5920	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mrs A Snook [508]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area, development will not improve matters.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5935	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	D Roberts [1580]	Need new shops of good quality to lift Ipswich.	Attracting new shops of good quality relates to a wide range of factors: allocating the land, generating more spend through growing Ipswich, improving the public realm, improving parking and accessibility, etc. The plan addresses all these factors.
5938	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	River Action Group (Mr John Ireland) [1054]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Hospitals, schools and access to GPs and social care are currently inadequate, how will they cope with growth? Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area. It is not known whether the plan will improve matters.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
5944	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr & Mrs Robert and Rosemary Free [1587]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5954	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr & Mrs Robert and Rosemary Free [1587]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
5965	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Jill Page [1600]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
15117	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Dennis Hussey [436]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).

17029	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	Mr Keith Risby [1733]	The jobs and homes figures are not justified. Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside it. Measurement indicators are needed. The housing target is so poorly defined as to be ineffective. A specific, realistic and measurable housing growth target is required for Ipswich Borough, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.	The Employment Topic Paper(LPCD40) explains the jobs target. The objectively assessed housing need for Ipswich was considered through the stage 1 hearings held in March 2016. Please refer to the Inspector's Stage 1 Interim Findings.
23141	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mrs J Evans [468]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
23152	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Paul Robinson [1441]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
23182	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	Mr Richard Attenborough [1853]	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Hospitals, schools, access to GPs and social care services will cope. Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area, development will not improve matters.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
23185	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Richard Attenborough [1853]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development. The plan will protect our health and deal with air pollution.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36). See Appendix 1 to this table - 'Ipswich Garden Suburb'
23207	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Claire Thornloe [1908]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
23267	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	A Exworth-Cook [1602]	Where will 12,500 jobs come from?	The Employment Topic Paper(LPCD40) explains the jobs target.
23273	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	A Exworth-Cook [1602]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
23295	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	C Steward [1111]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
23306	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr I Evans [398]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPCD36).
23366	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Brian Morris [526]	It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time. IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, resident will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
23496	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Derek Ford [1525]	It's unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. The CS should be based on co-operating more closely with neighbouring LAs to deliver homes growth. It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time. IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, resident will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
23509	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Raymond Sidaway [1543]	It's unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. The CS should be based on co-operating more closely with neighbouring LAs to deliver homes growth. It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time. IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, resident will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	

23560	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Jane Tywindale-Biscoe [1794]	It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. Unsure whether the CS can guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time.' IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, resident will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
23570	Proposed Submission Core Strategy and Policies	4.4	Mrs Jane Tywindale-Biscoe [1794]	IBC has not demonstrated that it has effectively worked with neighbouring Authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill and consequently the CS should not be adopted. Unsure whether IBC has failed to cooperate with Babergh Council over its purchase of the old sugar beet factory.	This was considered at the Stage 1 hearings and is addressed in the Inspector's Interim Findings report dated 19th April 2016. See Appendix 1 to this table - 'Ipswich Garden Suburb'
23794	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Gareth Ward [1227]	It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time.' IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, residents will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
23821	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr K Bannister [1285]	It's unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. The CS should be based on co-operating more closely with neighbouring LAs to deliver homes growth. It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time.' IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, resident will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
23952	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3.	Mrs A Walker [1768]	Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed.	This Local Plan relates to Ipswich Borough and therefore setting a jobs target for areas outside the Borough would be beyond the remit of the plan.
24032	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mrs Pamela Plumby [525]	It's unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. The CS should be based on co-operating more closely with neighbouring LAs to deliver homes growth. It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
24069	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	River Action Group (Mr John Ireland) [1054]	The plans will protect our health and deal with pollution. The plan can achieve sustainable development. It is not known whether the removal of trees, hedgerows, habitats and farmland is acceptable and whether the Country Park will be delivered in a timely manner. It is not known whether the plan will improve matters relating to infrastructure and services drainage, flooding and sewage.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
24070	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	River Action Group (Mr John Ireland) [1054]	It is not known where the 12,500 jobs will come from or whether the retail and shopping policies are achievable and would make Ipswich a better place.	The Employment Topic Paper (LPCD40) and the Town Centre and Retail Topic Paper (LPCD44) and the explain the jobs target and the retail policies.
24071	Proposed Submission Core Strategy and Policies	CS4: Protecting our Assets	River Action Group (Mr John Ireland) [1054]	It is not known whether the removal of trees, hedgerows, habitats and farmland is acceptable or whether the plan will deliver the Country Park in a timely manner.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
24072	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	River Action Group (Mr John Ireland) [1054]	It is not known whether the removal of trees, hedgerows, habitats and farmland is acceptable and whether the plan will deliver the Country Park in a timely manner.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
24073	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	River Action Group (Mr John Ireland) [1054]	There is a need for 13,500 homes and this number is desirable.	Noted.

24123	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Peter Stephenson [1076]	It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. However the CS can deliver the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time.' IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, residents will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
24131	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mr Frank Seal [1482]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPDC36).
24132	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	Mrs Roberta Seal [1481]	National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	The Core Strategy Review has been subject to Sustainability Appraisal and the recommendations have been taken on board - see Annex to Proposed Submission Sustainability Appraisal Reports - Addressing Recommendations (LPDC36).
24195	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	Mr Nigel Wall [1613]	Object to Garden Suburbs on grounds of design, traffic congestion, air quality and drainage	See Appendix 1 to this table - 'Ipswich Garden Suburb'
24196	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	Mr Nigel Wall [1613]	Not enough jobs in central Ipswich to warrant all the new housing	The Housing and Employment Integration Statement (PSCD08) explains the relationship between jobs and housing.
24212	Proposed Submission Core Strategy and Policies	DM32 - Protection and Provision of Community Facilities	Planware Ltd (Donna Smith) [1223]	The requirement to demonstrate a facility is genuinely redundant is too vague. The 12 month marketing requirement is too long, 6 weeks would be more appropriate for a public house. No consideration has been given to the negative impact on the community, employment provision or sustainability through sites remaining redundant for 12 months. The policy is not consistent with the policy in the NPPF which states that planning should not act as an impediment to sustainable growth.	The requirement and marketing are standard approaches. 6 weeks is considered too short a timescale to ascertain whether there is or is not genuine interest in a property. Whilst redundant premises are not desirable, a greater community impact could result from the loss of a facility which is still needed, as they are difficult to replace.
24214	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	EDF Energy Plc (Miss Nicola Forster) [248]	There should be a preference for development on brownfield land. There should be some flexibility with density standards. In certain situations outside of the town centre it may be possible to achieve higher densities and each site should be assessed on a site specific basis.	Policy CS9 sets out a preference for development on previously developed land whilst acknowledging that greenfield development is also required to meet housing need. Policy DM30 contains flexibility in relation to densities where the site location, characteristics, constraints or sustainable design justify a different approach.
24215	Proposed Submission Core Strategy and Policies	CS9: Previously Developed Land	EDF Energy Plc (Miss Nicola Forster) [248]	Support this policy approach and agree with the priority of building on previously developed land.	This support is welcomed.
24216	Proposed Submission Core Strategy and Policies	CS12: Affordable Housing	EDF Energy Plc (Miss Nicola Forster) [248]	Pleased to see the affordable housing target has been lowered and that a lower amount may be acceptable subject to viability testing. However, the policy does not provide for off-site provision or commuted sums, it would be helpful to provide these alternative arrangements.	The approach supports the provision of mixed developments, consistent with paragraph 50 of the National Planning Policy Framework.
24217	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	EDF Energy Plc (Miss Nicola Forster) [248]	Financial contributions should be sought in areas where there is an identified deficiency and at a level which ensures that the overall delivery of appropriate development is not compromised. Government guidance states that planning obligations must be fair, reasonable and proportionate.	Development is expected to address its own needs for infrastructure as identified through Policy CS17.
24218	Proposed Submission Core Strategy and Policies	DM25 - Protection of Employment Land	EDF Energy Plc (Miss Nicola Forster) [248]	Support the amendment to this policy which now contains clearer guidance around the grounds upon which the Council will accept evidence that there is no reasonable prospect of the site being used for employment purposes. The approach accords with paragraphs 51 and 52 of the NPPF.	This support is welcomed.
Proforma	Proposed Submission Core Strategy and Policies	2.1	241	The Localism Act - local people are not being listened to.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	4.4	777	IBC has not demonstrated that it has effectively worked with neighbouring Authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill and consequently the CS should not be adopted. IBC needs to demonstrate that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council. IBC needs to explain in the CS how this strategic purchase aligns with employment and housing growth strategies and targets [to focus new employment within the town centre].	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	4.4	44	IBC has not demonstrated that it has effectively worked with neighbouring Authorities on cross boundary issues affecting jobs, housing and infrastructure since there are no published results nor results incorporated into the CS. This does not accord with the 2011 Localism Bill and consequently the CS should not be adopted.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	4.4	22	IBC needs to demonstrate that the strategic purchase of the old sugar beet factory was with the prior agreement of Babergh Council. IBC needs to explain in the CS how this strategic purchase aligns with employment and housing growth strategies and targets [to focus new employment within the town centre].	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	684	Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed. The housing target is so poorly defined as to be ineffective. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	87	The jobs and homes figures are not justified. Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside it. Measurement indicators are needed. The housing target is so poorly defined as to be ineffective. A specific, realistic and measurable housing growth target is required for Ipswich Borough, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	187	Where will 12,500 jobs come from? There is no need for 13,500 homes and this number is not desirable.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	19	Where will 12,500 jobs come from?	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	6	There is no need for 13,500 homes and this number is not desirable.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	4	The housing target is so poorly defined as to be ineffective. To improve soundness a specific, realistic and measurable housing growth target is required for the Borough of Ipswich, based on the best available data and forecasts. IBC plans to help grow housing in neighbouring LAs. This needs to be explained and agreed with neighbouring LAs, together with a plan of how it will be achieved and measured.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	28	Without properly defined specific and measurable jobs growth objectives the CS is unsound. Two jobs targets are required: one for the Borough and one for outside the Borough. Measurement indicators are needed.	See Appendix 1 to this table - 'Ipswich Garden Suburb'

Proforma	Proposed Submission Core Strategy and Policies	6.8 The Objectives, 3:	1	There is no need for 13,500 homes and this number is not desirable (Objective 3a). Where will 12,500 jobs come from (Objective 3b)?	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	271	The plan will not protect our health or deal with air pollution. National Planning Policy Framework (NPPF) says sustainable developments means no adverse impacts should be caused elsewhere. The Core Strategy Review will not deliver sustainable development.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS1: Sustainable Development - Climate Change	15	The plan will not protect our health or deal with air pollution.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS2: The Location and Nature of Development	783	For improved effectiveness and soundness it is recommended a target be reinstated for the use of brownfield land with priority given to regenerating these sites in preference to developing the Northern Fringe greenfield site.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS5: Improving Accessibility	303	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	722	The Council's population forecast should not be based on a high immigration scenario, which is inconsistent with the policies of all the main political parties.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	83	The Council's population forecast should not be based on a high immigration scenario, which is inconsistent with the policies of all the main political parties. Object to the requirement for 13,500 homes - they are not needed and this number is not desirable. It requires a big increase on current building levels and those since 2008.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS7: The Amount of Housing Required	212	Object to the requirement for 13,500 homes - are they needed and is this number desirable? It requires a big increase on current building levels and those since 2008.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	80	It's unsound to allocate the entire Northern Fringe when its delivery may not be viable over plan timescales. How will infrastructure be provided? The CS should be based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not harm a European designated habitat. Allowing multi-site starts will result in severe congestion and damage the attractiveness and prosperity of Ipswich. With few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	213	The plan allocates the whole of the Garden Suburb for approximately 3,500 new dwellings, plus 10,000 homes in other parts of Ipswich. How will infrastructure be provided? Country Park delivery unlikely until at least 2025 with multi start development before 2021 and immediate removal of trees, hedgerows, habitats, farm land. This is not acceptable. The plan will not deliver the park successfully and in a timely fashion. The Council has not listened to local opinion.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	723	It is unsound to allocate the entire Northern Fringe when its delivery may not be viable over the plan timescales. To lower this risk the CS should include a plan based on co-operating more closely with neighbouring LAs to deliver homes growth. The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not adversely affect the integrity of a European designated habitat. For soundness, policy CS10 and Infrastructure Table 8B need to be revised. Allocating the entire Northern Fringe for immediate development through multi-site starts is a high risk strategy that will result in severe traffic congestion for both North Ipswich and the town centre and will damage the future attractiveness and prosperity of town. With so few new jobs being created in the town centre, residents will have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements. In response to a planning application by Mersea Homes /CBRE Global Investors for the first phase of the Ipswich Garden Suburb, Suffolk County Council stated with regard to traffic '... the development has a severe impact on network performance and travel time'. IBC has been pinning their hopes on getting people out of their cars and onto public transport but with so few new jobs being created in the town centre, residents will mainly have to commute by car to jobs growth sites. The effectiveness of the Core Strategy to deliver the Ipswich Garden Suburb is doubtful without additional road improvements and capacity such as a northern bypass or link road. New measures will also be required to ensure air quality does not deteriorate.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS10: Ipswich Garden Suburb	27	The CS cannot guarantee delivery of the Country Park in a timely manner and so demonstrate it will not harm the integrity of a European designated habitat. CS10 and table 8B need to be revised.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	707	A recent report by Peter Brett Associates (listed on the IBC website) calls into question the viability of developing new offices, industrial units, warehousing and large retail offerings with Ipswich. This challenges the ability of the CS to deliver the massive jobs growth target. For soundness the CS needs to address the severe obstacle to growth identified and produce a specific and realistic jobs target for the Borough of Ipswich.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	83	A report by Peter Brett Associates calls into question the viability of developing new offices, industrial units, warehousing and large retail offerings with Ipswich. This challenges the ability of the CS to deliver the massive jobs growth target. For soundness the CS needs to address the severe obstacle to growth identified and produce a specific and realistic jobs target for the Borough of Ipswich. The jobs target of in the region of 12,500 jobs is unrealistic and undeliverable. This is unsustainable and not compliant with the National Planning Policy Framework (NPPF).	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS13: Planning for Jobs Growth	205	The jobs target of in the region of 12,500 jobs is unrealistic and undeliverable as to date there has been no real job growth since 2001 and public sector jobs are set to reduce. This is unsustainable and not compliant with the National Planning Policy Framework (NPPF).	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS14: Retail Development and Main Town Centre Uses	282	This will not be achievable and will not make Ipswich a better place.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	731	Traffic congestion is a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. The plan will not be effective and is unsound. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation can be implemented. Fresh/waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified. There is a lack of sewage pipeline capacity between the Garden Suburb and Cliff Quay treatment works.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	218	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Hospitals, schools and access to GPs and social care are currently inadequate, how will they cope with growth? Infrastructure and services drainage, flooding, sewage proposals - there are already problems in this area, will development improve matters?	See Appendix 1 to this table - 'Ipswich Garden Suburb'

Proforma	Proposed Submission Core Strategy and Policies	CS17: Delivering Infrastructure	83	Traffic congestion is a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Hospitals, schools and access to GPs and social care are currently inadequate, how will they and other infrastructure and services e.g. drainage cope with growth? Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation can be implemented. Fresh/waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	731	Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. As such the plan will not be effective and is unsound. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation methods can be implemented. Freshwater and waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	1	Traffic congestion has always been a key concern. Plan fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Updated traffic and air quality modelling should be undertaken and development not permitted unless effective mitigation methods can be implemented. Freshwater and waste water infrastructure needs to be objectively assessed and key infrastructure listed. Risks to delivery should be identified. Following the introduction of the computer based traffic light control system, traffic is worse than ever. Difficulties are experienced in Valley Road and Henley Road and the pedestrian crossing is dangerous.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	220	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	1	Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, the lack of access between the Northern Fringe area and major trunk routes (A14 in particular) without having to travel via/near Ipswich town centre, further adding to congestion - the Core Strategy only indicates that a northern bypass or link road investigation be "encouraged" by key partners.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
Proforma	Proposed Submission Core Strategy and Policies	CS20: Key Transport Proposals	83	Expect further gridlock and adverse impacts on existing residents and the local economy, which the plan will not remedy. Traffic congestion has always been a key concern for residents. The CS fails to properly assess development and infrastructure requirements including the cumulative effects on traffic, air pollution, fresh water and wastewater. Updated traffic and air quality modelling should be undertaken and development not be permitted unless effective mitigation methods can be implemented. Freshwater and waste water infrastructure needs to be objectively assessed and key infrastructure listed in the CS. The risks to delivery should be identified.	See Appendix 1 to this table - 'Ipswich Garden Suburb'
<b>SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT PROPOSED SUBMISSION STAGE (REGULATION 19)</b>					
5113	Proposed Submission Site Allocations and Policies	IP010a - Co Op Depot, Felixstowe Road	Eric Walker [1061]	This plan seems to contain our premises 22 and 22a Hines Rd. No one has contacted us about this proposal which seems a bit remiss! Concord Video & Film Council.	The Plan is a long term plan to 2031, however it is noted that this part of the site may not be available in the short term.
5115	Proposed Submission Site Allocations and Policies	IP150b (UC267 part) - Land south of Ravenswood	Ravenswood Residents Association (Mr Richard Venning) [1065]	Road access and egress to and from Ravenswood is a growing problem. We will want to be satisfied that this development has new and adequate road access and that the opportunity is taken to relieve pressure on the single access point that currently exists. As the Residents Association we wish to participate in early consultation and to be kept informed of progress of the site development proposal in general and any specific plans in particular.	The Council is aware of traffic issues in the vicinity of Nacton Road and Ravenswood. The site sheets for this site and adjacent ones refer to the need for a master planned approach to improving access at this key gateway to the town.
5116	Proposed Submission Site Allocations and Policies	IP150c (UC267) - Land South of Ravenswood	Ravenswood Residents Association (Mr Richard Venning) [1065]	Road access and egress to and from Ravenswood is a growing problem. We will want to be satisfied that this development has new and adequate road access and that the opportunity is taken to relieve pressure on the single access point that currently exists. As the Residents Association we wish to participate in early consultation and to be kept informed of progress of the site development proposal in general and any specific plans in particular.	The Council is aware of traffic issues in the vicinity of Nacton Road and Ravenswood. The site sheets for this site and adjacent ones refer to the need for a master planned approach to improving access at this key gateway to the town.
5117	Proposed Submission Site Allocations and Policies	IP152 - Airport Farm Kennels, North of the A14	Ravenswood Residents Association (Mr Richard Venning) [1065]	Road access and egress to and from Ravenswood is a growing problem. We will want to be satisfied that this development has new and adequate road access and that the opportunity is taken to relieve pressure on the single access point that currently exists. As the Residents Association we wish to participate in early consultation and to be kept informed of progress of the site development proposal in general and any specific plans in particular.	The Council is aware of traffic issues in the vicinity of Nacton Road and Ravenswood. The site sheets for this site and adjacent ones refer to the need for a master planned approach to improving access at this key gateway to the town.
5122	Proposed Submission Site Allocations and Policies	IP006 - Co Op Warehouse, Pauls Road	Co-op Juniors Theatre Productions Ltd (Mr Paul Lofis) [1080]	The current use as listed below does not include the use made of the warehouse by the Co-op Juniors Theatre Productions Ltd which has occupied part of the warehouse for over 25yrs. The Co-op Juniors is a charitable co-operative for the benefit of the community providing young people with training in dance, singing and stage craft. With a co-operative ethos the 'Juniors' provides young people with low cost training to a very high standard of performance. This amateur group is probably the largest in East Anglia.	An amendment to the site sheet was put forward through the Pre-Submission Additional Modifications to refer to the Co-op Juniors occupying part of the site.
5123	Proposed Submission Site Allocations and Policies	IP054 - Land between Old Cattle Market and Star Lane	Mr Norman Agran [1083]	We believe the Local Plan is of sound judgement and agree with what has been proposed.	This support is welcomed.
5126	Proposed Submission Site Allocations and Policies	IP133 - South of Felaw Street	Dr William Millar [1161]	Given the number of identified brown field sites in the consultation document, the development of 33 houses on this site is an unnecessary conversion of a green space into a built environment. This is the only area of green land available to children in the area and is used by adults and children for recreational purposes. There is a high density of housing around the space, with a young population and no other available recreational area nearby, within walking distance available to children. The council should reconsider the allocation of any building on this land.	Through the Pre-Submission Additional Modifications the Council has specified that open space must be provided on-site. The site is also close to the Island Site (IP037) which will incorporate new areas of public open space.
5127	Proposed Submission Site Allocations and Policies	IP133 - South of Felaw Street	Mr Oliver Ingham King [1162]	Given the number of identified brown field sites in the consultation document, the development of 33 houses on this site is an unnecessary conversion of a green space into a built environment. This is the only area of green land available to children in the area and is used by adults and children for recreational purposes. There is a high density of housing around the space, with a young population and no other available recreational area nearby, within walking distance available to children. The council should reconsider the allocation of any building on this land.	Through the Pre-Submission Additional Modifications the Council has specified that open space must be provided on-site. The site is also close to the Island Site (IP037) which will incorporate new areas of public open space.
5135	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	Mr John Ames [1356]	I object to the inclusion of site ref IP256 for the following reasons: - site has drainage problems - access to Henley Road is inadequate - density is completely out of keeping with the surrounding area	The drainage constraint is flagged up through the site sheet in Appendix 3 and adopted policy DM4 of the Core Strategy requires flood risk to be considered. The site density and capacity were reduced in the submission stage allocation, to better fit in with the character of the area. The Highway Authority has not identified an issue with the access.
5136	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	Mr Alexander McDonald [1355]	I object to this proposal the site area of the hockey pitch is not 0.87 but in fact 0.80 as the former figure includes the access road to the club, the hockey pitch has been well used since 1952 and with the development of 3500 homes on the Northern fringes the retention of this sporting facility is important for health of residents and feel confident will thrive and prosper. Once this land is lost there will be nowhere for the club to grow, if allocated the maximum density should be 12 units in keeping with surrounding area.	The site is needed, in order to meet objectively assessed housing need. The reference in Policy SP2 specifies that the site area excludes the access road. The site density and capacity were reduced in the submission stage allocation, to better fit in with the character of the area.
5167	Proposed Submission Site Allocations and Policies	4.1	Ipswich Wildlife Group (Mr Steve Pritchard) [1164]	Missing from the whole of part B - the relationship of these sites to the Ecological Network does not seem to have been considered.	Policy DM31 contains policy relating to the ecological network which would apply to all development.
5184	Proposed Submission Site Allocations and Policies	IP015 - West End Road Surface Car Park	Parliament (Mr Ben Gummer) [1404]	A greater proportion of this land should be allocated for housing.	Paragraph 4.8 clearly states that the land use proportions indicated in policy SP2 represent the Council's preferred outcome but that the figures are indicative. The Council also needs to consider the need for alternative land uses such as long stay parking at the edge of the town centre, to support the town centre economy.

5185	Proposed Submission Site Allocations and Policies	IP037 - Island Site	Parliament (Mr Ben Gummer) [1404]	The emerging consensus from NALEP, SCC, UCS and the owner of the port is for employment use. IBC has been involved in these discussions.	Employment use is supported on part of the site (see policy SP5). However, the Council needs to weigh the need for both housing and employment uses across the Borough. The Island is a unique site in an attractive town centre location. It is the Council's view that it could be a great place for sustainable, town centre living and that an element of residential use could be compatible with the existing marine-related businesses. In addition, some residential use may help with delivery as it is a higher value use than employment uses. ABP have broadly supported the indicative mix of uses.
5186	Proposed Submission Site Allocations and Policies	IP040 and IP041 - Civic Centre Area / Civic Drive	Parliament (Mr Ben Gummer) [1404]	The primary allocation for this site should be residential - especially for sheltered and very sheltered accommodation. This reflects the aspirations for the town centre from Ipswich Central and SCC.	The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street. However, the allocation incorporates an element of residential use.
5187	Proposed Submission Site Allocations and Policies	IP055 - Crown Car Park, Charles Street	Parliament (Mr Ben Gummer) [1404]	IBC should retain the option of an allocation for housing or mixed development, should they be able to relocate the car park to south of Crown Street.	There is no immediate prospect of the car park being relocated to the south of Crown Street and therefore the Crown Street car park proposal is considered to best meet the need for high quality short stay shopper parking.
5188	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Parliament (Mr Ben Gummer) [1404]	This site might be needed as one of the options for a northern route.	It is possible that a future northern bypass or smaller link road may need to join the trunk road network at the Whitehouse Interchange. However, the Local Plan is about delivering appropriate development and within Ipswich Borough, site opportunities are limited because the Borough is under bounded. The Council should not blight the land by safeguarding it for a road scheme which may or may not happen, until plans for its funding and delivery are better advanced, including the formal identification of possible routes.
5190	Proposed Submission Site Allocations and Policies	SP3 Land with planning permission or awaiting a Section 106	ALDI stores Ltd (Mr Peter Griffiths) [1060]	We continue our support for the allocation of a District Centre at Sroughton Road.  We have concern in respect of the prescriptive nature of Uses being identified for site IP090, including that uses on the site should be in line with site's historic planning permissions.  We request the Council acknowledges the NPPF (p.173) which states when pursuing sustainable development careful attention is made to ensure viability and deliverability of schemes.  It's not suggested that residential is not possible, but rather the scale of residential must be commercially realistic and not impede upon delivery of the commercial element of the Centre.	Policy SP3 refers to sites being reserved for residential use or residential-led mixed use development. Policy DM21 in the Core Strategy supported by the policies map identifies the aim to deliver a district centre at Sroughton Road/Europa Way. The dual reference to the site could be confusing and therefore clarification should be added to the reference IP090 in policy SP3 thus: Europa Way (housing to be delivered as part of a mixed use district centre). The policy does not specify the scale of housing to be delivered.
5206	Proposed Submission Site Allocations and Policies	IP040 and IP041 - Civic Centre Area / Civic Drive	The Theatres Trust (Planning Adviser) [278]	Support but require changes. The adjacent theatre should be noted as a constraint to ensure that noise, vibration and access issues are considered in the design.	The Core Strategy amenity policy DM26 would cover this scenario but through the Pre-Submission Additional Modifications the constraint has been added to the site sheet.
5211	Proposed Submission Site Allocations and Policies	SP14 Arts, Culture and Tourism	The Theatres Trust (Planning Adviser) [278]	Support but require changes. The Theatres Trust supports this Policy as it reflects guidance at item 70 of the NPPF which states that planning policy should protect existing cultural facilities.  However, it is a concern that it only covers facilities in the main town centre area. This type of policy is normally included as a core strategy or a general development policy.	The Council wishes to focus new arts, culture and tourism facilities into the town centre and Waterfront as these are highly accessible locations and such uses would contribute to their vitality and viability. In terms of existing facilities, the majority are within the IP-One area (e.g. Wolsey Theatre, The Regent, the Corn Exchange and Film Theatre, Cineworld and Ipswich Museum), therefore the policy sits well in the IP-One area chapter of the Local Plan.
5217	Proposed Submission Site Allocations and Policies	3.2	Historic England (Mr Tom Gilbert-Woodbridge) [243]	Our response to the Core Strategy Review seeks improvements to the vision which would carry forward into this plan. We welcome the reference to Objective 8 under paragraph 3.2, as there is a geographical element to the protection and enhancement of the environment (including heritage assets) that needs to be addressed by this plan.	This support is welcomed.
5218	Proposed Submission Site Allocations and Policies	4.1	Historic England (Mr Tom Gilbert-Woodbridge) [243]	There is sometimes a lack of detail and/or clarity in terms of development constraints and issues in the site sheets contained in Appendix 3. In particular, scheduled monument and archaeological issues are not always properly addressed (see individual sites) in terms of what is required and the implications for potential development schemes.  The status of the site sheets in Appendix 3 is not entirely clear. We consider that the individual allocation policies should refer to the need to observe the site sheets in Appendix 3.	The site sheets are provided for information and do not form part of policy. Additional detail for site sheets has been proposed through the Pre-Submission Additional Modifications and The Council is producing a Statement of Common Ground with Historic England which it anticipates will be signed shortly.
5219	Proposed Submission Site Allocations and Policies	IP005 - Former Toaks Bakery, Old Norwich Road	Historic England (Mr Tom Gilbert-Woodbridge) [243]	This site forms part of the approach to/from Whitton Conservation Area and is likely to form part of its setting. Development of 100 homes could have a notable impact on the conservation area, particularly if Site IP032 was also developed for a similar number of homes along with Site 1406 for employment. We welcome the publication of a development brief for this and the adjoining site (although we have not had sight of the brief) and the requirement in the site sheet for development to have regard to the conservation area.	This support is welcomed.
5220	Proposed Submission Site Allocations and Policies	IP11b - Smart Street, Foundation Street	Historic England (Mr Tom Gilbert-Woodbridge) [243]	This is a very sensitive site. In particular, the site contains three scheduled monuments, with considerable archaeological potential across the site. The site also adjoins the Central and Wet Dock Conservation Area, along with the Grade II Church of St. Mary at the Quay.  Although the revised site sheet now refers to the above heritage assets, the wording is not effective with regards to archaeological considerations. The revised site sheet should also be strengthened with regards to its wording on the conservation areas and listed church, and better linked to national policy wording.	The Council is producing a Statement of Common Ground with Historic England which it anticipates will be signed shortly. The implications for development are contained within the Local Plan policies - the site sheets are provided for information.
5222	Proposed Submission Site Allocations and Policies	IP012 - Peter's Ice Cream	Historic England (Mr Tom Gilbert-Woodbridge) [243]	The development constraints mentions the area of archaeological importance and the adjoining Central Conservation Area and Grade II Church of St Clement to the south. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area and listed church. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. Through the Pre-Submission Additional Modifications the Council amended the first line of text in the site sheet in order that it refers to all heritage assets. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5224	Proposed Submission Site Allocations and Policies	IP031 - Burrell Road	Historic England (Mr Tom Gilbert-Woodbridge) [243]	The development constraints mention the area of archaeological importance, the adjoining Stoke Conservation Area (a conservation area on the Heritage at Risk Register), and the Grade I Church of St Mary at Stoke to the south. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area and listed church. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5225	Proposed Submission Site Allocations and Policies	IP032 - King George V Field, Old Norwich Road	Historic England (Mr Tom Gilbert-Woodbridge) [243]	As with Site IP005, this site falls within the setting of Whitton Conservation Area and could affect its significance, with the risk of cumulative impact. We welcome the publication of a development brief for this and the adjoining site (although we have not had sight of the brief) and the requirement in the site sheet for development to have regard to the conservation area.	This support is welcomed.
5228	Proposed Submission Site Allocations and Policies	IP035 - Key Street / Star Lane / Burtons Site	Historic England (Mr Tom Gilbert-Woodbridge) [243]	This is a very sensitive site. It contains a Grade II building on College Street, adjoins the listed and scheduled Wolsey Gate and is located between two conservation areas and two Grade II churches. In terms of archaeology, there are two scheduled monuments to the north while the site itself was the location of a priory & college.  The wording of the site sheet is not effective with regards to archaeological considerations. The sheet should also be strengthened with regards to its wording on the conservation areas and listed buildings, and better linked to national policy wording.	A number of amendments were proposed to the site sheet through the Pre-Submission Additional Modifications. The Council is producing a Statement of Common Ground with Historic England and it is anticipated that this will be signed shortly.
5229	Proposed Submission Site Allocations and Policies	IP037 - Island Site	Historic England (Mr Tom Gilbert-Woodbridge) [243]	The Island Site forms a large part of the Wet Dock Conservation Area and contributes to the significance of this heritage asset. We welcome the wording in the development constraints regarding the retention and refurbishment of historic structures and the reference to archaeology including industrial heritage. The wording also helpfully refers to the principles contained within Opportunity Area A (which we broadly support).	Noted
5231	Proposed Submission Site Allocations and Policies	IP039a - Land between Gower Street & Gt Whip Street	Historic England (Mr Tom Gilbert-Woodbridge) [243]	The development constraints refer to archaeology and the adjoining listed building and conservation area and refer to the development principles contained within Opportunity Area A. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area and listed church. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.



5233	Proposed Submission Site Allocations and Policies	IP040 and IP041 - Civic Centre Area / Civic Drive	Historic England (Mr Tom Gilbert-Woodridge) [243]	The development constraints mention archaeology (if not the area of archaeological importance with covers over half of the site), and the nearby conservation areas and the Grade II* Church of St Matthew to the west. Reference is also made to the development principles contained within Opportunity Area E. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation areas and listed church. The lack of clarity could affect proposals for this site.	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5234	Proposed Submission Site Allocations and Policies	SP2 Land Allocated for housing	Associated British Ports [209]	ABP supports the allocation of Site IP037 - Island Site for housing as part of a mixed use development. Given the nascent proposals for the site, the national housing capacity set out in the policy can only be indicative at this stage, although it is below ABP's expectations. ABP welcomes the recognition in the Policy that the precise split should be a matter for a future master plan and/or planning application having regard to viability (consistent with para 2.11).	This support is welcomed.
5235	Proposed Submission Site Allocations and Policies	SP6 Land allocated for employment use	Associated British Ports [209]	ABP supports the allocation of Site IP037 - Island Site for employment as part of a mixed use development. Given the nascent proposals for the site, the national area/split set out in the policy can only be indicative at this stage. ABP welcomes the recognition in the Policy that the precise split should be a matter for a future master plan.	This support is welcomed.
5236	Proposed Submission Site Allocations and Policies	SP6 Land allocated and protected as open space	Associated British Ports [209]	ABP supports the overall site allocation (IP037) but requests amendment to the wording of the policy to allow for a lesser amount of open space in the proportional split of acceptable uses where a master plan or the preparation of more detailed proposals show this is appropriate and expedient.	The Waterfront area has a deficit of public open space. The development density proposed is at the bottom end of the 'high' range set out in policy DM30 at 90 dwellings per hectare and therefore 15% open space provision is needed to accord with policy DM29. Other aspects of the use mix allow flexibility to support viability but open space is necessary to create a suitable residential environment.
5237	Proposed Submission Site Allocations and Policies	IP043 - Commercial Buildings and Jewish Burial Ground, Star Lane	Historic England (Mr Tom Gilbert-Woodridge) [243]	This is a very sensitive site partly within the Central Conservation Area and containing Grade II listed buildings while adjoining other listed buildings. The archaeological issues include the Jewish Burial Ground.  Although the revised site sheet now refers to many of the above heritage assets, the wording is not effective with regards to archaeological consideration. The revised site sheet should also be strengthened with regards to its wording on the conservation area and listed buildings, and better linked to national policy wording. Clarity is also needed regarding the burial ground.	The Council proposed a number of amendments to the site sheet through the Pre-Submission Additional Modifications. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5238	Proposed Submission Site Allocations and Policies	SP9 Safeguarding land for transport infrastructure	Associated British Ports [209]	ABP is content with the wording in Policy SP9 as it relates to Site IP037 that the development layout should not prejudice future provision of a Wet Dock Crossing, provided that this does not ignore that the critical challenge to realising successful redevelopment of the Island Site will be viability (which is recognised at paragraph 2.11 as one of the more detailed issues emerging from the evidence which this plan needs to address).	This support is welcomed.
5239	Proposed Submission Site Allocations and Policies	SP11 The Waterfront	Associated British Ports [209]	ABP welcomes the recognition given at paragraph 5.20 (in support of Policy SP11) to the need for new development to take account of the Port's operational needs given its situation within and adjacent to the Waterfront.	This support is welcomed.
5240	Proposed Submission Site Allocations and Policies	IP048 - Mint Quarter / Cox Lane	Historic England (Mr Tom Gilbert-Woodridge) [243]	This is a very sensitive site, where approximately half of the site is designated as a scheduled monument and there is considerable archaeological potential across the whole site. The site also adjoins the conservation area and listed buildings.  Although the revised site sheet now refers to the above heritage assets, the wording is not effective with regards to archaeological considerations, particularly with regards to the scheduled monument. The revised site sheet should also be strengthened with regards to its wording on the conservation areas and listed church, and better linked to national policy wording.	The Council proposed a number of amendments to the site sheet through the Pre-Submission Additional Modifications. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5241	Proposed Submission Site Allocations and Policies	SP16 Transport Proposals in IP-One	Associated British Ports [209]	ABP welcomes the approach taken in the wording of Policy SP16 and paragraph 5.46.  ABP recognises the desire for a new crossing and will assist the Council in seeking to develop a feasible solution which addresses all safety, security and operational issues and avoids any adverse impact on port operations.	Some of the points raised are already addressed through the policy for example boat access into the Wet Dock and along New Cut West. The Council proposed adding additional text to paragraph 5.46 through the Pre-Submission Additional Modifications.
5242	Proposed Submission Site Allocations and Policies	IP052 - Land between Lower Orwell Street & Star Lane	Historic England (Mr Tom Gilbert-Woodridge) [243]	The development constraints mention the area of archaeological importance, the adjoining Central Conservation Area and nearby scheduled monuments, but only refers to the Grade II* listed building to the north when there is also a Grade II building (26-28 Fore Street). While the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation areas and listed buildings. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	Through the Pre-Submission Additional Modifications the Council has added reference to the Grade II listed buildings.
5243	Proposed Submission Site Allocations and Policies	Opportunity Area A - Island Site	Associated British Ports [209]	ABP supports the identification of the Island Site as an opportunity area, and generally supports the points set out under 'Development Opportunities' and 'Development Principles'. However, ABP requests the removal of reference to "lower rise development" in the supporting text and to "generally low to medium rise development (3, 4 and 5 storeys)" to allow more flexibility in the development of a viable scheme capable of addressing the particular development costs on this site. ABP also requests the removal of "(max 50%)" against the residential reference, allowing a more flexible proportion of acceptable uses.	The development principles specify low to medium rise development up to 5 storeys. The percentage mix is indicative as explained in paragraph 4.8 but the Council proposed to clarify this through its Pre-Submission Additional Modifications.
5244	Proposed Submission Site Allocations and Policies	IP054 - Land between Old Cattle Market and Star Lane	Historic England (Mr Tom Gilbert-Woodridge) [243]	This is a very sensitive site partly within the conservation area and containing two Grade II buildings and two scheduled monuments with considerable archaeological potential across the site. The site is flanked by the conservation area and several listed buildings, with two Grade II* churches to the south.  Although the revised site sheet now refers to some of the above heritage assets, the wording is not effective with regards to archaeological considerations. The revised site sheet should also be strengthened with regards to its wording on the conservation areas and listed buildings, and better linked to national policy wording.	A number of amendments were proposed to the site sheet through the Pre-Submission Additional Modifications. The Council is producing a Statement of Common Ground with Historic England and it is anticipated that this will be signed shortly.
5245	Proposed Submission Site Allocations and Policies	IP089 - Waterworks Street	Historic England (Mr Tom Gilbert-Woodridge) [243]	The development constraints mention the area of archaeological importance, the part location within the (Central) conservation area and adjacent listed building (although there is more than one listed building in the vicinity). However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area and listed buildings. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5246	Proposed Submission Site Allocations and Policies	IP096 - Car Park Handford Road East	Historic England (Mr Tom Gilbert-Woodridge) [243]	The development constraints mention archaeology and the adjoining (Burlington Road) conservation area. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5247	Proposed Submission Site Allocations and Policies	4.9	Environment Agency (Lizzie Griffiths) [1021]	We support this policy and are pleased to note some of our previous comments have been taken onboard, with reference made to the requirement for site-specific Flood Risk Assessments to be submitted in support of new development in Flood Zones 2 and 3.  We have had sight of the Council's Flood Risk Sequential Test and Exception Test Statement, but this document is not referenced within the DPD. We strongly recommend this policy is amended, showing how you have had regard to the Sequential Test in the allocation of sites and include the requirement to apply the Exception test, as appropriate.	The Council has proposed the following text through its Pre-Submission Additional Modifications: '4.9 In allocating sites for development the Council has followed the sequential approach, to ensure that sites are not allocated in areas with a greater probability of flooding if sites in lower risk areas are available. It has also applied the exception test to ensure that, where sites in flood zones 2 and 3 have been allocated, the benefits to the community of development outweigh flood risk, and ensure that development will be safe...The Council's supplementary planning document on Development and Flood Risk provides more guidance.'
5248	Proposed Submission Site Allocations and Policies	IP133 - South of Felaw Street	Historic England (Mr Tom Gilbert-Woodridge) [243]	We note this site is now proposed for allocation following the lapse of planning permission. The site adjoins the Wet Dock Conservation Area and the Grade II listed building of 42-48 Felaw Street, and is within the area of archaeological importance. While the development constraints refer to the area of archaeological importance, there is no reference to the conservation area or listed building, or what the implications are for development. The lack of clarity could affect proposals for this site, notwithstanding the reference to the development principles set out in Opportunity Area A.	The Council proposed the addition of the following text to the site sheet through its Pre-Submission Additional Modifications: 'The site is adjacent to the Wet Dock conservation area and to the Grade II listed Felaw Maltings. The site lies close to Anglo-Saxon remains (IPS 683, IPS 230). No objection in principle to development but it will require a condition relating to archaeological investigation attached to any planning consent.'
5249	Proposed Submission Site Allocations and Policies	IP136 - Silo, College Street	Historic England (Mr Tom Gilbert-Woodridge) [243]	IP136: College Street This is a sensitive site within the Central and West Dock Conservation Areas and opposite the Grade I listed and scheduled Wolsey Gate, plus sits within the area of archaeological importance. The development constraints mention these heritage assets, but apart from archaeology, there is no explanation of the implications for specific proposals with regards to the conservation area and listed/scheduled gate. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	Some amendments to the site sheet were proposed through the Pre-Submission Additional Modifications. The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.

5250	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Historic England (Mr Tom Gilbert-Woodridge) [243]	As with Sites IP005 and IP032, this site falls within the setting of Whitton Conservation Area and could affect its significance, with the risk of cumulative impact. The conservation area is not mentioned in the development constraints (although archaeology is). The lack of clarity could affect proposals for this site, and is not consistent with the wording used in the site sheets for IP005 and IP032.	The Council proposed adding the following text to the site sheet through its Pre-Submission Additional Modifications: 'The site is adjacent to the Whitton conservation area and any development should have regard to the setting of the conservation area and conserve its significance'
5251	Proposed Submission Site Allocations and Policies	IP172 - 15-19 St Margaret's Green	Historic England (Mr Tom Gilbert-Woodridge) [243]	The development constraints mention the site's location within the Central Conservation Area and area of archaeological importance and the nearby listed buildings and scheduled monument. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area and listed buildings. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which is anticipated will be signed shortly.
5252	Proposed Submission Site Allocations and Policies	IP188 - Websters Saleyard site, Dock Street	Historic England (Mr Tom Gilbert-Woodridge) [243]	The development constraints mention the site's location within the Stoke Conservation Area (currently on the Heritage at Risk Register) and area of archaeological importance and the nearby listed building. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area and listed building. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which it is anticipated will be signed shortly.
5253	Proposed Submission Site Allocations and Policies	IP258 - Land at University Campus Suffolk	Historic England (Mr Tom Gilbert-Woodridge) [243]	The development constraints mention the adjoining conservation area and archaeology issues, but do not refer to the Grade II listed Church of Holy Trinity to the south. However, while the wording explains the implications for development in terms of archaeological matters, there is no explanation of the implications for development in terms of the conservation area and listed building. The lack of clarity could affect proposals for this site. Other sites are clearer in terms of such matters (e.g. IP005).	The proposed to add reference to the Grade II listed Church of Holy Trinity through its Pre-Submission Additional Modifications. The implications for development are contained within the Local Plan policies - the site sheets are provided for information. The Council is producing a Statement of Common Ground with Historic England which it is anticipated will be signed shortly.
5254	Proposed Submission Site Allocations and Policies	5.2	Historic England (Mr Tom Gilbert-Woodridge) [243]	Support but require changes. We welcome the addition of paragraphs relating to the historic environment (5.2, 5.7 and 5.8). This helps towards meeting Paragraph 126 of the NPPF which requires Local Plans to set out a positive strategy for the historic environment. The IP-One Area is of considerable importance in terms of the historic environment, given that it contains the greatest concentration of the town's designated heritage assets, with a number of important sites and opportunity areas. It will be important that area and site specific proposals adequately consider impacts on heritage assets (see separate representations).	The Council proposed to add a sentence to the end of 5.8 through its Pre-Submission Additional Modifications: 'Grade I and II' buildings in Ipswich are dealt with through the national Heritage at Risk register.
5255	Proposed Submission Site Allocations and Policies	5.16	Historic England (Mr Tom Gilbert-Woodridge) [243]	Our 2014 consultation response noted that the Waterfront area forms part of the town's historic environment and contains a number of important heritage assets including listed buildings and the Wet Dock Conservation Area. It is an area that has undergone much change in the past 15 years and continues to be identified for regeneration opportunities. Given the continued development opportunities and the importance of heritage assets, we sought greater reference to the historic environment. The additional wording in Paragraph 5.16 (last two sentences) is welcomed.	This support is welcomed.
5256	Proposed Submission Site Allocations and Policies	5.46	Historic England (Mr Tom Gilbert-Woodridge) [243]	We note that the provision of a new Wet Dock crossing would facilitate access and provide for through traffic, allowing for the calming of the Star Lane Gyrotary once completed. We support the principle of calming of the gyrotary and the opportunities that provides. However, care will need to be taken with regards to the design of the new crossing, as it passes through the conservation area. We welcome the inclusion of a new sentence at the end of paragraph 5.46 which notes the conservation area and requires the crossing to take account of heritage issues.	This support is welcomed.
5257	Proposed Submission Site Allocations and Policies	6.1	Historic England (Mr Tom Gilbert-Woodridge) [243]	We welcome the identification of opportunity areas. However, the identification of development options in each opportunity area does not always correspond with site allocations and often goes much beyond the boundaries of proposed allocations. This potentially creates some confusion and needs clarifying. While we welcome the identification of development principles for each opportunity area, this does not overcome the need for the individual site sheets to contain specific development criteria. The key for each diagram shows listed buildings but not scheduled monuments, which is not helpful in terms of clarity.	The Council proposed the addition of the following text in paragraph 6.1 through its Pre-Submission Additional Modifications: 'The allocation policies of the Plan take precedence in the event of inconsistencies between the Opportunity Area guidance and site allocations.'
5258	Proposed Submission Site Allocations and Policies	Opportunity Area A - Island Site	Historic England (Mr Tom Gilbert-Woodridge) [243]	Support but require changes. This opportunity area is relatively coherent in terms of the site coverage along the waterfront. References to the historic environment are good, including consideration of archaeology issues. We welcome statements such as maintaining the character of the conservation area and the retention of historic structures. The two diagrams show a number of non-listed buildings in bold outline. The key does not explain what these denote, but it appears to relate to retained buildings. This should be clarified.	An additional modification is proposed through the statement of common ground between IBC, SCC and Historic England - please see Matter 8 Statement.
5259	Proposed Submission Site Allocations and Policies	Opportunity Area B - Merchant Quarter	Historic England (Mr Tom Gilbert-Woodridge) [243]	This is a more complex and diverse area than Area A, and perhaps less coherent making it difficult to establish specific development principles relating to specific sites. Current references to the historic environment are welcomed, but there needs to be greater detail with regards to scheduled monuments and archaeology given the rich potential of this area. Scheduled monuments are not shown in either diagram, with 'development options' mapped over the top of every scheduled monument within this area. This is misleading and does not provide sufficient clarity for development proposals.	Through the Pre-submission Main Modifications the Council proposed to add the scheduled monuments to the map.
5260	Proposed Submission Site Allocations and Policies	Opportunity Area C - Mint Quarter / Cox Lane regeneration area and surrounding area	Historic England (Mr Tom Gilbert-Woodridge) [243]	As with Area B, this is a complex and diverse area in terms of the historic environment. Current references to the historic environment are welcomed, but there needs to be greater detail with regards to scheduled monuments and archaeology. The large scheduled monument that runs through this area is not shown on either diagram, with 'development options' mapped over the top. This is misleading and does not provide sufficient clarity for development proposals.	Through the Pre-submission Main Modifications the Council proposed to add the scheduled monuments to the map.
5261	Proposed Submission Site Allocations and Policies	Opportunity Area D - Education Quarter and surrounding area	Historic England (Mr Tom Gilbert-Woodridge) [243]	Support but require changes. References to the historic environment are welcomed, including archaeology, although there are three conservation areas which overlap this opportunity area, not just the Wet Dock (also Central and St Helen's). We note the reference to a minimum of six storeys along the waterfront which could have implications for the historic environment, including the Wet Dock Conservation Area.	SB - we haven't suggested adding ref to conservation areas, is there an explanation? Do we have a response to their minimum 6 storeys concern? The Council is producing a Statement of Common Ground with Historic England which it is anticipated will be signed shortly.
5262	Proposed Submission Site Allocations and Policies	Opportunity Area E - Westgate	Historic England (Mr Tom Gilbert-Woodridge) [243]	Although this area does not contain any designated heritage asset, it is situated between two conservation areas (Central and Burlington Road) and a number of listed buildings, including the Grade II* Churches of St Matthew and St Mary at the Elms and the Grade I Willis Building. Part of the site also lies within the area of archaeological importance. We welcome the additional reference to heritage assets and archaeology as a development principle.	This support is welcomed.
5263	Proposed Submission Site Allocations and Policies	Opportunity Area F - River and Princes Street Corridor	Historic England (Mr Tom Gilbert-Woodridge) [243]	This area contains a listed building and is situated near to other listed buildings (e.g. the Willis Building) and the Central Conservation Area. There may also be archaeology issues, with the area of archaeological importance covering part of the opportunity area. We welcome the additional reference to the historic environment as a development principle.	This support is welcomed.
5272	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Bev Schumann [1360]	Concerned about increases in traffic and concerned about anti-social behaviour including speeding vehicles. Believe there is sufficient social housing in the area. Would not like to see Lavenham Road joined with Kelly Road.	The Highway Authority has not raised safety or access objections to the allocation. Detailed traffic and drainage issues would be taken into account through the detailed planning of the development at planning application stage.
5273	Proposed Submission Site Allocations and Policies	SP4 Land protected for Gypsy and Traveller sites	National Federation of Gypsy Liaison Groups (Mr Roger Yarwood) [1213]	SP4 is different to CS11 in the Core Strategy but they cover the same activity. There should be a single policy covering gypsies and travellers. Policy SP4 is not compliant with paragraph 10 of Planning Policy for Traveller sites under which criteria for considering applications should be established. Criteria a), b) and c) of SP4 should be deleted and applications determined against criteria in the Core Strategy.	Through the Pre-Submission Main Modifications the Council proposes to merge policy SP4 into Policy CS11. Criteria a), b) and c) of SP4 are proposed to be included in policy CS11 and are consistent with paragraph 24 of the national Planning Policy for Travellers' Sites.
5295	Proposed Submission Site Allocations and Policies	SP2 Land Allocated for housing	Suffolk County Council (Mr Robert Feakes) [356]	It does not appear that any sites are undeliverable for transport reasons when considered individually and if an assumption is made that proper provision is made for sustainable transport measures and highway mitigation. This statement needs to be considered against those made on the Core Strategy and cumulative transport impacts.	Noted.
5296	Proposed Submission Site Allocations and Policies	SP5 Land allocated for employment use	Suffolk County Council (Mr Robert Feakes) [356]	It does not appear that any sites are undeliverable for transport reasons when considered individually and if an assumption is made that proper provision is made for sustainable transport measures and highway mitigation. This statement needs to be considered against those made on the Core Strategy and cumulative transport impacts.	Noted.
5297	Proposed Submission Site Allocations and Policies	SP7 Land allocated for leisure uses or community facilities	Suffolk County Council (Mr Robert Feakes) [356]	It does not appear that any sites are undeliverable for transport reasons when considered individually and if an assumption is made that proper provision is made for sustainable transport measures and highway mitigation. This statement needs to be considered against those made on the Core Strategy and cumulative transport impacts.	Noted.

5298	Proposed Submission Site Allocations and Policies	5.41	Suffolk County Council (Mr Robert Feakes) [356]	The County Council is content with policies SP15 and SP16, however the supporting text could be more accurate in respect of the Travel Ipswich programme. Paragraph 5.41 should be amended as follows: 'Due for completion in 2015, it forms part of a wider long term strategy to achieve a 15% switch to more sustainable modes, to enable Ipswich to accommodate planned growth without a corresponding growth in congestion. This will include some further improvements to walking routes from the railway station ...'	These amendments have been taken forward by the Council through the Pre-Submission Additional Modifications.
5299	Proposed Submission Site Allocations and Policies	IP010a - Co Op Depot, Felixstowe Road	Suffolk County Council (Mr Robert Feakes) [356]	This document allocates land at Felixstowe Road/Derby Road (site IP010a) for additional primary school provision. The allocation at IP010a is necessary to enable expansion of the school. The school is already on a small site to meet demand arising from the housing growth planned in the vicinity of the school.	Noted.
5300	Proposed Submission Site Allocations and Policies	IP258 - Land at University Campus Suffolk	Suffolk County Council (Mr Robert Feakes) [356]	This document allocates land at the University (site IP258) for additional primary school provision. Site IP258 is not deliverable for the purposes of Policy CS15 or for mitigating the impact of Town Centre Housing sites. The County Council is considering other options for making suitable primary school provision for demand arising from the Town Centre and intends to have identified another deliverable option by the time of the examination.	The Council has identified site IP258 as suitable and was previously understood to be deliverable. In the absence of any alternative site being put forward the Council maintains this as a suitable site.
5301	Proposed Submission Site Allocations and Policies	SP2 Land Allocated for housing	Suffolk County Council (Mr Robert Feakes) [356]	This document is only deliverable with sufficient infrastructure. Indicative Section 106 costs (education, libraries, waste) and highway requirements are set out in the full representation. Early years: larger sites (>200 dwellings) may need to make on site provision. Primary: in principle, primary school places can be provided (predicated on development funding places, where compliant with the CIL Regulations). Secondary: the new secondary school planned at Garden Suburb (CS10) will also need to mitigate demand arising from background and housing growth across Ipswich. Sites should be deliverable with suitable (SFRA) flood risk measures. Archaeology does not prevent sites being allocated.	Noted. Policy CS17 provides the mechanism for securing infrastructure provision.
5302	Proposed Submission Site Allocations and Policies	IP004 - Bus Depot, Sir Alf Ramsey Way	Suffolk County Council (Mr Robert Feakes) [356]	Allocation IP004 is in close proximity to permitted mineral and waste uses, which represent a constraint on the development of this site. In line with policies in the Minerals and Waste Plans and DM26 of the Ipswich Local Plan are likely to apply to ensure that the new development is compatible with that which is already permitted. If the design of new development at IP004 recognises these constraints, the allocation should prove deliverable.	The Council has added reference to waste and minerals uses and safeguarding through its Pre-Submission Additional Modifications.
5303	Proposed Submission Site Allocations and Policies	IP080 - 240 Werstead Road	Suffolk County Council (Mr Robert Feakes) [356]	Site IP080 needs to recognise the mineral handling facilities at the Port, which are protected through the Minerals Plan and DM26 and are part of the delivery of a wider marine plan	The Council has added reference to minerals uses and safeguarding through its Pre-Submission Additional Modifications.
5304	Proposed Submission Site Allocations and Policies	IP037 - Island Site	Suffolk County Council (Mr Robert Feakes) [356]	Allocation IP037 needs to recognise the mineral handling facilities at the Port, which are protected through the Minerals Plan and DM26 and are part of the delivery of a wider marine plan.	The Council has added reference to minerals uses and safeguarding through its Pre-Submission Additional Modifications.
5305	Proposed Submission Site Allocations and Policies	IP133 - South of Felaw Street	Suffolk County Council (Mr Robert Feakes) [356]	Allocation IP133 needs to recognise the mineral handling facilities at the Port, which are protected through the Minerals Plan and DM26 and are part of the delivery of a wider marine plan.	The Council has added reference to minerals uses and safeguarding through its Pre-Submission Additional Modifications.
5306	Proposed Submission Site Allocations and Policies	IP098 - Transco, south of Pateson Road	Suffolk County Council (Mr Robert Feakes) [356]	Allocation IP098 needs to recognise the mineral handling facilities at the Port, which are protected through the Minerals Plan and DM26 and are part of the delivery of a wider marine plan.	The Council has added reference to minerals uses and safeguarding through its Pre-Submission Additional Modifications.
5308	Proposed Submission Site Allocations and Policies	Opportunity Area D - Education Quarter and surrounding area	Suffolk County Council (Mr Robert Feakes) [356]	The County Council proposes a minor amendment to the approach proposed for the Education Quarter, to slightly widen the range of ancillary education projects which could come forward in the area. It is proposed that the final sentence of the first paragraph be amended as follows: 'Within the defined Education Quarter, development for education and ancillary uses such as student accommodation, heritage and cultural facilities or offices will be permitted.'	Where heritage or cultural facilities are linked to education the policy would already provide for these and there is therefore no need to amend the Policy SP12.
5309	Proposed Submission Site Allocations and Policies	Appendix 3 - Site Allocation Details	Suffolk County Council (Mr Robert Feakes) [356]	SCC appends to the full representation set out additional information relating to sites: Appendix 1: Potential developer contributions Appendix 2: Indicative highway requirements Appendix 3 (mis-labelled 2): Outline surface water assessment Appendix 5: amendments to the archaeological constraints comments affecting certain sites.	Through the Pre-Submission Additional Modifications the Council proposed to add additional information relating to transport to site sheets for IP004, IP005, IP010a and b, IP011b, IP029, IP032, IP033, IP037, IP040, IP043, IP048, IP054, IP059a, IP136 and IP165. Additional information on surface water flooding has been added to site sheets for IP004, IP005, IP006, IP009, IP011b, IP012, IP032, IP033, IP039a, IP040, IP043, IP048, IP054, IP059c, IP066, IP080, IP089, IP096, IP098, IP131, IP133, IP136, IP142, IP165, IP188, IP214, IP245 and IP256. The Council has agreed a Statement of Common Ground with Suffolk County Council and Historic England in relation to the archaeological comments which it is anticipated will be signed shortly.
5312	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Mr Ian Urwin [314]	We object to the proposed building of houses on this area. The area needs a suitable place for children to play safely, residents to walk their dogs and an area where the local community can socialise. This area if utilised properly could be the hub of this area, bringing all residents together. These days people complain that their children need to get out more, this area is an ideal area for this to happen if it is kept as an open green space, and as previously stated this would be an ideal area for the outside Gym and Play Area.	Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation.
5321	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	Mr Stewart Quantrill [995]	Pleased to note that the number of dwellings has been reduced to 18. However, the density is out of character with the area and a lower density should be recommended. The development would diminish the effective use and potential for sport in the local area. It is important to encourage local facilities, especially when considering the effect of traffic related to the planned Northern Fringe development.	The club asserts that the pitch is surplus to its requirements, is a relatively old facility and cannot be used to the full because of the absence of lighting. The allocation policy already requires the provisions of policy DM28 to be met which would mean either that the facility is considered surplus or it is replaced elsewhere. The site density and capacity were reduced in the submission stage allocation, to better fit in with the character of the area.
5323	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Mr Andrew Balie [280]	The Green is an area for the local community. Children play football there and there are many community and sporting events. Concerned about anti-social behaviour if the green is taken away. It was reported in the press that the Council were trying to improve the area for youngsters, why take all this away? Concern expressed about existing and potential problems of parked cars and road safety in the Lavenham Road and Kelly Road area. The Green is lovely to look at and enjoy and should be preserved.	Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation. The Highway Authority has not raised safety or access objections to the allocation.
5339	Proposed Submission Site Allocations and Policies	SP2 Land Allocated for housing	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	The Core Strategy Review fails to identify either sufficient specific deliverable sites for years 1-10 or broad locations for the full housing requirement, and therefore fails the tests of Soundness in terms of Effectiveness, being Positively Prepared, and being consistent with the NPPF.	The Council has sought to identify sufficient land but is unable to identify sufficient sites within its boundary. The Council will therefore work with neighbouring authorities to identify sites to meet housing need.
5344	Proposed Submission Site Allocations and Policies	4.5	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Table 1 - Whilst we accept that meeting the full housing requirement is highly likely to necessitate joint working with neighbouring areas, it is incumbent on Ipswich Borough Council to make best use of land within its own boundary first before it relies on assistance from others. The evidence base, in the form of the SHLAA, shows that it has not done that, because the SHLAA identifies additional opportunities within the Borough boundary, including my client's land, which has previously been tested through and found to be suitable for housing.	The SHLAA update 2013 identified that the site is suitable and available for housing, but that there are infrastructure constraints which would need to be addressed. The site is likely to come forward as part of a larger development beyond a 15 year period. The Council considers that this would be better considered jointly with Suffolk Coastal District Council through planned future work on joint housing delivery within the Ipswich Policy Area.
5347	Proposed Submission Site Allocations and Policies	IP010a - Co Op Depot, Felixstowe Road	Suffolk Wildlife Trust (Dr Simone Bullion) [1438]	Support the principle of development on the site but recommend that a reptile survey is undertaken prior to development.	Through the Pre-Submission Additional Modifications the Council proposes to add reference to the need for an ecological and reptile survey.
5348	Proposed Submission Site Allocations and Policies	IP033 - Land at Bramford Road (Stocks site)	Suffolk Wildlife Trust (Dr Simone Bullion) [1438]	Recommend that a detailed ecological survey is undertaken as well as a reptile survey, but supports the need for a vegetation buffer around the pond.	Through the Pre-Submission Additional Modifications the Council proposes to add reference to the need for an ecological and reptile survey.
5349	Proposed Submission Site Allocations and Policies	IP067 - Former British Energy Site	Suffolk Wildlife Trust (Dr Simone Bullion) [1438]	Recommend an ecological survey prior to vegetation clearance.	Through the Pre-Submission Additional Modifications the Council proposes to add reference to the need for an ecological and reptile survey.
5352	Proposed Submission Site Allocations and Policies	IP029 - Land Opposite 674-734 Bramford Road	Suffolk Wildlife Trust (Dr Simone Bullion) [1438]	Recommend an ecological assessment and reptile survey prior to site clearance	Through the Pre-Submission Additional Modifications the Council proposes to add reference to the need for an ecological and reptile survey.
5353	Proposed Submission Site Allocations and Policies	IP058 - Former Volvo Site, Raeburn Road South	Suffolk Wildlife Trust (Dr Simone Bullion) [1438]	This site is currently a County Wildlife Site a detailed survey will need to be undertaken prior to development.	Through the Pre-Submission Additional Modifications the Council proposes to add reference to the need for an ecological and reptile survey.
5354	Proposed Submission Site Allocations and Policies	IP083 - Banks of river upriver from Princes Street	Suffolk Wildlife Trust (Dr Simone Bullion) [1438]	This area is allocated for public open space and we support the requirement for survey work prior to clearance, as well as retaining the river path and its setting, the design must take into account the need to avoid light spillage within the river corridor.	Through the Pre-Submission Additional Modifications the Council proposes to add reference to the need to avoid light spillage within the river corridor.

5358	Proposed Submission Site Allocations and Policies	Opportunity Area F - River and Princes Street Corridor	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	The Jewson site (IP028b/UC029) should be allocated as a development site and the frontage along this site highlighted as an area for improved public realm/pedestrian links. Its allocation to meet the scale and type of retail and leisure development needed in town centres would help meet the shortfall in sites against the identified needs. The site was identified as a development site in the Opportunity Area G (now F) at Preferred Options stage. L&G understand that the owners indicated that it would not come forward for redevelopment. However, L&G acquired the site in 2009 and the site will now become available.	The Council has allocated the former Odeon Cinema site IP260 for commercial leisure uses. Additional sites are not needed. Currently the site is not allocated but identified as white land within the town centre so would be subject to DM22 (which includes leisure uses).
5359	Proposed Submission Site Allocations and Policies	SP7 Land allocated for leisure uses or community facilities	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	Policy SP7 does not allocate sufficient sites to meet the projected demand for commercial leisure space. The Jewson site (IP028b/UC029) must be considered for town centre use including leisure. The [NPPF] requirement to allocate sufficient sites for leisure development is reinforced by the 2013 DTZ report, which recognises that the centre has a relative lack of leisure and food/drink units. Policy SP7 allocates only one site for leisure development (the former Odeon Cinema, c. 2,500 sq m). This does not meet demand for commercial leisure (A3&EA5 only) up to 2016 (forecast at 2,660-4,000sq m (net)).	The Council has allocated the former Odeon Cinema site IP260 for commercial leisure uses. Additional sites are not needed. Currently the site is not allocated but identified as white land within the town centre so would be subject to DM22 (which includes leisure uses).
5360	Proposed Submission Site Allocations and Policies	SP10 Retail Site Allocation	Legal and General Assurance Society Limited (L&G) (Mr Alfred Yeatman) [1454]	The DTZ report provides insufficient evidence to justify the reduction in new retail floorspace. The 2010 retail capacity study should be updated now to inform policy. Policy is not positively prepared and could sterilise Ipswich town centre for medium to large scale retail development for 11 years, having serious implications on the vitality and viability of the centre. The Jewson site must be considered for town centre use including retail.	The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed. Currently the site is not allocated but identified as white land within the town centre so would be subject to DM22 (which includes leisure uses).
5374	Proposed Submission Site Allocations and Policies	IP048 - Mint Quarter / Cox Lane	Boyer Planning (Mr Matt Clarke) [293]	The East of England Co-operative Society support redevelopment of the Mint Quarter. It is considered that an element of flexibility should be applied to the mix of uses that would be considered acceptable in this area, in order to maximise the potential for achievement of regeneration of this important site. Such flexibility should also extend to the façade of parts of the former Co-operative department store frontage to Carr Street, following inclusion in the Local List SPD.	The main objective for this site is to deliver town centre housing to meet needs. There is also a need for public short stay car parking and open space, therefore these are the uses specified. The policy recommends the preparation of a master plan to determine the detailed configuration of uses on this site and the adjacent land to the west. The aim should be to retain the locally listed façade but ultimately it would be considered against policy DM9.
5375	Proposed Submission Site Allocations and Policies	IP031 - Burrell Road	Boyer Planning (Mr Matt Clarke) [293]	The East of England Co-operative Society support this proposed allocation for residential redevelopment.	This support is welcomed.
5381	Proposed Submission Site Allocations and Policies	SP2 Land Allocated for housing	Applekirk Properties Ltd (Teresa Cook) [1452]	The approach to proposals for retail development in the Site Allocations Plan is at odds with the evidence base and crucially underplays the need to accommodate retail growth in the town. Applekirk Properties Ltd supports the allocation of sites IP043, IP136, IP052 and IP035 for mixed use development that will contribute to the regeneration of the Waterfront/Merchant's Quarter, but objects to the failure to provide for retail development in excess of 200 sq m within these sites. Policies CS2, CS3 and CS5 fail to meet the requirement for comparison retail identified in the evidence base.	IP043: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. There is some flexibility around the percentage of the mix of housing with B1 office and/or leisure to support viability and the heritage asset constraints of the site are acknowledged. IP136: The site is located on the Waterfront's Northern Quays. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location, outside the Central Shopping Area and so far from the prime pitch of Tavern Street - Westgate Street. There is some flexibility around the percentage of the mix of housing with B1 office to support viability. IP052: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040 for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. Policy SP3 already allows some flexibility around the mix of uses, provided that redevelopment is residential-led. However, retail development would not be supported in this location. IP035: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location, outside the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. The allocation reflected the lapsed planning permission, however its failure to be delivered and the sensitivity of the site in terms of heritage assets may lead to the allocation being removed. The site would then lie within the town centre and proposals would be considered on their merits, however retail use would be resisted.
5382	Proposed Submission Site Allocations and Policies	SP3 Land with planning permission or awaiting a Section 106	Applekirk Properties Ltd (Teresa Cook) [1452]	The approach to proposals for retail development in the Site Allocations Plan is at odds with the evidence base and crucially underplays the need to accommodate retail growth in the town. Applekirk Properties Ltd supports the allocation of sites IP043, IP136, IP052 and IP035 for mixed use development that will contribute to the regeneration of the Waterfront/Merchant's Quarter, but objects to the failure to provide for retail development in excess of 200 sq m within these sites. Policies CS2, CS3 and CS5 fail to meet the requirement for comparison retail identified in the evidence base.	IP043: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. There is some flexibility around the percentage of the mix of housing with B1 office and/or leisure to support viability and the heritage asset constraints of the site are acknowledged. IP136: The site is located on the Waterfront's Northern Quays. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location, outside the Central Shopping Area and so far from the prime pitch of Tavern Street - Westgate Street. There is some flexibility around the percentage of the mix of housing with B1 office to support viability. IP052: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040 for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. Policy SP3 already allows some flexibility around the mix of uses, provided that redevelopment is residential-led. However, retail development would not be supported in this location. IP035: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. The allocation reflected the lapsed planning permission, however its failure to be delivered and the sensitivity of the site in terms of heritage assets may lead to the allocation being removed. The site would then lie within the town centre and proposals would be considered on their merits, however retail use would be resisted.
5383	Proposed Submission Site Allocations and Policies	SP5 Land allocated for employment use	Applekirk Properties Ltd (Teresa Cook) [1452]	The approach to proposals for retail development in the Site Allocations Plan is at odds with the evidence base and crucially underplays the need to accommodate retail growth in the town. Applekirk Properties Ltd supports the allocation of sites IP043, IP136, IP052 and IP035 for mixed use development that will contribute to the regeneration of the Waterfront/Merchant's Quarter, but objects to the failure to provide for retail development in excess of 200 sq m within these sites. Policies CS2, CS3 and CS5 fail to meet the requirement for comparison retail identified in the evidence base.	
5384	Proposed Submission Site Allocations and Policies	IP043 - Commercial Buildings and Jewish Burial Ground, Star Lane	Applekirk Properties Ltd (Teresa Cook) [1452]	The approach to proposals for retail development in the Site Allocations Plan is at odds with the evidence base and crucially underplays the need to accommodate retail growth in the town. Applekirk Properties Ltd supports the allocation of sites IP043, IP136, IP052 and IP035 for mixed use development that will contribute to the regeneration of the Waterfront/Merchant's Quarter, but objects to the failure to provide for retail development in excess of 200 sq m within these sites. Policies CS2, CS3 and CS5 fail to meet the requirement for comparison retail identified in the evidence base.	IP043: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. There is some flexibility around the percentage of the mix of housing with B1 office and/or leisure to support viability and the heritage asset constraints of the site are acknowledged.
5385	Proposed Submission Site Allocations and Policies	IP136 - Silo, College Street	Applekirk Properties Ltd (Teresa Cook) [1452]	The approach to proposals for retail development in the Site Allocations Plan is at odds with the evidence base and crucially underplays the need to accommodate retail growth in the town. Applekirk Properties Ltd supports the allocation of sites IP043, IP136, IP052 and IP035 for mixed use development that will contribute to the regeneration of the Waterfront/Merchant's Quarter, but objects to the failure to provide for retail development in excess of 200 sq m within these sites. Policies CS2, CS3 and CS5 fail to meet the requirement for comparison retail identified in the evidence base.	IP136: The site is located on the Waterfront's Northern Quays. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location, outside the Central Shopping Area and so far from the prime pitch of Tavern Street - Westgate Street. There is some flexibility around the percentage of the mix of housing with B1 office to support viability.
5386	Proposed Submission Site Allocations and Policies	IP052 - Land between Lower Orwell Street & Star Lane	Applekirk Properties Ltd (Teresa Cook) [1452]	The approach to proposals for retail development in the Site Allocations Plan is at odds with the evidence base and crucially underplays the need to accommodate retail growth in the town. Applekirk Properties Ltd supports the allocation of sites IP043, IP136, IP052 and IP035 for mixed use development that will contribute to the regeneration of the Waterfront/Merchant's Quarter, but objects to the failure to provide for retail development in excess of 200 sq m within these sites. Policies CS2, CS3 and CS5 fail to meet the requirement for comparison retail identified in the evidence base.	IP052: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040 for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. Policy SP3 already allows some flexibility around the mix of uses, provided that redevelopment is residential-led. However, retail development would not be supported in this location.
5387	Proposed Submission Site Allocations and Policies	IP035 - Key Street / Star Lane / Burtons Site	Applekirk Properties Ltd (Teresa Cook) [1452]	The approach to proposals for retail development in the Site Allocations Plan is at odds with the evidence base and crucially underplays the need to accommodate retail growth in the town. Applekirk Properties Ltd supports the allocation of sites IP043, IP136, IP052 and IP035 for mixed use development that will contribute to the regeneration of the Waterfront/Merchant's Quarter, but objects to the failure to provide for retail development in excess of 200 sq m within these sites. Policies CS2, CS3 and CS5 fail to meet the requirement for comparison retail identified in the evidence base.	IP035: This is an important site within the Merchant Quarter linking the town centre to the Waterfront. The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development. Additional sites are not needed and the evidence does not support retail allocations in this location so far from the prime pitch of Tavern Street - Westgate Street. The allocation reflected the lapsed planning permission, however its failure to be delivered and the sensitivity of the site in terms of heritage assets may lead to the allocation being removed. The site would then lie within the town centre and proposals would be considered on their merits, however retail use would be resisted.

5392	Proposed Submission Site Allocations and Policies	SP10 Retail Site Allocation	Applekirk Properties Ltd (Teresa Cook) [1452]	SP10 is not positively prepared or justified as the allocations included do not seek to meet the requirement for comparison retail identified in the evidence base. Insufficient sites are identified to meet the requirements for retail floorspace over the plan period, particularly for comparison goods. The evidence base identifies a requirement for additional retail floorspace. A single site is proposed for new retail development in the town centre (Westgate), which is carried forward as an existing commitment. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed.	The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street.
5394	Proposed Submission Site Allocations and Policies	SP11 The Waterfront	Applekirk Properties Ltd (Teresa Cook) [1452]	SP11 is not positively prepared or justified as the allocations included do not seek to meet the requirement for comparison retail identified in the evidence base. Insufficient sites are identified to meet the requirements for retail floorspace over the plan period, particularly for comparison goods. The evidence base identifies a requirement for additional retail floorspace. A single site is proposed for new retail development in the town centre (Westgate), which is carried forward as an existing commitment. The NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail development needed.	The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street.
5395	Proposed Submission Site Allocations and Policies	Opportunity Area B - Merchant Quarter	Applekirk Properties Ltd (Teresa Cook) [1452]	The Opportunity Area guidance in Part C is inconsistent with the assumptions and content of site specific allocations in Policies SP2, SP3, SP5, and Tables 1-3. Opportunity Area B Merchant Quarter identifies a Development Opportunity for mixed use (max 50% residentially). In SP2/3/4 Table 1 and SP3/4 Table 2 there are instances where the assumed residential component exceeds 50% (IP043, IP052, IP136). Development Principles suggest that there should generally be a limit of 3 storey development, rising to 5 storeys in some instances, but for allocations IP136 and IP132, the assumed capacity is derived from a development scenario which is 10 storeys.	Through the Pre-Submission Additional Modifications the Council has added text to the start of Part C stating that the allocation policies take precedence if there are inconsistencies, and the guidance should be checked to correct inconsistencies.
5397	Proposed Submission Site Allocations and Policies	Opportunity Area F - River and Princes Street Corridor	Applekirk Properties Ltd (Teresa Cook) [1452]	The Opportunity Area guidance in Part C is inconsistent with the assumptions and content of site specific allocations in Policies SP2, SP3, SP5, and Tables 1-3. In Opportunity Area F, River Corridor, the Development Opportunity identified is for office-led, mixed use with leisure and car parking. Under SP3, Site IP047 which lies within this Opportunity Area is allocated for residential-led mixed uses. It is not clear which content will take precedence.	Through the Pre-Submission Additional Modifications the Council has added text to the start of Part C stating that the allocation policies take precedence if there are inconsistencies, and the guidance should be checked to correct inconsistencies.
5428	Proposed Submission Site Allocations and Policies	IP089 - Waterworks Street	Boyer Planning (Mr Matt Clarke) [293]	Support allocation	This support is welcomed.
5435	Proposed Submission Site Allocations and Policies	SP10 Retail Site Allocation	Coes (Mr William Coe) [1435]	This policy of focussing on the Westgate seems to contradict everything within that master plan and sends another skewed message in terms of where development in the town should take place. We believe that the council should stick with the town centre master plan and focus on the north/south access development rather than divert anything to a Westgate development, which runs contrary to this policy as set out in the master plan. We would urge the Council, despite the so called knowledge of the DTZ report, to work together with local stakeholders and follow the consensus view.	The Town Centre Master Plan is aspirational and the Council needs to weigh aspiration with deliverability. The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street. The Council remains committed to developing a stronger north-south axis for the town centre and Waterfront but considers that this could be achieved through uses other than large scale retail in the Merchant Quarter, including office, leisure and residential. This would help to create footfall and vibrancy and provide attractive, safe, overlooked routes. The Council will continue to work with town centre partners to deliver the Master Plan's vision.
5436	Proposed Submission Site Allocations and Policies	IP058 - Former Volvo Site, Raeburn Road South	Anglian Water (Sue Bull) [359]	Relating to the proposed sites located in proximity to the Water Recycling Centres-WRCs (formally referred to as Sewage or Wastewater Treatment Works), - although reference is made in the text to their location in relation to the WRC, it is recommended that there is a requirement that an odour assessment (in liaison with the WRC operator) is carried out to assess the risk of odour impact on the proposed development to ascertain the suitability of the site for residential development. The sites are IP058 IP067 and IP099	The sites have been allocated only for employment uses through policy SP5, as a result of the odour issues from the Cliff Quay Sewage Treatment Works.
5437	Proposed Submission Site Allocations and Policies	IP067 - Former British Energy Site	Anglian Water (Sue Bull) [359]	Relating to the proposed sites located in proximity to the Water Recycling Centres-WRCs (formally referred to as Sewage or Wastewater Treatment Works), - although reference is made in the text to their location in relation to the WRC, it is recommended that there is a requirement that an odour assessment (in liaison with the WRC operator) is carried out to assess the risk of odour impact on the proposed development to ascertain the suitability of the site for residential development. The sites are IP058 IP067 and IP099	The sites have been allocated only for employment uses through policy SP5, as a result of the odour issues from the Cliff Quay Sewage Treatment Works.
5438	Proposed Submission Site Allocations and Policies	IP099 - Part former Volvo Site, Raeburn Road South	Anglian Water (Sue Bull) [359]	Relating to the proposed sites located in proximity to the Water Recycling Centres-WRCs (formally referred to as Sewage or Wastewater Treatment Works), - although reference is made in the text to their location in relation to the WRC, it is recommended that there is a requirement that an odour assessment (in liaison with the WRC operator) is carried out to assess the risk of odour impact on the proposed development to ascertain the suitability of the site for residential development. The sites are IP058 IP067 and IP099	The sites have been allocated only for employment uses through policy SP5, as a result of the odour issues from the Cliff Quay Sewage Treatment Works.
5452	Proposed Submission Site Allocations and Policies	SP15 Improving Pedestrian and Cycle Routes	Ipswich Central (Mr Paul Clement) [1423]	We also support improved pedestrian routes and vistas from the town centre to/from the Waterfront. Equally, we do not think that the traffic on Star Lane should be thought of as preventing this.	Policy SP15 includes reference to improving pedestrian and cycling links between the Central Shopping Area and the Waterfront.
5453	Proposed Submission Site Allocations and Policies	IP040 and IP041 - Civic Centre Area / Civic Drive	Ipswich Central (Mr Paul Clement) [1423]	Site IP040 and IP041 - this site should not be allocated for retail, but for primarily residential development.	The Ipswich Central vision is aspirational and the Council needs to weigh aspiration with deliverability. The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street. The Council remains committed to developing a stronger north-south axis for the town centre and Waterfront but considers that this could be achieved through uses other than large scale retail in the Merchant Quarter, including office, leisure and residential. This would help to create footfall and vibrancy and provide attractive, safe, overlooked routes. The Council will continue to work with town centre partners to deliver the Master Plan's vision.
5454	Proposed Submission Site Allocations and Policies	IP048 - Mint Quarter / Cox Lane	Ipswich Central (Mr Paul Clement) [1423]	Site IP048 - the area of this site that sits closest to Upper Brook Street should be allocated for a modern 'big-box' retail cluster. We envisage something like an out-of-town retail development with parking, built on this in-town site.	The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development, based on evidence about the deliverability of potential retail sites. IP040 provides the opportunity for big box retailing. The west side of the Mint Quarter also remains within the contracted Central Shopping Area boundary, identified as secondary shopping frontage, and therefore retail development could take place there. This allocation is just for the eastern side of the former Mint Quarter site. The name issue is noted. SP2 refers also to the Cox Lane regeneration area.
5455	Proposed Submission Site Allocations and Policies	SP15 Improving Pedestrian and Cycle Routes	Ipswich Central (Mr Paul Clement) [1423]	Upper Brook Street (P46) and Museum Street - we would like to see both streets pedestrianised and high-quality residential development returned to Museum Street south. The latter appears to be omitted.	At present the two roads are used as part of the town centre bus gyratory allowing people to access the places they need to access on both sides of the town. Consultation in 2015 by the Highways Authority on changes to town centre routes did not include additional pedestrianisation proposals over and above Princes Street/Queen Street. Museum Street lies outside the Central Shopping Area and could become more residential in use over time under the current plan policies (DM25 would allow this change provided there is no reasonable prospect of the site being re-used for employment purposes).
5456	Proposed Submission Site Allocations and Policies	5.4	Ipswich Central (Mr Paul Clement) [1423]	Section 5.4 (P38) - whilst the document states that the plan is consistent with the Masterplan and Vision, there are substantial and important elements that are not consistent. The emphasis towards a north-south progression (section 5.5 P38) is not consistent with the planned retail development on the Westgate area.	The Town Centre Master Plan is aspirational and the Council needs to weigh aspiration with deliverability. The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street. The Council remains committed to developing a stronger north-south axis for the town centre and Waterfront but considers that this could be achieved through uses other than large scale retail in the Merchant Quarter, including office, leisure and residential. This would help to create footfall and vibrancy and provide attractive, safe, overlooked routes. The Council will continue to work with town centre partners to deliver the Master Plan's vision.
5457	Proposed Submission Site Allocations and Policies	IP010a - Co Op Depot, Felixstowe Road	Boyer Planning (Mr Matt Clarke) [293]	The East of England Co-operative Society considers that to ensure that the policy is effective and justified the land required for school expansion should be more clearly substantiated.	Page 16 of the County Council's Education and Learning Infrastructure Plan identifies a need for additional spaces at Rose Hill Primary School.
5458	Proposed Submission Site Allocations and Policies	IP010a - Co Op Depot, Felixstowe Road	Boyer Planning (Mr Matt Clarke) [293]	The proposed allocation of this site for primarily residential use along with land for extension of the adjacent Rosehill Primary School is supported by the East of England Co-operative Society. To ensure that the policy is effective and justified the land required for school expansion should be more clearly substantiated. Exclusion of the southern part of land fronting Derby Road from the proposed allocation boundary is illogical and should be reinstated. A flexible approach to Section 106 contribution requirements needs to be applied in the context of viability considerations and competing demands from the site.	The Council supports the amendment of the boundary to include the land to the south and fronting onto Derby Road. The requirement for S106 contributions would be considered against Policy CS16.
5459	Proposed Submission Site Allocations and Policies	IP006 - Co Op Warehouse, Pauls Road	Boyer Planning (Mr Matt Clarke) [293]	The East of England Co-operative Society support this proposed allocation for residential redevelopment. The site is in a sustainable location, close to a wide range of facilities and services, including shops, employment and public transport, with access to the town centre and railway station.	Noted.

5460	Proposed Submission Site Allocations and Policies	5.13	Ipswich Central (Mr Paul Clement) [1423]	Section 5.13 (Page 40) - we disagree strongly that this is the only site available for retail development. Greater emphasis should also be placed upon finding alternative uses for uneconomic and underused retail units in secondary locations - primarily Carr Street (east) and Westgate Street (west) - and improvement to provision between Tower Ramparts/Cornhill southwards.	The Ipswich Central vision is aspirational and the Council needs to weigh aspiration with deliverability. The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street. The Council remains committed to developing a stronger north-south axis for the town centre and Waterfront but considers that this could be achieved through uses other than large scale retail in the Merchant Quarter, including office, leisure and residential. This would help to create footfall and vibrancy and provide attractive, safe, overlooked routes. The Council will continue to work with town centre partners to deliver the Master Plan's vision.
5461	Proposed Submission Site Allocations and Policies	SP14 Arts, Culture and Tourism	Ipswich Central (Mr Paul Clement) [1423]	Policy SP14 (P44) - the support that the Council shows for a conference/exhibition space is welcomed, but substantially more detail is required for what exactly is planned here and how it could be achieved. There has been talk of a new 'attraction' and, again, this needs consideration.	It would be for others to bring forward such development. The Council is simply allowing flexibility for such a use at the Waterfront through this policy.
5463	Proposed Submission Site Allocations and Policies	SP17 Town Centre Car Parking	Ipswich Central (Mr Paul Clement) [1423]	Car Parking (SP17) - Ipswich must be made more appealing to the car-borne visitor, not less. Plans to rebuild Crown Street car park are to be welcomed. The new car park must include good quality spaces and a much improved link across Crown Street.	The link across Crown Street could be improved outside the auspices of this plan and would be a matter for the Highway Authority. It is difficult to imagine what alternative form the crossing could take, as Crown Street is a busy thoroughfare. Through the Pre-Submission Additional Modifications the Council has included text to state 'The redevelopment should deliver accessibility, legibility and attractiveness of the public realm.'
5464	Proposed Submission Site Allocations and Policies	5.52	Ipswich Central (Mr Paul Clement) [1423]	Car Parking (section 5.52 P50) - we are not convinced that Travel Ipswich has 'encouraged mode switching' in the way described or aspired to. It may, instead, have simply reduced visitors which is to the detriment of the town. We are extremely concerned about the way in which this section appears to indicate continuing with an anti-car direction.	Travel Ipswich is not yet fully implemented and as such it is too soon to draw any conclusions regarding its impact. The National Planning Policy Framework states that 'the transport system needs to be balanced in favour of sustainable modes.' (paragraph 29).
5465	Proposed Submission Site Allocations and Policies	Opportunity Area A - Island Site	Ipswich Central (Mr Paul Clement) [1423]	Island Site (P56) - we are encouraged by the 'Enterprise Island' plans, particularly if an integrated transport improvement is included. The plans most recently revealed go further than the Development Plan suggests.	Noted. Part of the Island Site is now an Enterprise Zone.
5466	Proposed Submission Site Allocations and Policies	Opportunity Area B - Merchant Quarter	Ipswich Central (Mr Paul Clement) [1423]	Merchant Quarter (P62) - we are broadly supportive of a mixed residential, retail and restaurant/cafe development. Car parking should be included, if possible.	Noted. Short stay car parking is included as a potential use as part of allocation IP054 in the merchant quarter.
5467	Proposed Submission Site Allocations and Policies	Opportunity Area C - Mint Quarter / Cox Lane regeneration area and surrounding area	Ipswich Central (Mr Paul Clement) [1423]	Mint Quarter (P64) - the name should be dropped as it is associated with failure. In addition to the proposals, we consider this site could be used for the 'big box retail cluster' outlined above. There may also be potential for it to be used as a single bus station, although the site currently occupied by Jewsons may offer this potential also.	The Council has allocated the Westgate site IP040, which adjoins the Central Shopping Area, for new retail development, based on evidence about the deliverability of potential retail sites. IP040 provides the opportunity for big box retailing. The west side of the Mint Quarter also remains within the contracted Central Shopping Area boundary, identified as secondary shopping frontage, and therefore retail development could take place there. This allocation is just for the eastern side of the former Mint Quarter site. The name issue is noted. SP2 refers also to the Cox Lane regeneration area.
5468	Proposed Submission Site Allocations and Policies	Opportunity Area F - River and Princes Street Corridor	Ipswich Central (Mr Paul Clement) [1423]	River and Princes Street Corridor (P74) - we have previously resisted comprehensive retail development on part of this site. We continue to do so and are pleased that this has been dropped in the new plan. We consider there to be potential on the waterfront element for residential development. We fully support new office development in Princes Street.	This support is welcomed.
5469	Proposed Submission Site Allocations and Policies	7.3	Ipswich Central (Mr Paul Clement) [1423]	Section 7.3 (P78) - we are disappointed and extremely surprised that neither Ipswich Central nor the Greater Ipswich Partnership are viewed as 'key partnerships' in helping to deliver any plans for the town centre or beyond.	Through the Pre-Submission Additional Modifications the Council proposed to add reference to Ipswich Central and the Greater Ipswich Partnership.
5492	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Miss Georgina Hammond [333]	The roads in Lavenham Road are not wide enough to cater for more cars, the dust carts can't even access roads when cars are parked on it. Also there aren't enough green/natural areas in the area so why do you need to take more away from the community.	Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation.
5493	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr & Mrs Peter and Mary Sawyer [1414]	The potential change and the development seems badly conceived, serving the interests of the developer but no-one else. Our green spaces need to be protected not destroyed.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21st Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5514	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr S A Bates [1395]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproyngton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Clayton and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21st Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5515	Proposed Submission Site Allocations and Policies	SP1 The Protection of allocated sites	Corindale Properties Ltd [1424]	The company's land located off Toller Road is annotated on the proposals map as a site to be used exclusively for employment purposes. This is considered to be unduly restrictive in the context of a still uncertain economy and ignores attempts to market the site for employment use over 10 years. The policy ought to reflect that at the very least an element of other land uses e.g. limited retail and/or residential should be incorporated into the policy for the allocation of the specific parcel of land (reference 208). The allocation should be changed or mixed use to deliver regeneration.	Some flexibility has been built into policy DM25. This is not considered a suitable location for retail development as it is outside the central shopping area.
5516	Proposed Submission Site Allocations and Policies	SP5 Land allocated for employment use	Corindale Properties Ltd [1424]	The company's land located off Toller Road is annotated on the proposals map as a site to be used exclusively for employment purposes. This is considered to be unduly restrictive in the context of a still uncertain economy and ignores attempts to market the site for employment use over 10 years. The policy ought to reflect that at the very least an element of other land uses e.g. limited retail and/or residential should be incorporated into the policy for the allocation of the specific parcel of land (reference 208). The allocation should be changed or mixed use to deliver regeneration.	Some flexibility has been built into policy DM25. This is not considered a suitable location for retail development as it is outside the central shopping area.
5517	Proposed Submission Site Allocations and Policies	SP17 Town Centre Car Parking	RCP Parking Ltd [1418]	RCP parking Ltd considers that the whole approach to the control of parking in the central area and the future of provision of multi-storey car parks is entirely aspirational and not deliverable. Further, this policy ignores the very real contribution that sites such as those operated for a temporary period for short-stay parking (e.g. Handford Road, Princes Street, St Peters Warehouse site for example) make to the people working, shopping and undertaking leisure pursuits in Ipswich.	The approach to car parking has been determined by weighing the need to support town centre vitality and viability with the need to encourage sustainable transport. In relation to temporary car parks, the Council has successfully resisted further provision at appeal. The policy allows for the renewal of existing temporary car parks. The Central Car Parking Core is a restrictive policy therefore it would be illogical to move the boundary to include more car parks.
5518	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	Sports England (Mr Philip Raiswell) [290]	No objection [to site IP256] provided the supporting text clearly indicates the need for quantitative or qualitative replacement provision, depending on the findings of the Playing Pitch Strategy currently being carried out by Ipswich Borough Council.	This is covered by the text in the site sheet.
5519	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Mr Stephen Noakes [1354]	The green is a strong local asset which allows residents to meet regularly. The development of the green will have a detrimental effect on house values, lead to loss of light to existing property, exacerbate existing parking, traffic flow and road safety issues, and lead to loss of wildlife habitat. Concern that the consultation was not adequately advertised.	The site has long been allocated for development - until now the expectation has been that it would be developed as a primary school but the County Council has confirmed that the site is no longer needed for this purpose. The Highway Authority has not raised safety or access objections to the allocation. Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation. Detailed traffic and drainage issues would be taken into account through the detailed planning of the development at planning application stage. The allocation establishes the principle of residential use on the site. Two site notices were erected, one at Lavenham Road on the site's south-eastern boundary and one on Kelly Road on the site's north-western boundary.
5520	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Ashley Shum-Finch [1353]	The green is a strong local asset which allows residents to meet regularly. The development of the green will have a detrimental effect on house values, lead to loss of light to existing property, exacerbate existing parking, traffic flow and road safety issues, and lead to loss of wildlife habitat. Concern that the consultation was not adequately advertised.	The site has long been allocated for development - until now the expectation has been that it would be developed as a primary school but the County Council has confirmed that the site is no longer needed for this purpose. The Highway Authority has not raised safety or access objections to the allocation. Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation. Detailed traffic and drainage issues would be taken into account through the detailed planning of the development at planning application stage. The allocation establishes the principle of residential use on the site. Two site notices were erected, one at Lavenham Road on the site's south-eastern boundary and one on Kelly Road on the site's north-western boundary.
5524	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Fran Barber [1303]	Wish to object to the proposed allocation as the Green is used by local children to play football and cricket, children feel safer playing there than out of sight in the park, the Green is used by the local church for fun days and concerned about the increase in traffic on the narrow road.	The Highway Authority has not raised safety or access objections to the allocation. Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation. Detailed traffic and drainage issues would be taken into account through the detailed planning of the development at planning application stage.
5525	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Ms Mia Quinlan [318]	The Green is currently a nice open space used by youngsters and for fetes and football. Do not wish to be overlooked and surrounded by more houses. The open space is lovely and well kept, not a derelict building site.	Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation.

5527	Proposed Submission Site Allocations and Policies	SP17 Town Centre Car Parking	RCP Parking Ltd [1418]	RCP Parking Ltd object to the delineated boundary of the central parking core as shown on the proposals map and considered that it should be changed and extended to include a number of sites which are making a very effective contribution towards parking provision for the people of Ipswich and will do so and can do so for the foreseeable future. In particular, the exclusion of sites:- Duke Street on Orwell Quay Princes Street Handford Road East Ranelagh Road, St Peter's Warehouse site on Bridge Street should be included and the boundary adjusted accordingly.	The approach to car parking has been determined by weighing the need to support town centre vitality and viability with the need to encourage sustainable transport. In relation to temporary car parks, the Council has successfully resisted further provision at appeal. The policy allows for the renewal of existing temporary car parks. The Central Car Parking Core is a restrictive policy therefore it would be illogical to move the boundary to include more car parks.
5528	Proposed Submission Site Allocations and Policies	IP096 - Car Park Handford Road East	RCP Parking Ltd [1418]	RCP Parking Ltd support the allocation of their site in principle for residential purposes but the decision of when to develop/dispose should be part of their commercial strategy rather than the council is planning authority or a third party. The draft allocation indicates that has a short term delivery timescale but the company has not been consulted on its own business plans. Had it been so consulted it would have reaffirmed the need for flexibility and the certainty of interim beneficial uses such as shortstay car parking in a continuing difficult economic climate.	The Council bases its housing trajectory estimates of when sites may be delivered on information provided by owners or developers through the regular updates of the Strategic Housing Land Availability Assessment. Alternative uses in the meantime would be considered against the all relevant policies of the plan.
5533	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	Ipswich Sports Club [1417]	Support the allocation of land for residential development and confirm that the site is available and deliverable now.	This support is welcomed.
5553	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Mr Tyler Harding [1245]	I am writing to object to the proposed plans for building on the green between Lavenham and Kelly Road. My fiance and I are new residents to Lavenham Road as we bought our house in December and we are extremely upset to hear that there are plans to build on the green.	Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation.
5554	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Mrs Julie Goold [315]	I cannot believe that this may still be passed as I feel that not only will added traffic going through this quiet road be dangerous but especially in winter when Lavenham Road hill is already a hazard in icy conditions with cars etc unable to get up the hill as hardly ever griated and my property at the bottom of the hill is just another accident waiting to happen AGAIN! When we bought our first house in Mildon Road which was a new build, we were told that the green would never be built on.	The site has long been allocated for development – until now the expectation has been that it would be developed as a primary school but the County Council has confirmed that the site is no longer needed for this purpose. The Highway Authority has not raised safety or access objections to the allocation. Detailed traffic and drainage issues would be taken into account through the detailed planning of the development at planning application stage.
5572	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Terri Thorpe [1212]	Object to development of this land as it is an open area used for community events, dog walking, and by children playing. There is already parking congestion and this will add additional pressure. Understood the land could only be used for building a school.	The site has long been allocated for development – until now the expectation has been that it would be developed as a primary school but the County Council has confirmed that the site is no longer needed for this purpose. The Highway Authority has not raised safety or access objections to the allocation. Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation. Detailed traffic and drainage issues would be taken into account through the detailed planning of the development at planning application stage. The allocation establishes the principle of residential use on the site.
5586	Proposed Submission Site Allocations and Policies	IP040 and IP041 - Civic Centre Area / Civic Drive	Ipswich Conservative Group [1814]	IP040 and IP041 Civic Centre Area – this should not be designated as mainly a retail area and we believe that a shrinking of the town centre, by making both ends a mix of homes and small independent shops, as well as leisure facilities, would create footfall in the town centre and be a more attractive experience for shoppers.	The Council's evidence indicates that over the plan period, additional retail floorspace will be needed and that the Westgate site is the most suitable and deliverable of the options available, for reasons including that it relates best to the prime pitch of Tavern Street-Westgate Street. However, the allocation incorporates an element of residential use.
5601	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	House of Commons (MP Dan Poulter) [1170]	Understand that Ipswich Sports Club has applied to Ipswich Borough Council for the land that the artificial grass hockey pitch sits on to be included in the local plan for building, in order to increase its leisure facilities and create a 'hockey-hub'. I also understand that Ipswich Borough Council are conducting a strategic review of sports facilities which is due to be completed in March/April 2015. Wish to support Ipswich Sports Club and ask the Council to consider the development of their sports facilities in the strategic review.	Noted. The Playing Pitch Strategy will include consideration of provision for hockey.
5614	Proposed Submission Site Allocations and Policies	SP5 Land allocated for employment use	Ashfield Land Limited (Mr Paul Derry) [1122]	Ashfield Land supports the identification of the site 'Land North of Whitton Lane' Site ref IP140 (UC257) for employment development. The site is strategically located within the Ipswich Policy Area beside the A14 and adjoins the existing Anglia Park employment area. Table 3 within draft policy SP5 notes the site is 'suitable primarily for B1 with some B2 and B8'. Whilst the introduction of reference to classes B2 and B8 is welcomed, the emphasis on class B1 remains adversely restrictive.	The allocation is reflective of the floorspace requirements identified in the Employment Land Needs Assessment (PSCD10).
5615	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Ashfield Land Limited (Mr Paul Derry) [1122]	Ashfield Land supports the identification of the site 'Land North of Whitton Lane' Site ref IP140 (UC257) for employment development. The site is strategically located within the Ipswich Policy Area beside the A14 and adjoins the existing Anglia Park employment area.	This support is welcomed.
5619	Proposed Submission Site Allocations and Policies	SP8 Orwell Country Park Extension	Natural England (Mr John Jackson) [1413]	Further to our previous concerns about Pond Hall, we welcome the inclusion of new policy SP8. IBC has committed to carrying out a study into visitor use and bird disturbance around Orwell Country Park and Pond Hall, which will provide a baseline and be used to inform visitor management measures at the park. Natural England advises that with these measures in place, as informed by the study, the policy is not likely to have a significant effect in terms of the Habitats Regulations. The planned visitor centre feasibility study should include a separate project level Habitats Regulations Assessment.	The Council has signed a Statement of Common Ground which includes reference to agreement in relation to the findings of the Orwell Country Park Visitor Survey.
5628	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Mrs Jill Howard [275]	It would become a slum area - houses/flats on top of each other; it would be cramming houses/flats into such a small area which draws a fine line between planning and cramming; noise pollution; we are very quiet whereas with an extension of houses, we would lose our peace and tranquility; overlooking existing properties, therefore invading their privacy and lost of their natural light; there are plenty of boarded up houses/factories/empty offices along Hadleigh Road why are they not being used for housing?	The site has long been allocated for development – until now the expectation has been that it would be developed as a primary school but the County Council has confirmed that the site is no longer needed for this purpose. The Highway Authority has not raised safety or access objections to the allocation. Although some of the open space would be lost, an area would be retained for children's play and informal recreation. It is also close to Chantry Park which offers extensive opportunities for recreation. Detailed traffic and drainage issues would be taken into account through the detailed planning of the development at planning application stage. The allocation establishes the principle of residential use on the site.
5631	Proposed Submission Site Allocations and Policies	IP031 - Burrell Road	Sophie Watson [1095]	I wish to register an objection to the planning application to build 20 houses on the site.  It will lead to an increase in traffic whilst at the same time reducing the amount of parking available. Parking is already difficult in the area and the loss of the car park coupled with the parking needs of a whole new housing development will make it almost impossible.  The adjacent conservation area is likely to be put at risk.  A new development will be out of character in a part of the road that comprises older buildings.	Suffolk County Council have not identified any transport constraints (see Appendix to their response). Any potential impact on the Conservation Area would be considered under policy DM8.
5647	Proposed Submission Site Allocations and Policies	IP005 - Former Tooks Bakery, Old Norwich Road	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5648	Proposed Submission Site Allocations and Policies	IP029 - Land Opposite 674-734 Bramford Road	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5649	Proposed Submission Site Allocations and Policies	IP032 - King George V Field, Old Norwich Road	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5650	Proposed Submission Site Allocations and Policies	IP033 - Land at Bramford Road (Stocks site)	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5651	Proposed Submission Site Allocations and Policies	IP059a - Elton Park Industrial Estate, Hadleigh Road	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.

5652	Proposed Submission Site Allocations and Policies	IP061 - Former School Site, Lavenham Road	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5662	Proposed Submission Site Allocations and Policies	IP105 - Depot, Beaconsfield Road	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5663	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5667	Proposed Submission Site Allocations and Policies	IP165 - Eastway Business Park, Europa Way	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5669	Proposed Submission Site Allocations and Policies	SP2 Land Allocated for housing	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5672	Proposed Submission Site Allocations and Policies	IP221 - Flying Horse PH, 4 Waterford Road	Ministry of Defence (Louise Dale) [1057]	Sites IP005, IP029, IP032, IP033, IP059a, IP061, IP105, IP140a and b, IP165, IP175, IP221, IP265 and IP261. These referenced sites fall within the 91.4m height consultation zone surrounding Wattisham airfield. Therefore, any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office.	The Council has proposed through its Pre-Submission Additional Modifications to add reference to the height consultation zone.
5701	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr George W Bates [1359]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5702	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	N/A Sarah Haig [1358]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5703	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr Michael Barker [1271]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5740	Proposed Submission Site Allocations and Policies	SP8 Orwell Country Park Extension	Mr Mick Wright [254]	Object to a visitors centre because it will require parking and a new access; it will bring people and dogs close to the SPA and increase pressure on it. IBC has not adequately managed the intertidal area to date; the site is already an saturation point for public recreation; cars via Gainsborough Lane or Bridge Wood would pose a danger to people and impair the local ambience; the centre would not benefit local people; a centre would attract vandalism; the infrastructure and habitat management of the park have been neglected. The park needs resources to warden and manage it properly.	The visitor centre is subject to a feasibility study and impact assessment on the SPA and therefore it is not certain at this stage that it will proceed. These assessments would provide the mechanism to explore and resolve potential impacts as described.
5761	Proposed Submission Site Allocations and Policies	IP116 - St Clement's Hospital Grounds	Mrs Marian Harvey [965]	Site has injunction on it to prevent any other use other than for mental health.	The site now has planning permission for residential development.
5784	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	S G and G P A Morgans [1872]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5785	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	N/a Occupier [1886]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5786	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	N/a Occupier [1885]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5787	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr David Springer [1884]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5788	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	P Woods [1988]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5789	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr Randal Fisk [1882]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.



5790	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Doreen V Dewhurst [1881]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5791	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	M Barter [1880]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5792	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	T Barter [1879]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5793	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr Stephen Cornish [1878]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5794	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr David Craig [1877]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5795	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	Mr Ray F Marshall [1876]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5796	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	N/a Occupier [1875]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5797	Proposed Submission Site Allocations and Policies	IP140 - Land North of Whitton Lane	M C Devereux [1874]	Object to the allocation of this greenfield site. There are considerable 'brown field' sites standing idle e.g. the sugar beet factory in Sproughton, Hadleigh Road Industrial site, etc. Power lines and a gas pipeline cross the site. Development would have a significant visual impact on the area. There is already congestion so significant new infrastructure would be needed. Development would impact on wildlife and protected species including badgers and slow worms, pollute the air and land, harm Whitton conservation area and destroy pathways. The land has significant drainage issues and includes medieval hedgerows. Claydon and Whitton will lose their identity.	The Government's National Planning Policy Framework states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21 <sup>st</sup> Century' (paragraph 20). This site would make a contribution to the economic growth of Ipswich. The constraints affecting the site are acknowledged through the site sheet and would need to be taken into account carefully in planning development.
5825	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	Mr John Summers [322]	Access is limited and not suitable for the volume of traffic development would create, the hockey pitch has been well used and we should not reduce community facilities.	The Highway Authority has not objected to the access. The site sheet contains reference to the need for consider alternative provision or enhancements to facilities elsewhere to replace the hockey pitch.
5826	Proposed Submission Site Allocations and Policies	IP256 - Artificial hockey pitch, Ipswich Sports Club	Mrs Jennifer Summers [1425]	The access is limited and not suitable for the volume of traffic the development would create, the hockey pitch is a well used community facility.	The Highway Authority has not objected to the access. The site sheet contains reference to the need for consider alternative provision or enhancements to facilities elsewhere to replace the hockey pitch.
24213	Proposed Submission Site Allocations and Policies	IP067 - Former British Energy Site	EDF Energy Plc (Miss Nicola Forster) [248]	Pleased that the site has been allocated for development. Housing could be accommodated in the northern part with employment on the southern part and a buffer in the middle. The NPPF states that planning policies should avoid long term protection of allocated employment sites where there is no reasonable prospect of the site being used for that purpose. It is not feasible to allocate the site for 100% employment. There has been previous interest from residential developers. The site can be configured to offset impacts of the water treatment works. The site boundary should reflect land ownership arrangements.	The allocation for non-residential use reflects Anglian Water's request for a cordon sanitaire of 400m around a 'water recycling centre' (CDL reference PSCD26).
<b>SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DPD PRE-SUBMISSION MAIN MODIFICATIONS</b>					
24224	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	36 - SP2 Land allocated for Housing (and policies map)	Historic England (Mr Tom Gilbert-Woodridge) [243]	IP011a: Lower Orwell Street While we do not object to the principle of this site being developed, the site sheet is not effective with regards to archaeological considerations, particularly with regards to the scheduled monument. The extent of archaeological potential within this site and the wider area is not fully understood and there could be nationally important archaeology within the site where development may be constrained. Furthermore, while the site sheet refers to the adjoining conservation area and listed building, there is no explanation of the implications for development in terms of these heritage assets.	Amendments have been proposed to the site sheet to address HE's concerns. Please refer to the Statement of Common Ground between IBC, HE and Suffolk County Council Archaeology Service submitted with the Council's submission to Matter 8.
24225	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	36 - SP2 Land allocated for Housing (and policies map)	Historic England (Mr Tom Gilbert-Woodridge) [243]	*IP132: Former St Peter's Warehouse site, 4 Bridge Street While we do not object to the principle of this site being developed, we have concerns with the site sheet. While it refers to the Central Conservation Area and the listed building at 4 College Street, it does not mention the Wet Dock Conservation Area, the listed church or the listed and scheduled Wolsey's Gate. There is also no recognition of non-designated buildings within the site that have heritage interest. Furthermore, there is no explanation of the implications for development in terms of these heritage assets.	Amendments have been proposed to the site sheet to address HE's concerns. The Council is producing a Statement of Common Ground which it is anticipated will be signed shortly.
24226	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	36 - SP2 Land allocated for Housing (and policies map)	Martin Robeson & Partners Ltd (Mr Richard Robeson) [984]	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD. In the event the Council disagrees, full consideration must be given to allocating the site for a mix of uses, including substantial new retail floorspace. Otherwise the allocation will fail to meet development needs and the Council's own retail objectives.	The Council advances that the previous planning permission (IP/08/00953/FUL) has now lapsed, with no evidence having been submitted verifying that the previously approved scheme has lawfully commenced. IP040 Civic Centre Area / Civic Drive (the 'Westgate' site), which is a sequentially preferable site, is allocated to meet the need for retail floorspace through the Local Plan. Therefore, it would be unrealistic to consider the allocation of further retail floorspace at IP047, which is an out of centre site.
24227	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	37 - SP3 Land with planning permission or awaiting Section 106 (and policies map)	Martin Robeson & Partners Ltd (Mr Richard Robeson) [984]	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD.	The Council advances that the previous planning permission (IP/08/00953/FUL) has now lapsed, with no evidence having been submitted verifying that the previously approved scheme has lawfully commenced.

24228	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	38 - SP5 Land allocated for employment use	Martin Robeson & Partners Ltd (Mr Richard Robeson) [984]	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD. In the event the Council disagrees, full consideration must be given to allocating the site for a mix of uses, including substantial new retail floorspace. Otherwise the allocation will fail to meet development needs and the Council's own retail objectives.	The Council advances that the previous planning permission (IP/08/00953/FUL) has now lapsed, with no evidence having been submitted verifying that the previously approved scheme has lawfully commenced. IP040 Civic Centre Area / Civic Drive (the 'Westgate' site), which is a sequentially preferable site, is allocated to meet the need for retail floorspace through the Local Plan. Therefore, it would be unrealistic to consider the allocation of further retail floorspace at IP047, which is an out of centre site.
24229	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	39 - SP6 Land allocated and protected as open space	Martin Robeson & Partners Ltd (Mr Richard Robeson) [984]	IP047 Land at Commercial Road should continue to be identified as a commitment under Policy SP3 and should not be allocated under Policies SP2, SP5 and SP6. It benefits from planning permission for a mixed-use scheme that has been implemented. Re-identifying the site as an allocation is inconsistent with its treatment in previous versions of the Site Allocations DPD. In the event the Council disagrees, full consideration must be given to allocating the site for a mix of uses, including substantial new retail floorspace. Otherwise the allocation will fail to meet development needs and the Council's own retail objectives.	The Council advances that the previous planning permission (IP/08/00953/FUL) has now lapsed, with no evidence having been submitted verifying that the previously approved scheme has lawfully commenced. IP040 Civic Centre Area / Civic Drive (the 'Westgate' site), which is a sequentially preferable site, is allocated to meet the need for retail floorspace through the Local Plan. Therefore, it would be unrealistic to consider the allocation of further retail floorspace at IP047, which is an out of centre site.
24240	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	36 - SP2 Land allocated for Housing (and policies map)	Anglian Water (Mr Stewart Patience) [2049]	It is noted that it is proposed to include additional housing allocation sites in Policy SP2 which formerly had the benefit of planning permission. All of the proposed sites are expected to require improvements to the existing water supply and foul sewerage networks to enable development.  Anglian Water has no objection to the principle of development on the additional housing allocations included in Policy SP2. Similarly we have no objection to the proposed increase in the number of dwellings for Site IP132 Former 'St Peters' Warehouse site.	The 'in principle' acceptance is welcomed. If the Inspector considers it appropriate, the Council would add wording to the site sheets as follows:  'The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.'
24241	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	38 - SP5 Land allocated for employment use	Anglian Water (Mr Stewart Patience) [2049]	It is noted that it is proposed to include additional employment allocation sites in Policy SP5 which formerly had the benefit of planning permission. All of the proposed sites are expected to require improvements to the existing water supply and foul sewerage networks to enable development.  Anglian Water has no objection to the principle of development on the proposed additional allocation sites.	The 'in principle' acceptance is welcomed. If the Inspector considers it appropriate, the Council would add wording to the site sheets as follows:  'The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.'
24242	Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD - Pre-Submission of Main Modifications	36 - SP2 Land allocated for Housing (and policies map)	Suffolk County Council (Mr Robert Feakes) [356]	Regarding sites moved into Policy SP2, the previous permission suggests that there is no planning obstacle to their delivery. However, as the sites come forward they will still require robust assessment in terms of the impacts on SCC responsibilities, e.g. transport, education and archaeological assessment. An appendix to this letter sets out indicative infrastructure costs, with caveats, to help developers and landowners understand some of the costs which may accompany development. Site IP047 will be expected to contribute towards significant off-site highway mitigation, to be determined through a Transport Assessment, due to its scale, location and the proposed uses.	The absence of planning obstacles is noted. If the Inspector considers it appropriate, the Council would add wording to the site sheet for site IP047 as follows:  'A transport assessment will be needed for this site due to its scale, location and the proposed uses, and it may identify the need to contribute towards significant off-site highway mitigation, depending on the detail of the scheme.'
<b>SUPPORTING DOCUMENTS PROPOSED SUBMISSION STAGE (REGULATION 19)</b>					
5480	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Appendix B - Baseline Data	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The best available data has not been used. More recent data on air quality, average weekly wages, sports/open space provision, population and employment is available. Data showing changes in the number of jobs over the years should be included. The most recent DCLG, ONS and EEFM forecasts should be included. The Trend Migration scenario is flawed.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5481	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.3	Northern Fringe Protection Group (Mr Brian Samuel) [976]	SA should assess effects of 13,550 homes against evidence illustrating 10,434 are needed. SA should consider effects of multiple starts at the Garden Suburb. Conclusions of CBRE traffic assessment should be considered. SA should assess implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling. The effect on redevelopment through removal of the brownfield land target and multiple starts at the Garden Suburb should be assessed.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5483	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	Northern Fringe Protection Group (Mr Brian Samuel) [976]	We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5484	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Appendix C - Consultation Comments	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5485	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Table 3-2 fails to use the most recent baseline data. Suggested improvements to the objectives and indicators in Table 3-3 have been ignored.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5486	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.1	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Placed that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5494	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.1 The Vision	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5495	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.4	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA needs to take account of the outputs from the Viability Testing for Ipswich Borough Council report which questions the viability of office, industrial and warehouse development. The jobs figure is based on over-estimated population growth, the SA should take this into account. The viability study challenges the viability of the Westgate site and the SA has not acknowledged this. The SA should recommend measures to improve the retail offer and deliver new jobs. The SA should assess the impact of developing the Sugar Beet Factory site on the delivery of the Core Strategy.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5496	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.7	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5498	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA underestimates the impact of Objective ER3. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).

5499	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5500	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Chapter 5: CUMMULATIVE EFFECTS	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA does not take account of the cumulative effects of Core Strategies in neighbouring authority areas regarding housing, employment, traffic/transport and air quality. There is no evidence of any strategic policy outcomes from the Ipswich Policy Area. The jobs targets of the four local authority areas within the Ipswich Policy Area are 26% higher than the total January 2015 EEFM forecast and there is a risk that the jobs targets are unrealistic.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5501	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.2	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Joint evidence base documents for the Ipswich Policy Area have not been made available. Jobs targets for the four Ipswich Policy Area authorities are 26% higher than the January 2015 EEFM forecasts and are therefore at risk of being unrealistic. Evidence needs to be provided that the jobs targets will provide sustainability benefits and that the Core Strategies of neighbouring authorities take account of the need to deliver 4,000 extra homes and that the sustainability effects have been assessed. If the jobs target is sustainable why do jobs and homes need to be provided in other authority areas.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5502	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.6	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5503	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.7	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5504	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.2	Northern Fringe Protection Group (Mr Brian Samuel) [976]	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5505	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.4	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5506	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.6	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modeling needs to be updated.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5507	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.7	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5508	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.8	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5594	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Chapter 5: CUMMULATIVE EFFECTS	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Likely predicted Climatic Change and adverse climatic weather impacts are insufficiently addressed with insufficient work on Compound and Cumulative Impacts likely, especially from the Suffolk Coastal District growth and expansion plans. A Joint Environmental Impact Assessment of the Core Strategy is needed for the whole of the Ipswich Policy Area. An isolated EIA on the Northern Fringe would provide no necessary safeguards for public health. Hyder's SA does not address the issues we suggest. (see Appendix E [of full submission] - SOCS 2 Sept 2014 SA Scoping Update Consultation).	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5597	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.3	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SA is not fit for purpose. The adopted CS allows a phased approach to development of the Northern Fringe/IGS and its SA judged multiple starts as unsustainable. The revised CS now allows multi-site development across the NF. A detailed examination of the implications must be included in the new SA and a full critique of the rationale behind the proposed changes. With multiple starts, if one developer hits financial problems, the added burden on remaining developers may make their operation unviable and halt delivery. This would blight the land. What contingency is there if market forces impact on infrastructure delivery?	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5609	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCS commented previously (September 2014) in response to IBC's updated SA scoping consultation letter. SOCS feel the responses given to key issues in the letter sent do not address these key issues [the need to incorporate an updated evidence base and give more detailed consideration to alternative spatial options] sufficiently. SOCS reserve the right to continue to question the 'evidence base'.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5610	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Appendix B - Baseline Data	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Regarding Air Quality and air Pollution impacts, the SA is totally lacking in capacity to reflect the current situation regarding lack of resource; eg lack of data and continuous monitoring within Ipswich from traffic, lack of particulate impacts; lack of progress in responding to emerging health impacts from Air pollution; lack of work and remit within the SA for Cumulative and compound impacts for Ipswich from multiple sources of air pollution ie Industrial, biomass, clinical and traffic and also from the crematorium. Also from "chem trails" from overhead aircraft. All in combination from impacts from Europe impacting Ipswich adversely.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5611	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.4	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCS argued [previously] that IBC's Core Strategy was unsustainable as it was based on unrealistic job targets. The previous SA failed to recognise these concerns. Evidence now shows that the jobs target was unsustainable and the original SA incorrectly assessed the CS as sustainable. A more evidence-based approach to SA is required. We are disappointed that IBC has ditched the employment-led strategy in favour of a housing-led approach. There has been no assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy. The SA needs to consider the implications of this key change.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).

5612	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.2	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the new SA. This can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work. This approach is required under the Duty to Co-operate.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5613	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.3	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The adopted CS allows for a phased approach to development of the NF. Its SA judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the NF without locational restrictions. A detailed examination of the implications of this change must be included in the new SA and a full critique of the rationale. Multiple starts may pose the risk that if a developer/landowner hits financial problems, the added burden [of infrastructure provision] falls on remaining landowners/developers, making their operation unviable and halting delivery, resulting in blight. Grampian Conditions are not mentioned within the Scoping report.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5620	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	Natural England (Mr John Jackson) [1413]	Natural England is reasonably satisfied that the Sustainability Appraisal considers the impacts of the Core Strategy and Policies on relevant aspects of the environment within our remit, including biodiversity and geology, landscape, green infrastructure and soils. We particularly welcome SA objectives to protect and enhance designated sites, including SSSIs, SACs, SPAs and Ramsar sites, in addition to locally designated and non-designated areas of biodiversity. However, we would advise that the SA should cross-reference with the findings and recommendations of the Appropriate Assessment which identifies potential recreational disturbance effects on European sites and measures to mitigate these.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5725	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5726	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Appendix C - Consultation Comments	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	Comments received against earlier Sustainability Appraisal reports were considered in taking the Sustainability Appraisal forward. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5727	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.1	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Endorse NFPG points. Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5728	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.1 The Vision	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5729	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.7	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5730	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA underestimates the impact of Objective ERS. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5731	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5732	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.6	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5733	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.3 Core Strategy Policies, 4.3.7	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5734	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.2	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5735	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.4	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5736	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.6	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modelling needs to be updated.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).

5737	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.7	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5738	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	4.4 Development Management Policies, 4.4.8	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
24075	Strategic Environmental Assessment and Sustainability Appraisal - Proposed Submission Core Strategy and Policies DPD	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The manner of "last minute", poorly drafted "revisions" to the Executive paper on the 15th October 2013 on CS10 were unacceptable, and in breach of protocols and SCI. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the public interest. The revisions make a fundamental change in direction that has "seriously undesirable unintended consequences" which should be properly referenced, appraised and evaluated within the SA. The CS10 changes are not properly referenced nor track-changed within the SASR.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5509	Strategic Environmental Assessment and Sustainability Appraisal - Site Allocations and Policies	4.3 Appraisal of Site Allocations	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The viability of the allocation of the Westgate site for Retail has been questioned by Ipswich Central and the alternative options proposed by Ipswich Central for Retail sites need to be considered in the SA of the Site Allocations accordingly.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5621	Strategic Environmental Assessment and Sustainability Appraisal - Site Allocations and Policies	Chapter 4: APPRAISAL OF THE SITE ALLOCATIONS DPD	Natural England (Mr John Jackson) [1413]	Natural England is reasonably satisfied that the SA considers the impacts of the Core Strategy and Policies (sic) on relevant aspects of the environment within our remit, including biodiversity and geology, landscape, green infrastructure and soils. We particularly welcome SA objectives to protect and enhance designated sites, including SSSIs, SACs, SPAs and Ramsar sites, in addition to locally designated and non-designated areas of biodiversity. However, we would advise that the SA should cross-reference with the findings and recommendations of the AA which identifies potential recreational disturbance effects on European sites, and measures to mitigate these.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
5739	Strategic Environmental Assessment and Sustainability Appraisal - Site Allocations and Policies	4.3 Appraisal of Site Allocations	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCs endorse the Northern Fringe Protection Group's points. The viability of the allocation of the Westgate site for Retail has been questioned by Ipswich Central and the alternative options proposed by Ipswich Central for Retail sites need to be considered in the SA of the Site Allocations accordingly.	Comments on the Sustainability Appraisal have been addressed through the Sustainability Appraisal process. Please refer to Appendix C of the SA Reports (CDL references SUCD09 and SUCD10).
<b>SUPPORTING DOCUMENTS PRE-SUBMISSION MAIN MODIFICATIONS STAGE</b>					
24257	Supporting Consultation Documents	Core Strategy SA Report Addendum ISSUED 07.10.15 (PDF)	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Issues raised previously haven't been addressed. The SA represents an optimistic view. For example it assumes 15% modal shift from cars to more sustainable transport. The impact on the town centre of the Council's focus on delivering the sugar beet site should be assessed. It does not assess the potential impacts of the garden suburb development halting midway. How can the SA make meaningful conclusions in light of incomplete and missing data? It should identify negative effects on heritage in relation to Red House Park. Not surprised by conclusions that there are no changes to significant effects or mitigation.	Comments raised at earlier stages in the SA process have been addressed as set out in Appendix C of the SA Reports (CDL references SUCD09 and SUCD10). The SA assesses the policies, not the affects of not achieving the policies. Therefore the garden suburb development and the 15% modal shift are assessed against the SA objectives. The sugar beet site is an existing employment allocation in Babergh district and is considered in the assessment of cumulative effects (chapter 5 of the SA Report - SUCD09). The local listing at Red House Farm applies to the farm buildings only and the grounds / parklands themselves are not recognised or designated in any way. However, the Garden Suburb SPD refers to the former Red House Park country estate and contains guidance for integrating the remaining trees into the layout and open space of the residential development.
24258	Supporting Consultation Documents	Core Strategy SA Report Addendum ISSUED 07.10.15 (PDF)	Save Our Country Spaces (Mrs Barbara Robinson) [978]	The SA quite rightly highlights the lack of information and uncertainty in assess the effects on traffic, air quality and climate change of circa 4,000 homes identified in the Core Strategy to be built in association with neighbouring local authorities and exposes a hole in the Core Strategy which needs to be rectified at this review.	To meet the housing need which cannot be met in Ipswich Borough the Council will work with neighbouring authorities and this work will involve sustainability appraisal.
24262	Supporting Consultation Documents	Addendum - Core Strategy Modifications Habitats Regulation Assessment (Sept 2015)	Natural England (Alison Collins) [2048]	As mentioned in relation to CS17/new 8.183, the wording does not give us confidence that the mitigation measures identified in the HRA will be delivered. To satisfy the Habitats Regulations, we would like to see a commitment by the Council in the policy to having an overarching mitigation strategy in place, ideally prior to the adoption of the plan. If this timescale is not practical, there should be a commitment to deliver a strategy by a specified date and an approach to determine what measures are needed in the interim. The strategy will need to include details of delivery mechanisms.	The statement of common ground between Natural England and Ipswich Borough Council, which was attached to the Council's response in relation to Matter 1, explains that the Council and Natural England would support the inclusion of text as follows: 'The Council will produce a Recreational Avoidance and Mitigation Strategy by March 2017 which will specify the measures required and how these will be delivered.'
24265	Supporting Consultation Documents	Addendum - Site Allocations and AAP Modifications Habitats Regulation Assessment (Sept 2015)	Natural England (Alison Collins) [2048]	We would like to see the final version of the Orwell County Park visitor survey, as the summary of the results presented in section 2.4 includes insufficient evidence for us to reach the conclusions presented in the HRA. We welcome the acknowledgement that appropriate management measures (section 2.4.9) are required to enable a conclusion of no adverse effect on the integrity of the SPA resulting from the proposed extension to the Country Park. To satisfy the Habitats Regulations, appropriate management measures must be referenced and included in the proposed overarching mitigation strategy. Also wish to discuss the England Coast Path.	This response has been addressed through the Statement of Common Ground between Natural England and Ipswich Borough Council, which is attached to the Council's statement in relation to Matter 1.1 of the Local Plan Examination.
24300	Supporting Consultation Documents	Core Strategy SA Report Addendum ISSUED 07.10.15 (PDF)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Issues raised previously haven't been addressed. The SA represents an optimistic view. For example it assumes 15% modal shift from cars to more sustainable transport. The impact on the town centre of the Council's focus on delivering the sugar beet site should be assessed. It does not assess the potential impacts of the garden suburb development halting midway. Not surprised by conclusions that there are no changes to significant effects or mitigation.	Comments raised at earlier stages in the SA process have been addressed as set out in Appendix C of the SA Reports (CDL references SUCD09 and SUCD10). The SA assesses the policies, not the affects of not achieving the policies. Therefore the garden suburb development and the 15% modal shift are assessed against the SA objectives. The sugar beet site is an existing employment allocation in Babergh district and is considered in the assessment of cumulative effects (chapter 5 of the SA Report - SUCD09). The local listing at Red House Farm applies to the farm buildings only and the grounds / parklands themselves are not recognised or designated in any way. However, the Garden Suburb SPD refers to the former Red House Park country estate and contains guidance for integrating the remaining trees into the layout and open space of the residential development.
24301	Supporting Consultation Documents	Core Strategy SA Report Addendum ISSUED 07.10.15 (PDF)	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The SA quite rightly highlights the lack of information and uncertainty in assess the effects on traffic, air quality and climate change of circa 4,000 homes identified in the Core Strategy to be built in association with neighbouring local authorities and exposes a hole in the Core Strategy which needs to be rectified at this review.	To meet the housing need which cannot be met in Ipswich Borough the Council will work with neighbouring authorities and this work will involve sustainability appraisal.
5294	Supporting Documents and PDFs for download	Plan 2 Flood Risk	Suffolk County Council (Mr Robert Feakes) [356]	The Strategic Flood Risk Assessment appears appropriate. Additional comments are provided in relation to the surface water management implications of the Site Allocations document.	Noted. The site allocations comments are logged against the relevant allocations.
5342	Supporting Documents and PDFs for download	Ipswich Local Plan Policies Map Nov 2014 (Amended 07/01/2015)	The Kesgrave Covenant Ltd (Mr Crispin Rope) [1439]	Whilst we accept that meeting the full housing requirement is highly likely to necessitate joint working with neighbouring areas, it is incumbent on Ipswich Borough Council to make best use of land within its own boundary first before it relies on assistance from others. The evidence base, in the form of the SHLAA, shows that it has not done that, because the SHLAA identifies additional opportunities within the Borough boundary, including my client's land, which has previously been tested through and found to be suitable for housing.	The Council's response to Matter 4b explains how the Council has considered other potential opportunities to provide land for housing in the Borough, including the land referred to in this response.
5398	Supporting Documents and PDFs for download	Local Plan IP-One Policies Map Nov 2014 (Amended 07/01/2015)	Applekirk Properties Ltd (Teresa Cook) [1452]	Applekirk Properties Ltd objects to the IP-One Area Inset to the Local Plan Policies Map as the boundary indicated for the River and Princes Street Corridor Opportunity Area is not justified as it is not consistent with the boundary shown in the Part C of the Site Allocations Plan.	The IP-One Inset map was amended in September 2015, please see SUCD08.
5433	Supporting Documents and PDFs for download	Ipswich Local Plan Policies Map Nov 2014 (Amended 07/01/2015)	Boyer Planning (Mr Matt Clarke) [293]	The East of England Co-operative Society supports the definition of this boundary insofar as it relates to the Rosehill Centre and associated land that it owns. It is considered that this represents a broadly logical reflection of the recent consent (IP/14/0080/FUL) and the valuable role that all of this land plays in supporting the District Centre in line with policies directing retail uses to such centres.	This support is welcomed.
5482	Supporting Documents and PDFs for download	Proposed Submission Core Strategy - Appropriate Assessment	Northern Fringe Protection Group (Mr Brian Samuel) [976]	The Appropriate Assessment ignores the change in Table 8B which states that completion of initial works at the Country Park is dependent on the occupation of 500 dwellings at Henley Gate. If fewer houses are developed or Henley Gate does not come forward in a timely manner there is no mechanism to secure delivery of the Country Park. The Habitats Regulations Assessment submitted for the CBRE planning application states that the Country Park should be in place in advance of occupation of the first dwelling.	Table 8B contains indicative triggers. More details as to how infrastructure will be funded and delivered will be set out within an Infrastructure Delivery Plan which would be considered alongside planning applications and used to secure the necessary contributions at the appropriate points in the development.
5618	Supporting Documents and PDFs for download	Proposed Submission Core Strategy - Appropriate Assessment	Natural England (Mr John Jackson) [1413]	Further to our earlier comments, we are satisfied that the Appropriate Assessment for the Core Strategy now addresses our concerns in relation to increases in visitors to Orwell Country Park and Pond Hall Farm. IBC has also committed to carrying out a study into visitor use and bird disturbance around Bridge Wood and Pond Hall, which will provide a baseline and will be used to inform visitor management measures at the park. Where necessary we would expect individual developments to be subject to project level Habitats Regulations Assessment linking back to elements of mitigation identified at the strategic level.	The Visitor Survey has now been published (CDL reference ICD82) and Natural England have confirmed in their letter to the Council dated 26th February 2016 that they support the methodology, interpretation of the results and the conclusions drawn (the letter is attached to Natural England's response to Matter 1.1 as part of the stage 1 hearings of the Local Plan Examination).

5724	Supporting Documents and PDFs for download	Proposed Submission Core Strategy - Appropriate Assessment	Save Our Country Spaces (Mrs Barbara Robinson) [978]	SOCS endorse the Northern Fringe Protection Group's points. The Appropriate Assessment ignores the change in Table 8B which states that completion of initial works at the Country Park is dependent on the occupation of 500 dwellings at Henley Gate. If fewer houses are developed or Henley Gate does not come forward in a timely manner there is no mechanism to secure delivery of the Country Park. The Habitats Regulations Assessment submitted for the CBRE planning application states that the Country Park should be in place in advance of occupation of the first dwelling.	Table 8B contains indicative triggers. More details as to how infrastructure will be funded and delivered will be set out within an Infrastructure Delivery Plan which would be considered alongside planning applications and used to secure the necessary contributions at the appropriate points in the development.
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