

Ipswich Local Development Framework

Analysis of Preferred Options comments received between 14th January and 20th March 2008

Guidance notes for the tables

1. The tables are arranged in document order: Table 1 Core Strategy; Table 2: IP-One Area Action Plan; Table 3: Site Allocations and Policies: and Table 4: Sustainability Appraisal
2. The comments relating to each document are listed in chapter and policy area order.
3. The tables indicate the number of objectors and supporters and broadly who they were. Organisations are named, as are private individuals where numbers allow. Where large numbers of individuals have commented on an item they are listed as, for example, '50 individuals'.
4. The key points that objectors have made are summarised very briefly – please refer to the online LDF database for full comments.
5. The comments of the key specific consultation bodies such as the Environment Agency are ascribed to them, but the remainder are listed as general comments. In some cases more than one person or organisation may have made the same comment, but it would only be listed once.
6. Objections are the focus because they are the issues the Council will need to address in preparing submission draft documents.
7. Comments that may be supporting in principle but disagreeing with detail are listed as objections.
8. Supporting comments have not been reported other than where they were the only comment made on a chapter or topic, were of particular note, or where several people make the same point.
9. Abbreviations are used to keep the report as short as possible and are identified in footnotes where necessary. They include the following:
 - a. GO East Government Office for the East of England;
 - b. EA Environment Agency, EH English Heritage, NE Natural England, HA Highways Agency, SE Sport England
 - c. EERA East of England Regional Assembly, EEDA East of England Development Agency;
 - d. SCC Suffolk County Council
 - e. RSL Registered Social Landlord
 - f. RSPB Royal Society for the Protection of Birds
 - g. SHMA Strategic Housing Market Assessment; SHLAA Strategic Housing Land Availability Assessment;
 - h. PPS Planning Policy Statement; MPS Minerals planning Statement.

Table 1: Preferred Options Analysis – Core Strategy and Policies

Chapter	Policy Area / page / para.	No. of objections	No. of supports	Objector profile	Supporter profile	Key objection issues raised
Whole doc	-	26	0	Ipswich Society, Suffolk Preservation Society, EEDA ¹ , GO East ² , EERA ³ , RSPB ⁴ , Bellway Homes, Cycle Ipswich, Mersea Homes, Home Builders' Federation, Highways Agency, Environment Agency, L Adkimir, H Cooper, B Robinson, J Norman, A M Hunter	-	<ul style="list-style-type: none"> • Overdevelopment within existing built up area – should consider eco-development of Northern Fringe area. • Urgently need sustainable multi-modal traffic management schemes implemented • Concern about standards of built design – need to review town centre streetscape • Should not expand retail area but improve existing through the BID • Multiple cross references with other DPDs make it complicated to read (EERA) • It should take account of the Regional Economic Strategy (EEDA) • There is not enough evidence of cross boundary working to deal with the implications of developing 20,000 homes within the Ipswich Policy Area (EERA) • Need to see detailed policy wordings as there is insufficient detail on what they will contain (GO East & others) • Does not address the Ipswich Major Transport Scheme or the Ipswich-Peterborough freight W10 gauge clearance scheme (EERA) • No reference made to waste management and minimisation (EERA) • Need more clarity on how other DPDs will fit with this one GO East) • Need to assess whether an Appropriate Assessment is needed and carry it out where required (GO East, RSPB) <p>Cont'd ...</p>

¹ East of England Development Agency

² Government Office for the East of England

³ East of England Regional Assembly

⁴ Royal Society for the Protection of Birds

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Whole doc cont'd						<ul style="list-style-type: none"> • The document needs a more clear structure that complies with Planning Advisory Service advice (GO East) • The submission DPD should be shorter with less explanatory text (GO East) • The Council must identify which saved policies will be replaced by the DPD (GO East) • The draft spatial vision is not spatially specific and does not explain where growth will be focused (GO East) • The evidence base is incomplete and the community should have a chance to comment on it • The DPD has not been prepared with adequate reference to national policy in some crucial areas • The LDF exhibits procedural weaknesses in how the sustainability appraisal has informed policy • It is not clear that a sequential approach has been taken to flood risk • The DPD does not comply with Regional Spatial Strategy especially in relation to transport • Unless the increase in traffic arising from growth is managed, trunk roads may suffer from increased congestion by 2021 (HA) • Should slow down the rate of building to ensure new homes already built get occupied and ease pressure on services • Development must be phased so that no extra pressures are placed on water resources or wastewater capacities that could lead to harmful impacts on water bodies (EA) • Council could require developers to submit a sustainability strategy with each major development application (EA) • Object to growth on the scale proposed and notions of a dynamic and vibrant Ipswich <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Whole doc cont'd						<ul style="list-style-type: none"> • Environmental and sustainability issues have been given insufficient regard • The vision fails to observe that the town centre, employment and environment are declining – it should seek to increase social interaction between people through economic, cultural, educational, leisure, sporting and religious activities • Object to development being focused in central Ipswich as it will lead to a strong sense of town cramming – open spaces and pocket parks are needed in the centre & Waterfront
1 Introduction	1.10 – 1.14	1	0	Home Builders' Federation		<ul style="list-style-type: none"> • Limited regard can be had to the DPD because it has not yet been examined and because the whole document will be examined, not just sections that have been objected to.
2 New Planning System	-	2	0	Home Builders' Federation (both objections)		<ul style="list-style-type: none"> • DPD has not taken national planning policy sufficiently into account • Brownfield sites identified for development must be readily and realistically available. DPD should provide for a range of sites, greenfield and brownfield and a range of housing types • Demands on developers must take account of site viability • DPD should not replicate the Code for Sustainable Homes • The document must be based on a sound evidence base including a Strategic Housing Market Assessment, and a housing trajectory that demonstrates when housing sites will be delivered

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3 Regional Spatial Strategy	-	5	0	EERA, GO East, Cycle Ipswich, Home Builders' Federation		<ul style="list-style-type: none"> • Update references to RSS which is now published (EERA) • Concern over non-conformity caused by lack of demonstration of joint working (EERA) • Core Strategy does not clearly articulate the spatial strategy for the district or provide certainty about where future growth will be accommodated (GO East) • No overall spatial approach that brings together housing, employment and retail development (GO East) • Transport policies do not conform with RSS and are scattered throughout the 3 DPDs – the Core Strategy should have a transport section that reflects RSS • A 15 year supply of housing land must be provided, taking it beyond the 2021 date mentioned and affordable housing targets should reflect local need as well as RSS
5 Ipswich LDF	Para 5.2	0	1	-	Sport England	<ul style="list-style-type: none"> • Support approach to planning obligations set out in 5.2 and preparation of SPD on the topic which would include open space
6 Ipswich the Place	Para 6.7 and others	3	0	English Heritage, GeoSuffolk, M Brain		<ul style="list-style-type: none"> • Need more focus on the weaknesses of Ipswich which need to be remedied – vulnerable strategic transport links and poor retail offer • Concern about loss of character and distinctiveness on the Waterfront (para 6.7) (EH) • Urgent need to address highway issues – parking in new developments, traffic generation and severance of public realm • The section makes no reference to Ipswich biodiversity and geodiversity assets as required by PPS9

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
7 Vision and Objectives	7.7 to 7.33	32	20	Ipswich Society, Natural England, Sport England, Suffolk County Council, EEDA, EERA, GO East, English Heritage, Environment Agency, Bidwells, Ashfield Land, Prudential Pensions Ltd, Ipswich School, Shearer Property Group, Mersea Homes, Crest Nicholson, University Campus Suffolk, Home Builders' Federation, GeoSuffolk, Flagship Housing Group, M Brain, J Norman, S Pryor	Greenways Countryside Project, Natural England, University Campus Suffolk, EERA, Westerfield Parish Council, Little Bealings Parish Council, Planning Potential, Ipswich School, PRUPIM, B Reeve, C Reeve	<p><u>Vision and Guiding Principles</u></p> <ul style="list-style-type: none"> • Need more emphasis on design quality and sustainable transport. • Vision and objectives must address reducing dependency on the private car and actively improving public transport • Should articulate more fully the wider role of Ipswich as a Haven Gateway growth point & a regional gateway (EEDA) • Support, but the vision needs clarifying and rebalancing • Draft spatial vision is not spatially specific and does not explain where growth will be focused (GO East) • Vision should recognise the strong sense of place conveyed by Ipswich's built heritage (wording suggested – EH) • Vision and guiding principles should protect biodiversity and geodiversity • More emphasis is needed on climate change and flood risk matters in the guiding principles, which must then be reflected in all relevant policy areas and the growth strategy • The end date should reflect a 15 year housing land supply and so extend beyond 2021 • Development is choking Ipswich – should adopt a 'village' approach to new development converging on a strong town centre and discourage use of the car • Guiding Principle 1 – Concern that this approach could lead to loss of open space and overload sewerage system (EA). Should recognise that if some central sites are not immediately deliverable, there will be a need to bring forward greenfield sites earlier in the development plan period to maintain delivery. Should refer to the Northern Fringe area and areas accessible by public transport as a focus for development because the town centre will not be able to meet all needs, especially for a range of homes. <p>Cont' d ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
7 Vision and Objectives cont'd	7.34 to 7.62 Objectives cont'd					<ul style="list-style-type: none"> • Objective 3 – The 90% target is challenging (EA). Target is inflexible and undeliverable and should be 70% • Objective 4 – Welcome this but only subject to overcoming flood risk issues especially within IP-One (EA). It is unfeasible & unsustainable to locate all new development in the town centre, e.g. bulky goods retailing. Should refer to maintaining a hierarchy of retail centres. Should not focus development in IP-One because of flood risk constraints and uncertainty about the barrier. Should set out a dispersed approach to employment development. • Objective 5 – should refer to open space, sport and recreation facilities, to reflect their importance to the community (SE); unclear whether there is a policy dealing with culture and/or leisure (EERA); there is insufficient evidence to support identifying only one strategic employment site for the period to 2021 (the plan should allow for flexibility) • Objective 6 – include reference to improving the accessibility from the edge of town, the A12 and A14 to the station, Waterfront and town centre. Any reduction in capacity in central Ipswich may have an adverse impact on the accessibility of the town centre to shoppers. Disagree that additional road capacity is needed to reallocate road space from private vehicles to public transport, cycling and walking, and this is not in the LTP. Need to reduce traffic on the gyratory, not provide a Wet Dock Crossing. Objective should include providing a dedicated cycle & pedestrian cross town route • Objective 7 – Support, but note that the threat of flooding is from surface water runoff as well as tidal surges (EA). Unclear on the policy approach to integrated water management, sustainable drainage technologies and flood risk management <p style="text-align: right;">Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
7 Vision and Objectives cont'd	7.34 to 7.62 Objectives cont'd					<ul style="list-style-type: none"> • Objective 8 – Should acknowledge the role open space plays in conserving biodiversity (wording suggested - NE); should refer to green infrastructure as required by RSS (EERA) • Objective 9 – add reference to ageing population (wording suggested - SCC) and add a key principle that the needs of the more vulnerable are recognised in Section 106 Agreements and developments • Need an extra objective about the development of appropriate services and facilities to support an ageing population (the proportion of older people in Ipswich will increase by 36% by 2029). • Objectives need to be flexible and allow alternative strategies if practical difficulties e.g. flooding cannot be overcome • An additional objective is needed that positively addresses the town's environmental quality and character including the historic environment (EH) • The objectives do not cover industrial development outside IP-One
8 Development of the Strategy	Comments on and/or omissions from whole chapter	6	0	GO East, Cycle Ipswich, Costco, D Saunders, P M Hemingway		<ul style="list-style-type: none"> • The document includes separate policies for housing, employment and retail, however, it is unclear how these separate policies are drawn together to form an overarching spatial strategy (GO East) • Need a separate section on Transport in the Core Strategy to properly address Regional Policy T1 (Regional Transport Strategy) and cover the issues of achieving economic growth without increased growth in traffic, better journey reliability, efficient use of transport infrastructure and reduction in transport related emissions • Address Regional Policy T2 (Changing Travel Behaviour) in a convincing way – do more to promote cycling, promote bus travel and ensure that travelling into town by non-car modes is cheaper and more attractive than driving. <p>Cont'd ...</p>

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8 Development of the Strategy	Comments on and/or omissions from whole chapter Cont'd					<ul style="list-style-type: none"> • Work Section – there is no indication of how much floor space is needed to deliver 18,000 jobs • The existing road and sewerage infrastructure will not be able to accommodate the growth • Growth should not be at the expense of countryside areas on the edge of Ipswich • There is a need for dedicated cycle tracks rather than cycle lanes on roads • Car parking should be provided underground
8 Development of the Strategy	Policy Area 1 Sustainable Development	16	5	Natural England, Suffolk County Council, GO East, Ipswich Wildlife Group, Planning Potential, Bidwells, PRUPIM, Shearer Property Group, IBC Labour Group, Bellway Homes Ltd, Cycle Ipswich, Mersea Homes, Crest Nicholson, Home Builders' Federation, R & M Wand	Planning Potential, RSPB, Environment Agency	<ul style="list-style-type: none"> • Support the proposed approach but the full sustainable development agenda should be recognised in this overarching policy so reference should also be made to the need to conserve and enhance biodiversity, local character and distinctiveness (NE) • Principle is welcomed but concern about the carbon measuring approach, as PPS1 Supplement advises using national standards e.g. Code for Sustainable Homes, EcoHomes or BREEAM (SCC) • The details and implications of the proposed approach are unclear – detail and definitions are needed (GO East) • Nowhere is the requirement for district wide and site specific renewable energy targets addressed (GO East) • Policy Area 1 should be merged with Policy Area 28 (GO East) • Should include specific standards for new buildings, requiring grey water systems, very high insulation, and 'green' water heating solutions (links also to Part D of DPD) • Should include a developer checklist of sustainability requirements and include the 10% renewables requirement with something stronger (links also to Part D) • Should require developers to have a flood evacuation plan. Cont'd ...

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8 Development of the Strategy	PA 1 cont'd					<ul style="list-style-type: none"> • It is important to recognise that low carbon and flood resilient buildings can be more expensive than standard designs, and therefore on brownfield sites other developer contributions may need to be reduced • Low carbon and carbon neutral should be defined and more detail added e.g. on measuring the carbon footprint • Carbon reduction must be achieved through an achievable, viable and measurable process but the policy contains insufficient detail to assess this • It may not be possible for all developments to meet high standards of sustainability so the policy should be flexible, especially towards retail development • Does not comply with PPS1 Supplement because the policy approach is unclear and is not based on evidence e.g. of what size of development the renewables targets should be applied to • Question achievability of keeping the carbon footprint to 2004 levels • Need to distinguish between emissions reduction and climate change adaptation and address both • Query the per capita emissions figure given (para 8.22) which is 40% lower than the national average • Should include emissions reduction targets for the transport sector • Should address full range of issues including flood risk, transport, economic sustainability, and social development and lead to a spatial strategy built on this approach • Comprehensive redevelopment opportunities on larger sites are likely to provide more opportunities to reduce carbon emissions than smaller, fragmented brownfield sites in the centre <p>Cont'd ...</p>

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8 Develop ment of the Strategy	PA 1 cont'd					<ul style="list-style-type: none"> • Ipswich should not exceed the standards set out in the Code for Sustainable Homes • The Policy Area does not go far enough – adapting to a low carbon way of life will be a dominant consideration • Insufficient weight has been given to the development of sustainable transport alternatives to mitigate the inevitable rise in traffic resulting from growth. E.g. each site's proximity to walking or cycling routes should be noted. A more radical approach to transport is needed
8 Develop ment of the Strategy	Policy Area 2 Location of Develop- ment	21	14	<p>Ipswich Wildlife Group, The Ipswich Society Asda Stores Ltd, Gainsborough Retail Park Ltd, Merchant Projects Ltd, Andrew Martin Associates, Morrisons Supermarkets, Ashfield Land, Indigo Planning Ltd, Ipswich School, IBC Labour Group, Mersea Homes, Crest Nicholson, David Wilson Homes, Home Builders' Federation,</p> <p>Cont'd</p>	<p>Highways Agency, Environment Agency, Strutt & Parker, Suffolk County Council, National Grid Property Holdings Ltd, Planning Potential, PRUPIM, R Day, R J Kemp,</p>	<ul style="list-style-type: none"> • Add reference to improving green links and ensure a riverside park is provided • Stoke Park Dr should be identified as a Major District Centre • Support focus on the centre but other locations should not be ruled out for retail development especially of large format types of retail e.g. Ikea, or where development would help to achieve other objectives • Building in the Northern Fringe would remove the need to develop in Flood Risk Zones 2 & 3 • Change para 8.37 to allow flexibility towards the location of B1 business uses so as not to stifle economic development • The Morrisons supermarket at Sproughton Road should be included within the new district centre's boundary • Should extend the range of economic development that would be acceptable in out of town locations that have good public transport accessibility, to allow some flexibility • Not all types of shopping will be feasible or sustainable in the town centre, e.g. bulky goods retail uses and the strategy should recognise this in accordance with PPS6 • Promote the Northern Fringe and question the capacity of town centre sites to accommodate all development needed and provide a suitable range of housing types • Allotments should not be developed <p>Cont'd ...</p>

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8 Development of the Strategy	Policy Area 2 Location of Development Cont'd			M Brain, A Fuller, D Saunders, R G Thurtle, S Sadler, H Cooper		<ul style="list-style-type: none"> • Dispersal of development would not undermine the town centre if done selectively • PA2 should be based on a proper analysis of a robust and credible evidence base taking into account issues of sustainability, deliverability and choice – there is no evidence that it has been • Promote Northern Fringe sites B and C which could accommodate 2,700 homes and create a new neighbourhood • The town centre cannot accommodate all the development – this approach leaves a potential shortfall of 3,000 units • Seeking to maximise urban opportunities for development so as to avoid the Northern Fringe has a negative impact on the diversity and balance of land uses in the urban area and harms quality of life and sustainability • Lack of flexibility in the location of development, which should allow the early release of a strategic greenfield site to address uncertainties around the delivery of town centre sites • The approach should take account of the availability and deliverability of individual sites • The Northern Fringe should be developed if the alternative is the loss of gardens and green spaces in town • Would prefer one large scale greenfield development to several smaller ones so as to gain economies of scale for infrastructure • Over concentration of development in IP-One could cause stagnation rather than vibrancy • Support brownfield focus but should not develop on gardens or green spaces including allotments • Should not allow any development north of Tuddenham Road as it would harm the character of Ipswich • Need more homes in the town centre to bring more liveliness in the evenings • House building should be directed to out of town sites until the road infrastructure is improved, and out of the flood plain

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8 Develop ment of the Strategy	Policy Area 3 Mixed Use Develop- ment	10	3	Crest Nicholson, Planning Potential, Peacock & Smith, PRUPIM, Shearer Property Group, Bellway Homes, Spennhill Regeneration Ltd, Mersea Homes, Sainsburys Supermarkets Ltd, Applekirk Properties Ltd, Home Builders' Federation	Highways Agency, Environment Agency, Sanctuary Hereward	<ul style="list-style-type: none"> • Policy is too inflexible and should allow for major developments to be single use if this can be justified by planning policy • There must be flexibility and pragmatism in relation to the constraints of individual sites and whether uses would fulfil local needs • It may not always be viable or achievable to provide a mixed use development, sites should be assessed on their merits • The approach is too rigid – on some sites a mix may not be viable and on others more than 2 uses may be viable – so the policy should just promote mixed use where appropriate • Should provide more clarity about how applications will be assessed against this requirement • Require a stronger link between this policy approach and the approach to Orwell Retail Park
8 Develop ment of the Strategy	Policy Area 4 Protecting Our Assets	7	8	Suffolk Wildlife Trust, Planning Potential, GeoSuffolk, Robert Brett & Sons Ltd, English Heritage, D Saunders, K Matthews, A Matthews	Environment Agency, The Ipswich Society, Natural England, Suffolk County Council, EERA, Shearer Property Group Ltd, Crest Nicholson, I McKie	<ul style="list-style-type: none"> • A map should be included that shows the international, national, regional and local designated wildlife sites in accordance with PPS9 • Generally support it but want to see flexibility and pragmatism used in relation to sites that might offer regeneration opportunities or community benefits • Possible impacts of development on geodiversity should also be considered • Must address archaeology also (EH) • Should include a policy to protect the settings and inter-relationships of the historic churches and the Waterfront and town centre (EH) • MPS1 requires the plan to safeguard aggregate wharves and associated development including railheads • Must retain our natural heritage for posterity • Need a catch all policy in case important assets are not protected by other means

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8 Development of the Strategy	Policy Area 5 Urban Design	3	2	CABE, Sanctuary Hereward, Environment Agency,	EERA, English Heritage,	<ul style="list-style-type: none"> • Robust design policies should be included in all LDF documents, embedding design as a priority from strategic down to site level • Treat design as a cross cutting issue • Policy should provide hooks for design guides, site briefs and design codes • Design standards need to be flexible to accommodate the requirements for RSL⁵ schemes, e.g. Sanctuary has its own design and technical brief for new dwellings (compliant with Code level 3) • There should be an overarching policy on urban design with a supplementary planning document to provide clarity and ensure consistency
8 Development of the Strategy	Policy Area 6 Ipswich Policy Area	7	3	EEDA, EERA, The Theatres Trust, Bellway Homes, Crest Nicholson, Highways Agency, Home Builders' Federation	The Ipswich Society, Sanctuary Hereward, M Brain	<ul style="list-style-type: none"> • Should include a positive strategic policy for the IP-One Area (EEDA) • The DPD does not demonstrate that wider IPA issues have influenced the Council Strategy (EERA) • The policy area is very unclear and needs amending for clarity and transparency • Object to the lack of joint working between the authorities, to address sub-regional issues • Not producing joint DPDs with neighbours is a missed opportunity to consider the wider impact of development across boundaries • The Council must ensure that adequate long term provision for housing is made in and around Ipswich

⁵ Registered Social Landlord e.g. a Housing Association

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 7 Amount of Housing	18	2	GO East, Mersea Homes, Crest Nicholson, David Wilson Homes, The Ipswich Society, Bidwells, The Riverside Group, Ipswich school, IBC Labour Group, Bellway Homes Ltd, Home Builders' Federation, Shearer Property Group Ltd, M Brain, K Matthews, A Matthews	Strutt & Parker, Sanctuary Hereward,	<ul style="list-style-type: none"> • Question likely housing delivery and estimate a housing shortfall of 2,299 dwellings: point to the non-viability of further apartment building, rising commercial land values, and rising development costs linked to infrastructure provision • Estimates of development on previously developed land are over optimistic and more land will be needed – some Northern Fringe development should be included rather than developing every piece of back land and garden • Support inclusion of a 'slippage' amount but question where the number of 900 dwellings derives from (GO East) • Need to clarify the relationship between Policy Area 7 and 11 (GO East) • Must indicate that the Council will plan for continuous housing delivery beyond 2021 (GO East) • An allowance should not be made for the re-occupation of vacant units as this will not result in a net gain of housing units (GO East) • Should assume a 10% loss from current planning permissions, given the cooling market • Object to 10% over allocation because of uncertainty over the delivery of central sites and infrastructure, and the RSS figure being a minimum – the DPD should therefore make a greenfield allocation to deal with delivery uncertainty • The plan is too dependent on 'difficult to develop' sites and risks losing the opportunity for coordinated sustainable development at North Ipswich • Policy Area 7 must be based on robust and up to date evidence including a full assessment of deliverability, appropriateness and sustainability • In total, 3173 dwellings are subject to questionable delivery thus the DPD will not deliver the RSS housing target <p>Cont'd ...</p>

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8 Development of the Strategy	PA 7 Amount of Housing cont'd					<ul style="list-style-type: none"> • Object to the calculations of the number of units needed on new site allocations • The policy should plan for 15 years in accordance with PPS3 • There is a shortfall of about 3,000 dwellings, based on uncertainty about delivery • The policy should be informed by a strategic housing land availability assessment (SHLAA) and should not include an allowance for windfalls nor for reoccupying empty homes • Question whether IP-One can absorb so many new dwellings and still deliver the vision – would prefer to see part of Northern Fringe developed • The housing target is too high and since it is only based on forecasts a lower allocation should be planned for initially • The borough boundary needs to be extended so development can be distributed more widely across the town centre and the periphery • Ipswich infrastructure cannot cope with the scale of development • Should take time over meeting the target to allow breathing space to see how demand develops • Welcome the housing proposed but adequate provision must also be made for employment and infrastructure to meet the increased demand • There is no evidence that the sequential approach required by PPS25 Flood Risk has been considered in identifying sites to deliver this growth

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8 Development of the Strategy	Policy Area 8 Balance between Flats & Houses	15	3	Sanctuary Hereward, National Grid Property Holdings Ltd, Suffolk Housing Society, Flagship Housing Group, Ipswich School, IBC Labour Group, Bellway Homes Ltd, Spenhill Regeneration Ltd, Mersea Homes, Crest Nicholson, David Wilson Homes, Home Builders' Federation, L Akdemir, C Vint, P Stockdale, S Sadler	The Ipswich Society, Strutt & Parker, EEDA,	<ul style="list-style-type: none"> • Support flats in centre and houses across the town but the policy needs accompanying text recognising that in some circumstances the development of homes needs to be considered on a site by site basis (in relation to RSLs) • Policy must be flexible to allow individual circumstances to be taken into account; it should include the criteria in para 8.168 • The number and mix of affordable flats and houses on a site should be proportionate to the numbers on the whole site • Policy needs to be more specific about sites where affordable housing is provided under a Section 106 Agreement and achieve a balance of provision • Support the overall approach but if the focus remains on flats in central Ipswich, then parking must be provided for affordable units • The approach is unnecessarily rigid and would not contribute to mixed sustainable communities at a neighbourhood level • Why are district centres the focus if jobs, schools, health and leisure facilities are not located there? • Should base the policy on the best approach for each site • The case for building even more flats in Ipswich is unproven and should be reconsidered what is the relevance of comparison with Cambridge and Norwich? • More family housing is needed in Ipswich, not flats – even small households want family housing rather than 1 or 2 bed flats and the flats are not selling for this reason • There should not be reliance on neighbouring Councils to provide family housing • Overly simplistic and unworkable and criterion 3 is too onerous and will not guarantee a satisfactory mix • Policy should be informed by the Strategic Housing Market Assessment (SHMA) and a SHLAA <p>Cont'd ...</p>

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8 Development of the Strategy	PA 8 cont'd					<ul style="list-style-type: none"> • Para 8.168 is overly restrictive and the 3 mitigating circumstances do not mention flooding, contamination of highways • There is no evidence that the policy approach has been informed by the sequential approach required by PPS25 • There is no evidence that issues of deliverability, housing choice and diversity or policy in PPS3 have informed the approach • Policy should be based on sound evidence • There is an oversupply of flats in the Waterfront • The strategy will not provide an appropriate range of dwelling types • Para. 8.171 falsely links the trend towards smaller households to a need for smaller dwellings, whereas many such households wish to live in family sized accommodation • Accept in principle that as a crowded nation we will need to adapt to flatted living but we should look to Europe to learn how to make it more 'liveable' e.g. low rise buildings, more generous green space, and separate storage areas
8 Development of the Strategy	Policy Area 9 Density of Residential Development	10	2	English Heritage, Environment Agency, EEDA, Sanctuary Hereward, Ipswich School, IBC Labour Group, Bellway Homes Ltd, Spenhill Regeneration Ltd, Mersea Homes Home Builders' Federation, Crest Nicholson,	The Riverside Group, Flagship Housing Association	<ul style="list-style-type: none"> • Council should take a broader and more flexible approach to density and reflect site characteristics • Caution against a blanket application of densities as it may not produce the best mix – the SHMA should inform policy • The Council's preferred density range should be a guide and not applied rigidly • Should use national guidance as a benchmark and then determine each application on its merits – the suggested density bands are worryingly high and some applied in unsuitable locations that would lead to overdevelopment • The high density band would have townscape and traffic generation implications (EH) • See Issues stage comments (EA) <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	PA 9 Density of Residential Development Cont'd					<ul style="list-style-type: none"> • The accompanying text needs to be sufficiently flexible to allow for schemes that do not completely comply with policy but conform generally with PPS3 • The ranges are overly simplistic – density should be determined site by site having regard to local services accessibility, site characteristics, housing mix needed and the character of the local area • Text should be added to para 8.190 explaining that the densities will be applied with some flexibility to respond to market conditions and site issues • Proper analysis of the influence of density on the built and natural environment should inform density assumptions for new development, to avoid creating living environments that are out of human scale and are subject to social or environmental deficiencies • High density should be above 70 dwellings per ha, and medium 40 to 70 dph • Density should be based on the character of the resulting development required, not enabling a certain housing capacity to be calculated • Should not assume that recent densities achieved will continue – need to be more realistic and flexible

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 10 Previously Developed Land	6	7	Sanctuary Hereward, The Riverside Group, Ashfield Land, RSPB, Ipswich School, Gainsborough Retail Park Ltd, Mersea Homes, Crest Nicholson, M Brain,	EERA, Strutt & Parker, National Grid Property Holdings Ltd, D Saunders,	<ul style="list-style-type: none"> • Flexibility of approach is needed for affordable housing schemes meeting local need which sometimes cannot use brownfield sites because of financial considerations • Need to clarify that small pockets of unused land in residential areas count as previously developed land • DPD should give guidance on non-residential targets for development on previously developed land • Support the use of brownfield sites before greenfield but brownfield sites can be rich in invertebrate biodiversity therefore any such brownfield sites should be identified and mapped • Object to the 90% target because delivery is unproven and failure could compromise housing delivery - a trend based approach is not robust and does not take into account e.g. flood issues in Central Ipswich • The target should also apply to retail development and other high value forms of development to support regeneration, but not to employment uses • A more realistic and balanced target should be set that recognises constraints such as flood risk affecting brownfield land • Target should be 70% to provide for greater flexibility and certainty of delivery • Support the approach in principle, but question the extent of the proposed development and the logic of focusing on a target of 90%

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 11 Greenfield Land	22	9	Suffolk County Council, EERA, Sanctuary Hereward, GO East, The Kesgrave Covenant Ltd, Vincent & Goring, Ashfield Land, Campaign for Better Transport (Ipswich & Suffolk Group), Ipswich School, IBC Labour Group, Mersea Homes, Crest Nicholson, David Wilson Homes, M Brain, T J Chambers, B Page, D Saunders, S Weir, S Sadler,	Westerfield Parish Council, Little Bealings Parish Council, RSPB, B Reeve, R Day, M Gray, I McKie, C Reeve, R J Kemp,	<ul style="list-style-type: none"> • The Northern Fringe has been identified as a possible location for a new secondary school – SCC advocates a joint approach with neighbouring authorities to find the most sustainable development options • Policy should refer to green infrastructure in accordance with RSS Policy ENV1 (EERA) • Support in principle but consideration should be given to schemes that need greenfield land for economic reasons e.g. RSL developments • It is not clear what the Core Strategy's end date is or whether the Council intends to meet the PPS3 requirement to identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from adoption – the end date should be at least 2024-2025 (GO East) • The Core Strategy should identify a greenfield site in North Ipswich for development up to 2016 – it is over-reliant on brownfield sites where delivery is uncertain, many brownfield sites are in the flood plain and Ipswich needs family housing • Land between Tuddenham Rd & borough boundary should be included within a potential development at north Ipswich • Land between Humber Doucy Lane and the borough boundary may be needed if SCDC identifies land adjacent as their preferred location for strategic housing growth • Site UC257 (west of Old Norwich Rd) should be allocated for employment use – together with adjacent land in Mid Suffolk, it would deliver extended park & ride, open space & housing and could help to create 2000 jobs towards the 18,000 target • To reduce the risks associated with the accelerating change in IP-One, it would be more sensible to bring forward the development of the Northern Fringe for 3,500 dwellings as a new district, with a refocus on IP-One after 2021 <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	PA 11 Greenfield Land cont'd					<ul style="list-style-type: none"> • The approach to greenfield land does not properly consider the wider issue of meeting the need for other forms of development such as employment uses • There is no evidence that IBC has assessed employment land to meet the RSS job target – an employment land review has not been undertaken • The proper planning of North Ipswich should include provision of a frequent bus service from the initial stages of development, & cycle routes into town and other destinations • Any development of the Northern Fringe must be accompanied by proper infrastructure provision (inc roads) • Support the identification of area C for possible future development but object to the timescale – should be developed before 2021 • Support the prioritisation of brownfield land in principle but this is not appropriate where it leads to the loss of green space within the town (especially allotments), more traffic congestion, increased drainage problems, and the inability to provide sustainable community facilities • There is a need to allocate greenfield land in the northern fringe of Ipswich to meet the shortfall in dwellings (3,173), deliver a balanced housing supply and ensure housing delivery • The Council's SA suggests that many of the greenfield allocations proposed score poorly – they are less sustainable than the rejected option of the Northern Fringe which should be allocated to ensure a 15 year land supply • The Northern Fringe should never be developed and should be designated an AONB – because of landscape and agricultural value and lack of infrastructure • Several supporting comments received (see numbers and names) from respondents against the development of the Northern Fringe before 2021

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 12 Gypsy & Traveller Accommodation	4	0	Suffolk County Council, EERA, GO East, Friends, Families & Travellers		<ul style="list-style-type: none"> • Policy Area 12 does not fully address the implications of the single issue review of RSS (of the accommodation needs of Gypsies and travellers) which recommends the provision of a minimum of 15 pitches over the next 5 years • The Council is encouraged to proceed with pitch provision in line with its Gypsy & Traveller Accommodation Assessment (GTAA) in the first instance, with a minimum allocation of 3 pitches, and a long term aim to provide 15 pitches • Policy Area 12 does not reflect the requirements of C01/2006 para. 31 which requires policies to set out the criteria for the location of Gypsy and travellers sites (GO East) • It is not clear what the statement about addressing accommodation needs at an Ipswich Policy Area level means in practice (para. 8.247) (GO East) • The need for transit pitches should be addressed in the LDF (GO East) • Disagree that the need for pitches is too small to be practicably met, and that evidence of the need for transit pitches is not strong enough to warrant provision – 10 residential pitches should be provided and 8-12 transit pitches
8 Development of the Strategy	Policy Area 13 Residential Planning Gain Tariff	16	2	Greenways Countryside Project, Highways Agency, Suffolk County Council, EEDA, Sanctuary Hereward, GO East, The Riverside Group, Ipswich School, Bellway Homes, Cycle Ipswich,	Sport England, Environment Agency	<ul style="list-style-type: none"> • Support the tariff approach but object to omission of allocation for open space provision and management within it • Should clearly state the contributions may be required to mitigate development impacts affecting the trunk road (HA) • Developments should contribute to meeting the needs of policing and community safety equally as for education and health • Support the approach in principle but more work is needed to calculate the tariff and analyse infrastructure costs to 2021 • Transport should get a higher share of the income to support sustainable development <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 13 Residential Planning Gain Tariff Cont'd			Spennhill Regeneration Ltd, Mersea Homes, Crest Nicholson, Highways Agency, Suffolk Constabulary, Suffolk Housing Society, L Akdemir, S Sadler		<ul style="list-style-type: none"> • Should be an on-site requirement for provision of some facilities for smaller developments as well as larger ones e.g. community centre, children's play, teen facilities • Broadly welcomed as lending more certainty to developers but careful consideration must be given to its level to avoid compromising future investment • Support in principle but RSLs should not pay the full tariff because they meeting local housing needs • The tariff should not apply to affordable housing schemes developed by RSLs • Must have regard to the Community Infrastructure Levy guidance (GO East) • Object to the principle of a flat rate tariff for all residential units – small sites or sites providing some affordable housing should be exempt • How will developers contribute to the tariff as well as providing affordable housing • Planning contributions should be used to provide funds ad hoc without reference to the characteristics, viability and impacts of a particular development • Approach should comply with C05/2005 • Affordable housing should be included where it cannot be provided on site • Funding for roads and car parks should be identified separately from that for sustainable modes and the allocation of funds aligned with RSS transport policies • Reinstate a planning obligation strategy as there is no policy basis on which to promote a tariff approach • Tariff approach ignores brownfield development costs

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Develop ment of the Strategy	Policy Area 14 Affordable Housing	20	4	EEDA, Shelter, Home Builders' Federation, Suffolk County Council, Andrew Martin Associates, GO East, National Grid, The Riverside Group, Flagship Housing Group, Ipswich Hospital NHS Trust, Suffolk Mental Health Partnership NHS Trust, Ipswich School, IBC Labour Group, Associated British Ports, Bellway Homes, Spenhill Regeneration Ltd, Mersea Homes, Crest Nicholson, David Wilson Homes, S Sadler	Iceni Homes Ltd, M Brain, Sanctuary Hereward, Orwell Housing Association,	<ul style="list-style-type: none"> • Broadly support the 40% target but does the evidence show that this will not have an adverse impact on potential future commercial investment? (EEDA) • Welcome the 40% target but greater justification is needed for targets as low as 20 and 25% for smaller developments • Target should be for at least 35% on sites below 15 units • The SHMA should inform these percentages and thresholds – what evidence are the proposed figures based on? • Development viability and the availability of grant funding will need to be taken on board in any policy (especially on brownfield sites with abnormal costs) • There must be some flexibility for a site by site approach • The definition of affordable housing should include supported housing e.g. very sheltered housing to address demographic changes • Housing Need information is out of date • Unclear how this policy relates to Policy Area 38 (GO East) • Submission policy should accord with PPS3 (GO East) • Reduce the affordable housing threshold to 30% • Support, but provision should be on-site where possible and should reflect need, and clear information should be given on shared ownership, grant allocations, Sections 106s and commuted sums (Flagship) • There is no reference to the provision of key worker housing – key workers are vital to the Hospital Trust's modernisation programme – so the policy should set out what proportion of the target would be key worker accommodation • The target is unsustainable and too inflexible and should be 35% as in RSS to be more realistic and achievable • The target should be 50% to meet demand • The target should be more ambitious than 40% & the tenure split should be 80/20 based on the Housing Needs Study <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 14 Affordable Housing Cont'd					<ul style="list-style-type: none"> • How the targets will be applied site by site should be covered by a development control policy • Reduce the target to 34% and allow for off-site provision • Policy should be clear about the degree to which committed sites are able to contribute affordable housing provision and show that no extra burden will be placed on new sites as a consequence • The over-concentration of new housing development in flatted schemes that cannot provide an adequate number or mix of affordable units will exacerbate the level of undersupply
8 Development of the Strategy	Policy Area 15 Number of jobs to be planned for	6	0	Suffolk County Council, EEDA, L Akdemir, Ashfield Land, Crest Nicholson, David Wilson Homes, H Cooper		<ul style="list-style-type: none"> • Not clear how the 18,000 job target is converted into a land use requirement • Any employment land review must look at the whole IPA • There is no strategy to attract or create the 18,000 jobs • Should improve rail services to Cambridge to improve access to jobs there • Need a balanced approach to supply high quality business land and premises alongside a suitable level of new homes (EEDA) • Estimate that the maximum number of jobs to be met through proposed allocations is 8,400 leaving a shortfall of 1,200 jobs therefore additional employment sites need to be identified • The allocations imply the loss of a substantial amount of employment land so how will employment targets be met? • Some of the jobs will need to be gained in the retail sector but existing retail sites are allocated for non retail uses in the Site Allocations and IP-One DPDs • If the level of house building continues without commensurate support of industry, then Ipswich will become a dormitory town for London

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 16 The implications for different employment sectors	4	2	The Theatres Trust, Ashfield Land, L Akdemir, David Wilson Homes,	The Ipswich Society, EEDA	<ul style="list-style-type: none"> • The Core Strategy should show how the employment change shown in Table 6 has been applied to determine the contribution that site allocations will make to meeting the jobs target • An employment land review should be carried out to guide this, in accordance with new regional guidelines • More emphasis should be put on tourism as a source of new jobs than retailing, as Ipswich is not a wealthy area • The development and management of cultural quarters can help address the need for affordable workspace for the creative industries by providing flexible space and encouraging clusters of activity that can trigger regeneration • The jobs target will not be delivered with significant areas of employment and retail land being allocated for residential uses, and many of the employment allocations already in employment uses
8 Development of the Strategy	Policy Area 17 The approach to strategic employment sites	9	2	Highways Agency, GO East, EEDA, EERA, Andrew Martin Associates, Suffolk Coastal District Council, Ashfield Land, J Norman, David Wilson Homes	The Ipswich Society, Crest Nicholson	<ul style="list-style-type: none"> • The identification of Cranes is a positive step in planning for employment growth but the Council should consider how it relates to other regional priority sites e.g. Adastral Park (EEDA) • The site could have significant traffic impacts on the A14 Nacton Road junction and this therefore needs careful assessment in accordance with DfT Circular C02/2007 (HA) • The site proposal should be made either in the Core Strategy or the Site Allocations DPD (GO East) • It is consistent with regional policy but more detail is needed (EERA) • The evidence base does not support this allocation – Ipswich does not need a strategic employment site <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 17 The approach to strategic employment sites Cont'd ...					<ul style="list-style-type: none"> • The site should be identified as a jobs-led opportunity site which could include bulky goods retailing • Part of the site could be a transport interchange • Cranes could come forward more slowly than expected because of contamination or HA concerns about traffic, and therefore an additional strategic employment site should be identified west of the Old Norwich Rd at Whitton • Should look to port-related activities to boost the economy and encourage a diversity of operators for stevedores, ferry routes and shipping lines • Office based activity should be located in the town centre
8 Development of the Strategy	Policy Area 18 The Approach to Retail Development	15	7	IBC Labour Group, Lidl UK, Planning Potential, Suffolk Coastal District Council, Indigo Planning, Gainsborough Retail Park Ltd, Spenhill Regeneration Ltd, David Wilson Homes, Sainsbury's Supermarkets Ltd, Allekirk Properties Ltd, M Brain, D Saunders, C Vint, J Norman, S Sadler,	The Ipswich Society, EEDA, PRUPIM, Shearer Property Group Ltd, Turnstone Estates	<ul style="list-style-type: none"> • Should not expand the town centre to include land north of Crown Street because there is unused capacity within the existing town centre and we need to prioritise the Mint Quarter site • Concern about retail units outside the town centre undermining the long term viability of the town centre • The Council should make provision for additional discount food retailing in the north and south of Ipswich to provide more choice and enhance the vitality and viability of the town • Out of town centre retailing can complement town centre retailing and contribute to sustainability by minimising the need to travel • The car parking charges need to be reduced to encourage shoppers into Ipswich town centre and enable it to compete with other shopping centres, and public transport including park and ride should be improved • Local centres and parades should be acknowledged as legitimate locations for development • Enhancing Ipswich town centre should not happen at the expense of smaller centres or innovative out of centre retailing

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 18 The Approach to Retail Development Cont'd ...					<ul style="list-style-type: none"> • The approach ignores the impact of large scale retail development on centres outside Ipswich e.g. Woodbridge • Object to the exclusion of Fore Street as it is an established shopping street (see also IP-One) • Should not extend the town centre and develop new shopping precincts, but instead ensure the heart of the shopping centre is alive and working, has a diversity of attractors, and is accessible • Out of centre superstores should be discouraged • Must maintain the human scale of the town centre and control high rise buildings • Need more homes in the town centre to bring it to life in the evening • The policy should take account of forms of retailing that are not suitable in town centres, e.g. large format retailing, and specify types of retailing that would be acceptable out of centre • Retailing at the Volvo site would not impact on the town centre (para 8.392) but would complement it and enable provision of the road link • The Council's retail study is flawed and there is in fact a need for additional convenience good retailing • With no new retail land to be made available outside the town centre and the loss of such land at Ranelagh Road, the jobs target will not be met and inter-urban travel for shopping will increase as people drive further for bulky goods shopping • The policy should provide for improvements to the retail offer of existing out of centre foodstores e.g. Sainsbury's at Hadleigh Rd, where they will provide a district centre function and not impact adversely on existing stores • Object to approach to Orwell Retail Park in relation to PA18 – the policy should acknowledge its potential for a retail-led mix

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 19 The Approach to Non-residential Planning Gain Tariff	13	1	Shearer Property Group Ltd, Highways Agency, Sport England, Suffolk County Council, EEDA, Planning Potential, The Theatres Trust, PRUPIM, Cycle Ipswich, Spenhill Regeneration Ltd, David Wilson Homes, Sainsbury's Supermarkets Ltd	Environment Agency,	<ul style="list-style-type: none"> • Welcome the clarity but the tariff would need to comply with C 05/2005 • Policy should state that contributions may be needed to mitigate development impacts on trunk roads (HA) • Non-residential developments should make provision for open space including sport and recreation facilities, as they generate demand for them (SE) • Agree in principle but more work is needed to calculate the tariff and infrastructure costs • If the approach to S106 Obligations is adopted, the suggested split does not provide enough funding for transport • Levels of tariff will need to be carefully set so as not to compromise future investment in the town (EEDA) • The Council will need to have regard to government proposals for a Community Infrastructure Levy (EEDA) • Object to rigid implementation of a tariff – it should take account of the constraints of individual sites • Combine Policy areas 13 and 19 and put the details (including Appendix 4) in an SPD that sets down exactly what is required of a developer • The approach is contrary to C05/2005 because there is no confirmation that funds will not be used to rectify existing deficiencies • It is difficult to respond without knowing the tariff figure • Appendix 4 – object to the breadth of items identified as some e.g. refuse collection are funded from other sources • Funding for roads and car parks should be identified separately from that for sustainable modes, which should be prioritised as per RSS - otherwise there is a danger that the biggest projects will swallow all the resources • Delete the tariff based approach and replace with planning obligations as it is contrary to government guidance and does not work on brownfield regeneration sites <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 19 The Approach to Non-residential Planning Gain Tariff Cont'd ...					<ul style="list-style-type: none"> • The policy should not propose infrastructure as essential to support the plan without the certainty of the significant public funding contributions that would be needed to make up the shortfall from the tariff • The tariff is inappropriate because there is no national policy basis for it and it is contrary to C05/2005 because it would not demonstrate a direct link between the development concerned and the infrastructure being provided • If the policy is pursued then its detail should be the subject of separate consultation e.g. through an SPD
8 Development of the Strategy	Policy Area 20 The Approach to Education Provision	6	1	Suffolk County Council, M Brain, L Akdemir, GO East, Ipswich School, Crest Nicholson	EEDA	<ul style="list-style-type: none"> • Secondary schools should be local, so as to avoid generating extra traffic and therefore sites for new or extended schools should be identified across the town • Suffolk School Reorganisation review and Building Schools for the Future may have implications for the future use of some education sites in Ipswich (SCC) • Libraries will need funding through Section 106 schemes to improve facilities to deal with population growth (SCC) • Support the general approach but the sixth form centre should be located in the Education Quarter to promote greener travel and progression into college and university courses on the campus • The policy direction is unclear – the submission policy should indicate what educational provision is needed and where it will be located (GO East) • The policy should allow for the expansion needs of existing schools and for these to be accommodated through the site specific policies • Object to the absence of a strategic review of the implications of development on demand for early Years, Primary and Secondary Places • A site for a new secondary school in North Ipswich should be identified on land at Henley Rd adjacent to Castle Hill

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy area 21 The Approach to Green Corridors	9	6	Sport England, English Heritage, Environment Agency, EERA, Ipswich School, Mersea Homes, Crest Nicholson, K Matthews, A Matthews,	Natural England, Greenways Countryside Project, RSPB, IBC Labour Group, Ashfield Land	<ul style="list-style-type: none"> • Support the green corridors but concerned that the PPG17 Assessment of open space, sport and recreation facilities was not available to guide the preparation of DPD in relation to need for new facilities and standards to be applied (SE) • The contribution that cultural heritage assets make to green infrastructure should be acknowledged in the policy • Support the approach but green corridors should not be limited to publicly accessible greenspace – inaccessible green areas such as woodland have a role in creating a rim around the town (EA) • The key diagram should show the St Clements golf course green corridor (EA) • Add a provisional green corridor to the east of Ipswich including the St Clements site • The policy area appears consistent with RSS but detailed policy wording is needed (EERA) • Support in principle but the green rim should not inhibit the future development of the northern fringe • Support in principle but the policy should be developed in the context of a borough-wide green infrastructure strategy
8 Development of the Strategy	Policy Area 22 The Approach to Open Space	15	2	Greenways Countryside Project, Home Builders' Federation, Natural England, Sport England, The Riverside Group, EERA, IBC Labour Group, Ipswich School Cont'd ...	The Ipswich Society, Environment Agency	<ul style="list-style-type: none"> • Object to the blanket rule of 10% provision which would result in under-provision in large high rise developments – open space should be included in the tariff system or the scale of provision should relate to the number of units • Policy ignores existing levels of provision • Provision should be dealt with through tariff approach • Additional on site open space created through such an approach must form part of a coherent wider network with the green corridors • Support the approach but it should include reference to sport and recreation facilities and their role as part of the multifunctional character of open space (SE) <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 22 The Approach to Open Space Cont'd ...			Ashfield Land, Bellway Homes, Spenhill Regeneration Ltd, Mersea Homes, Crest Nicholson, L Akdemir, K Matthews,		<ul style="list-style-type: none"> • The policy should be based on an up to date PPG17 assessment (SE & others) • The policy should include standards for sports facility provision (SE) • The policy should include a requirement for parkland rather than small patches of greenery so children have room to run around, especially close to flats • The policy should include the protection of some sites and recognise that sites vary in their ecological and communal importance • Support in principle but detailed wording is needed (EERA) • Smaller sites should be excluded from the requirement and sites close to existing protected open spaces also • Support, but the policy should allow sites that straddle the borough boundary to provide the open space portion outside the borough • A criteria based approach would be more appropriate that takes into account e.g. deficiency and site characteristics • Has the 10% been taken into account in estimating site capacities – raises further concerns about site densities • Open space provision should be determined on a site by site basis • Object because it could undermine the potential of brownfield sites to be maximised and it ignores development costs – thus off site provision should be acceptable

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 23 Strategic Flood Defence	10	1	Environment Agency, EERA, GO East, RSPB, Ipswich School, Associated British Ports, Spenhill Regeneration Ltd, Mersea Homes, Crest Nicholson, M Brain,		<ul style="list-style-type: none"> • Support, but question whether the barrier is adequate to deal with the flooding risks Ipswich could face including the threat from heavier rain storms and how would its non-provision affect the plan? • Support in principle but the policy appears to ignore the PPG25 sequential test and SFRA⁶ (EA) • Need more detail and clarity in the submission version (EA) • Policy areas 23 to 27 should be incorporated into the delivery and implementation section (GO East) • There should be a presumption against inappropriate development in the flood plain, which should be allowed to function naturally • Impacts of the tidal surge barrier on the SPA⁷ are not addressed – it may need appropriate assessment • The barrier should not be included in the plan unless funding has been secured • The Council should not rely on the assumption that sites in the floodplain will be immediately developable, and therefore land in north Ipswich should be allocated for development • Concerned that income from the tariff will not be sufficient to bring the tidal barrier forward during the plan period and therefore the EA should seek further central government funding for it • Object to reliance on the SFRA and its funding through the tariff as the SFRA is flawed and incomplete (it refers to further studies needed) • No sequential test has been done to inform the Core Strategy, as required by PPG25 and PPS3 • The Core Strategy says the barrier will be built by 2016 (para 11.10) and the SFRA by 2012 – this needs clarifying • Question the likelihood of implementation of the barrier because of rising costs and uncertainty about funding

⁶ Strategic Flood Risk Assessment

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 24 Provision of Health Services	5	0	The Ipswich Society, GO East, Ipswich Hospital NHS Trust, Suffolk Mental Health Partnership NHS Trust, Crest Nicholson		<ul style="list-style-type: none"> • Support rationalising provision onto the Heath Road site but more works must be done to improve transport matters • Await the findings of Lord Darzi's report before planning changes to GP surgeries • Support the consideration of infrastructure needs, but they should all (i.e. policy areas 23-27) be addressed together in the delivery and implementation section (GO East) • Should refer to the NHS Trust's Estate Strategy and related development proposals • Modernisation of the estate is driven by patient needs (as set out in the Business Case) and reflects demographic change up to 2021 • The development of mental health facilities at Heath Road should not be conditional upon the relocation of a GP practice onto the Heath Road site • The Estate Strategy for Heath Road includes details of the required facilities, associated infrastructure, car parking and travel plan measures • Add reference also to the Trust's Modernisation of Inpatient Services • Residential use is not the only option for St Clements Hospital site, and other uses should be considered (Crest)

⁷ Special Protection Area for Birds – a designation covering part of the Orwell Estuary

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy area 25 Waterfront and town Centre Transport	25	3	Highways Agency, The Ipswich Society, Suffolk County Council, Sustrans, University Campus Suffolk, English Heritage, Environment Agency, GO East, RSPB, PRUPIM, Shearer Property Group Ltd, Associated British Ports, cycle Ipswich, Spenhill Regeneration Ltd, David Wilson Homes, L Akdemir, D Saunders, J Norman, P M Hemingway, S Sadler, H Cooper	M Brain, Suffolk Wildlife Trust, IBC Labour Group	<ul style="list-style-type: none"> • The Wet Dock Crossing or the Northern Bypass have the potential to result in material changes in traffic demand affecting the A14 but their effects have not been examined – this must be done in accordance with C02/2007 (HA) • The Wet Dock Crossing is the most achievable scheme and should follow a route across the lock (using a swing or lifting bridge) and to Bath Street – this should not wait on development of the Island Site • Star Lane gyratory could be improved by radical traffic management schemes and an east-west bus service • The local highway authority is not promoting any new road proposals in Ipswich (SCC) • The Ipswich Transport Strategy and 2006-2011 LTP⁸ set out an approach to constrain demand for transport, to achieve more efficient use of the existing network and improve accessibility for non-car modes (SCC) • The Buchanan proposals for the Waterfront should be implemented without the need for additional road capacity (SCC, Sustrans) • Any increase in road capacity will increase traffic levels • Concerned about the potential for a Wet Dock Crossing to redistribute traffic from the gyratory to Duke St, Fore Hamlet and Back Hamlet, thereby worsening air quality and the environment of UCS⁹ (UCS) • Changes to the gyratory should not have to wait for the Wet Dock Crossing to be completed – they are needed to enable development of more attractive walking and cycling routes from the Waterfront to the town centre and station (UCS) <p>Cont'd ...</p>

⁸ Local Transport Plan

⁹ University Campus Suffolk

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy area 25 Waterfront and town Centre Transport (cont'd)					<ul style="list-style-type: none"> • Support a Wet Dock Crossing but transportation issues in the Wet Dock have not been adequately considered in relation to the new developments in the area (EH) • Wet Dock Crossing would need an Environmental Impact Assessment and the development of Island Site raises flood risk issues (EA) • This policy area, together with 23-24 and 26-27, should be addressed in the delivery and implementation section (GO East) • Wet Dock Crossing could have a negative impact on the Orwell Estuary SPA, contrary to PPS9 – more sustainable transport measures should be promoted as in Transport Fit for the 21st C • Improved public transport links between the station, town centre and Waterfront should not be at the expense of public realm and highway improvements to improve provision for cyclists and pedestrians • Support improved highway capacity but changes should not harm the accessibility of the town centre by a range of modes including for servicing • Need for the Wet Dock Crossing has not been proven and if it is, detailed consultation will be needed with ABP on the engineering requirements of the project • Managing traffic flows should be addressed as a top level issue and the wet Dock Crossing should not be built • The Core Strategy should consider inter-urban public transport as per RSS policy T5 • Consideration should be given to creating a coach interchange at one of the park and ride sites to avoid coming into town and speed up performance • The DPD does not address the issue of cycles on trains, or cycle parking/storage at regional transport centres <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy area 25 Waterfront and town Centre Transport (cont'd)					<ul style="list-style-type: none"> • Should address RSS policy T9 Walking Cycling and Non-motorised transport, and consider the needs of cyclists and pedestrians separately • Budget should be allocated to improving cycling facilities and the Council should engage with local cycling groups: Cycle Ipswich, Sustrans, CTC and Team Ipswich Cycling • Should remove all reference to the East bank Link Road as there is no funding for it • Object to emphasis on Transport Fit for the 21st C, the potential for alternative east-west capacity, and the suggestion that its funding should come from Planning Gain Tariff – the latter should not be used to tackle pre-existing problems on which they have no impact • Development within IP-One is too dependent on infrastructure solutions that may not come forward e.g. the Wet Dock Crossing • Should clarify whether the need is for additional or alternative capacity • Reducing the capacity of the gyratory will have a detrimental effect on the flow of traffic and have repercussions elsewhere in the town • The Core Strategy does not address traffic density in Ipswich • Growing traffic levels necessitate the provision of substantial new infrastructure • Area car parking should be provided on underused land, e.g. some allotments • We should not do more of the same [providing for the car] when we know this has consistently failed to solve the underlying problem – instead we should place far more emphasis on alternative modes of travel • Any northern bypass study should also look at the advantages of alternatives e.g. cross town cycle routes and improved bus services <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy area 25 Waterfront and town Centre Transport (cont'd)					<ul style="list-style-type: none"> • Cyclists need dedicated cycle tracks instead of lanes on roads • Underground parking is a more efficient way to use land than surface parking – build one under Alexandra Park • Transport and other infrastructure should be provided before additional development takes place • Star lane should be put in an underpass • If the Wet Dock Crossing is to carry substantial amounts of traffic from East Ipswich across the river, then the traffic should be directed towards London Road and not down Wherstead Road • Two supporters welcome the omission of East Bank Link Road (IBC Labour Group, SWT)
8 Development of the Strategy	Policy Area 26 The A14	18	3	Greenways Countryside Project, Highways Agency, The Ipswich Society, Suffolk County Council, Environment Agency, GO East, Little Bealings Parish Council, Ashfield Land, RSPB, IBC Labour Group, Gainsborough Retail Park Ltd, Crest Nicholson, M Brain, D Saunders, S Herbert, I McKie	Suffolk Coastal District Council, M Gray, Associated British Ports	<ul style="list-style-type: none"> • Object to northern bypass because new roads are hugely damaging to critical natural assets and public access to and enjoyment of the countryside and providing extra road capacity is not the solution to traffic problems • Support non-allocation of the East Bank Link Road but object to its remaining a possibility, as it would have serious negative impact on Orwell Country Park and surrounding assets including the SPA and has been the subject of sustained public opposition – it should be ruled out • Reiterate opposition in principle to any East Bank Link Road and any proposals for additional junctions on the A14 (HA) • The proposals (Wet Dock Crossing and northern bypass) should be supported by evidence to show that they are necessary to enable the Core Strategy to be delivered (HA) • Object to northern bypass because there is no evidence it would ease Star Lane problems, new roads generate more traffic, it would spoil a countryside area and there is no funding for it • East Bank Link Road should not be built because it would require retail development on Volvo site and it would not ease traffic on the Star Lane gyratory <p style="text-align: right;">Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 26 The A14 (cont)					<ul style="list-style-type: none"> • Neither the HA nor SCC has plans to promote a northern bypass, and it is not included in RSS, therefore it is unlikely it would be delivered in the plan period (SCC) • There is no evidence that additional east-west capacity is needed – many peak period east-west movements are very local to the town centre (SCC) • Further information is needed on trip origin and destination of traffic on the A14 to evaluate whether the proposals would alleviate congestion and this work is underway (SCC) • SCC Transport Strategy and RSS focus on demand management rather than providing new roads (SCC) • Support proposed roads but they will not be complete until late in the plan period so traffic management will also be needed in the meantime • Any road proposals will need testing for environmental impacts (EA) • This policy area, together with the remainder of PAs 23-27 should be addressed in the delivery and implementation section (GO East) • Should improve access into the Bury Road park and ride from the A14 to reduce queuing, and increase its capacity, by allocating land to the north of it for development • Work on the northern bypass would be a waste of time – focus on the Wet Dock Crossing (IBC Labour) • Volvo site should be developed for retail use to improve the retail offer, regenerate the area and fund East Bank Link Rd • Object to northern bypass because it cannot be delivered, would cause great environmental impact and would undermine established travel demand policies therefore remove reference to it and the East Bank Link Rd • Against northern bypass and would prefer East Bank Link Rd proposal and completion of the bus lane and priority route all the way from Martlesham to central Ipswich (LBPC) <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
8 Development of the Strategy	Policy Area 26 The A14 (cont)					<ul style="list-style-type: none"> • Growing traffic levels necessitate the provision of substantial new infrastructure and better control of car parking • Should reject northern bypass and instead use congestion charging to improve more sustainable transport options, because the bypass would create more congestion, blight a swathe of land and property, prejudice provision of the green rim, create noise and air pollution, create longer journeys out to tranquil areas for recreation, and use good agricultural land • Supports – SCDC and M Gray support work to investigate a northern bypass; ABP supports the East Bank Link Road
8 Development of the Strategy	Policy area 27 Electricity Capacity	1	0	GO East		<ul style="list-style-type: none"> • Policy Areas 23 to 27 should be incorporated within the delivery and implementation section of the core strategy
Chapter 9 Development of Key Diagram	Page 99	2	0	GO East, Environment Agency		<ul style="list-style-type: none"> • Draft diagram in Appendix 5 is unclear and does not clearly indicate the spatial strategy for Ipswich – it should set out broad locations of development and be clear about what development is proposed (GO East) • Reserve judgement until further work has been done on the key diagram to ensure it complies with guidance PPS12

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Comments on and/or omissions from whole chapter	8	1	Suffolk County Council, EEDA, Environment Agency, EERA, GO East, Cycle Ipswich	The Theatres Trust	<ul style="list-style-type: none"> • Object to omission of policies on public rights of way and reference to the Strategic Routes Map, Ipswich Definitive Map and Rights of Way Improvement Plan (SCC) • Should include a development control policy that identifies the quantity and location of employment land proposals that will be supported (EEDA) • Should include a development control policy that requires the provision of ICT on all sites (EEDA) • Should include a development control policy that protects employment land from higher value uses (EEDA) • Should include a development control policy about the re-use of contaminated land in accordance with PPS23 (EA) • Should include a development control policy on pollution prevention and control (EA) • Sustainable construction and local distinctiveness should be covered in the development control policies (EERA) • Support the low number of development control policies, but consider that many policy areas identified in the core strategy are not strategic e.g. policy areas 3,4,8,9,10,21,and 22 and could be incorporated here instead (GO East) • The council should include a statement that it will rely on national policy in relation to certain topics (GO East) • Issues in RSS policy T1 should be addressed specifically at the start of a new section on Transport
Chapter 10 Development Control Policies	Para 10.155	2	0	English Nature, M Brain		<ul style="list-style-type: none"> • There are important local dimensions to some policy areas, such as Ipswich's relationship with the Suffolk Coast and Heaths AONB, that should be addressed through a specific policy • Allotments may become more valuable as climate changes and food costs rise, and they are vulnerable to development – they should be protected

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 28 Carbon Footprint	14	1	Sustrans, Environment Agency, EERA, Anglian water Services Ltd, RSPB, PRUPIM, IBC Labour Group, Cycle Ipswich, Spenhill Regeneration Ltd, Mersea Homes, M Brain,	Highways Agency	<ul style="list-style-type: none"> • The approach seems sensible but would be better if related to actual results rather than just the theory before a development starts • Support, but we should do more to prepare Ipswich for a low carbon way of life e.g. developing district centres so they meet all everyday needs, more pedestrianisation, more provision for cyclists, and community sustainable energy schemes • Reference should be made to paras 24 and 32 of PPS Climate Change (EA) • Must emphasise the importance of achieving the highest possible standards of water conservation (EA) • Council should use the Code for Sustainable Homes rather than EcoHomes or BREEAM, and adopt stepped targets in line with the government's objectives (EA) • The policy should set out clear sustainability ratings for developments and should be supported by a detailed SPD¹⁰ (EA) • Need to see policy detail including a target for renewable energy to determine compliance with RSS policies ENG1 & ENG2 (EERA) • Need to see policy detail on water efficiency and integrated water management to determine compliance with RSS policies WAT1 & WAT4 (EERA) • Support principles of water efficiency but would like more emphasis on use of the Code for Sustainable Homes to enable effective management measures to be applied (AW) <p>Cont'd ...</p>

¹⁰ Supplementary Planning Document – a document prepared by the Council that provides more detail on policy areas set out in a DPD

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 28 Carbon Footprint (cont'd)					<ul style="list-style-type: none"> • Support, but would like to see contributions from new developments to fund grant and incentive schemes for homeowners to install energy saving and renewable energy measures in existing homes • Policy should refer to EcoHomes excellent standard • Welcome in principle but reduction of carbon impacts must be achieved through an achievable, viable and measurable process • Need to be more specific about targets and the baseline we are measuring from • Include a checklist of requirements covering energy efficiency, water conservation, sustainable materials, reusable materials, environmental drainage and transport • Need a stronger statement on renewable energy – at least 10% and higher in line with current best practice • Distinguish between emissions reduction and climate change adaptation & include emissions reduction targets for transport • Object to prescriptive targets without any flexibility built in to take account of the constraints affecting individual sites that would add to development costs
Chapter 10 Development Control Policies	Policy Area 29 Flooding and Sustainable Draining	8	0	Environment Agency, EERA, RSPB, IBC Labour Group, Spenhill Regeneration Ltd, Mersea Homes, M Brain		<ul style="list-style-type: none"> • Need to see more detail (EERA & others) • Need to include a development control policy on flood risk linking to the SFRA and referring to sequential test (EA) • Need to agree alternative sites to be considered in sequential test (EA) • A policy covering sustainable urban drainage systems (SUDS) should put the onus on the developer to demonstrate any limitations on its application (EA) • Developments should be assessed for suitability for SUDS that provide wildlife benefits e.g. ponds • Need a more robust approach & more precise definitions • Should require developers to have a flood evacuation plan in place to deal with flood risk <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 29 Flooding and Sustainable Draining (cont'd)					<ul style="list-style-type: none"> • Clarify that the policy will be applied flexibly to take account of the constraints affecting individual sites, rather than prescriptive reliance on the SFRA • PA29 should recognise that the sequential approach to development in areas of flood risk must be applied to Ipswich • PA29 must set out the timing of flood defence works and their implications for spatial policy and the phasing of development
Chapter 10 Development Control Policies	Policy Area 30 Urban Design Policy	8	1	The Ipswich Society, CABI, English Heritage, Environment Agency, IBC Labour Group, Bellway Homes Ltd, Spenhill Regeneration Ltd, Crest Nicholson	Bidwells	<ul style="list-style-type: none"> • Need more emphasis on design with more refusal for bad design, and to limit tall buildings to the Waterfront • Robust design policies should be included in all LDF documents, embedding design as a priority from strategic down to site level (CABI) • Design should be treated as a cross cutting issue (CABI) • Policy should provide hooks for design guides, site briefs and design codes (CABI) • General support (para 10.50) except for approach to tall buildings which should be more limited (EH) • Support inclusion of a policy but need more detail set out in an SPD (EA) • Should produce an Ipswich Urban Design Guide that developers can use as a benchmark of design quality • Approach is too vague and gives no indication of what type of design should be improved on, therefore delete the policy • Clarify that the policy will be applied flexibly to take advantage of the brownfield sites in sustainable locations • Should clarify that the proposed requirements should be met within Design and Access Statements and that no additional design statement will be needed • Delete the final bullet point about better standards

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 31 Protecting Our Assets	12	5	Sport England, Suffolk County Council, English Heritage, Environment Agency, GeoSuffolk, EERA, Suffolk Wildlife Trust, The Theatre Trust, IBC Labour Group, Crest Nicholson,	Greenways Countryside Project, Natural England, M Brain,	<ul style="list-style-type: none"> • Support, but the policy should refer to open space and recreation facilities (cross referring to policy areas 21 and 22) and various background documents (PPG17, Open Space Study, Active Design, etc.) • Should include a policy about protecting the town's assets and an SPD on the conservation of the historic environment (SCC) • Need to agree with English Heritage an appropriate approach to ensuring that a representative sample of archaeological deposits is protected for future generations, and de-schedule the remainder (SCC) • Policy should also refer to the Suffolk BAP (SCC) • Support a generic policy but a further policy is needed relating to the key aspects of the historic environment that are so important in Ipswich (EH) • Support in principle but the policy must also address impacts from development on adjacent sites (EA) • Should mention Suffolk Local Geodiversity Action Plan in accordance with PPS9 and cover geodiversity and biodiversity matters • The policy needs to address RSS policies ENV2 to ENV5 • Support the policy but it should also identify sites for the restoration of existing or creation of new priority habitats • It is not clear whether museums, libraries, theatres and cinemas are included as cultural assets and this needs clarifying so they are protected • The policy should refer to extending conservation areas, protecting streets or buildings which currently have no protection, and protecting attractive facades or features • Object to the requirement for equivalent or better assets in fourth bullet as this is too inflexible and does not allow scope for recognition that wider benefits may derive from a proposal involving the loss of an asset

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 32 Small Scale Residential Development	3	2	Greenways Countryside Project, Bidwells, IBC Labour Group	The Ipswich Society, M Brain	<ul style="list-style-type: none"> • Need to recognise potential loss of local biodiversity associated with small scale residential development (e.g. in gardens) • Need to clarify that this approach would not prejudice the creation of new terraces on regeneration sites • Need to distinguish infill sites from garden sites to prevent the loss of back gardens • Should be more flexible about terracing effect and assess schemes on basis of their effect on streetscape and neighbouring properties • Need the policy to result in development that avoids cramped, over-developed layouts
Chapter 10 Development Control Policies	Policy Area 33 Bedsits and Other Types of Houses in Multiple Occupation	1	1	IBC Labour Group	M Brain	<ul style="list-style-type: none"> • Need to ensure the policy protects 3-bed family homes from subdivision, and protects neighbourhoods from consisting of more than 40% houses in multiple occupation (wording suggested)
Chapter 10 Development Control Policies	Policy Area 34 Travel demand Management	11	2	Highways Agency, The Ipswich Society, Suffolk County Council, M Brain, IBC Labour Group, Cycle Ipswich, Crest Nicholson,	Sustrans	<ul style="list-style-type: none"> • Should refer to C02/2007 which gives guidance on demand management, and the 'Essential Guide to Travel Planning' (HA) • Policy should require transport related assessments to follow the DfT document 'Guidance on Transport Assessment' and C02/2007 (HA) • Need more emphasis on adequate, secure and overlooked cycle parking and shower/changing facilities in new non-residential buildings • Welcome the approach but need a definition of major development (SCC) • Support but could it also seek to reduce the need to travel throughout Ipswich rather than just within new developments Cont'd ...

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 34 Travel demand Management (cont'd)					<ul style="list-style-type: none"> • Policy should ensure that pedestrian and cycle access is along clear design lines • Corridor studies should be applied to Bramford Rd, Nacton Rd, Felixstowe Rd and Duke St • Managing traffic flows should be addressed as a top level issue throughout the plan – the policy only relates to new housing development and does not address wider issues of traffic demand management across the town • Need reference to inter-urban travel and cycle storage at regional transport centres • Need to consider the needs of cyclists and pedestrians separately • Support but it could go further to ensure that development takes account of the full range of measures available through the Smarter Choices agenda e.g. car clubs, park & ride.
Chapter 10 Development Control Policies	Policy Area 35 Parking	9	2	Suffolk County Council, M Brain, C Vint, IBC Labour Group, Cycle Ipswich, Spenhill Regeneration Ltd, Crest Nicholson	The Ipswich Society, Bidwells,	<ul style="list-style-type: none"> • Support, but the extent to which car parking provision and price affect demand for car travel has not been adequately addressed - especially the availability of long stay parking and commuter journeys (SCC) • Support, subject to ensuring that alternative transport facilities are available to serve developments where parking provision is minimal • Object to lack of support for cycle parking in existing areas • Policy does not recognise the rights of existing residents when considering parking for new developments • Should ensure that applications on sites on arterial roads provide reasonable displacement parking for existing properties • Need to tackle parking on pavements • The increase in public parking proposed in the document is against regional and national policy to manage traffic demand Cont'd ...

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 35 Parking (cont'd)					<ul style="list-style-type: none"> • Object to the limited parking for non-residential developments in the town centre, as some retail developments e.g. food stores could not serve customers adequately without it • Object to lack of distinction between town centre and out of centre residential parking provision, which could result in overprovision in the town centre and increase congestion
Chapter 10 Development Control Policies	Policy area 36 Proposals in Retail Areas	5	3	Planning Potential, The Theatres Trust, PRUPIM, IBC Labour Group, M Brain,	The Ipswich Society, Shearer Property Group Ltd,	<ul style="list-style-type: none"> • Support, but the policy should protect residential communities at the edge of the shopping areas from any manifestations of the 24 hour culture e.g. bars and clubs • Support the retail hierarchy but all sites that would contribute to enhancing vitality and viability should be given due consideration • Community facilities should be covered in their own policy within the Core Strategy • Town centres are not just about shops – their vitality depends on leisure, recreation, and cultural uses • Change the existing policy basis and consider allowing the full range of town centre uses within the town centre • Support the focus on the centre and controlling out of centre retailing, but object to extending the central shopping area northwards across Crown Street, which could threaten the viability of existing central retail sites.
Chapter 10 Development Control Policies	Policy Area 37 Proposals Involving the Loss of Housing Units	2	0	C Vint		<ul style="list-style-type: none"> • Should allow for the loss of substandard housing • Need to allow for mixed uses in the town centre therefore some housing units could be lost

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 10 Development Control Policies	Policy Area 38 Detailed Affordable Housing Policies	8	0	Shelter, Home Builders' Federation, Bidwells, GO East, IBC Labour Group, Bellway Homes Ltd, Spenhill Regeneration Ltd, Crest Nicholson		<ul style="list-style-type: none"> Percentage of affordable housing should not just be calculated on floor space or habitable rooms rather than unit numbers – need separate targets for the number of small and large homes required to meet housing need Should await publication of the SHMA before proposing targets Policy will need to take into account scheme viability and the availability of grant Calculation based on floor space or number of rooms is not backed up by RSS, which uses households in need, or by best practice methodologies The approach is unclear, as is the relationship between this and Policy Area 14 – the submission version should accord with PPS3 paras 27-30 (GO East) Prefer a calculation based on floor space, and should also require that affordable units are dispersed across a development The mix of units on a site should be determined in relation to the SHMA and discussions with Housing Officers Object to criteria i) and iii) in para 10.147 because they are inappropriately rigid about off-site provision and more flexibility is needed Should base the calculation on number of units and discuss the nature of need on a site by site basis
Chapter 11 Implementation	Whole Chapter	7	1	Highways Agency, GO East, The Ipswich Society, Suffolk County Council, Anglian Water, Crest Nicholson, M Brain	EEDA	<ul style="list-style-type: none"> The core strategy needs to identify a fall back position to address the possibility that the major infrastructure schemes it has identified a need for do not come forward as expected - e.g. A14 capacity improvements (HA) The proposals must be deliverable and not dependent on matters outside the Council's control (HA) <p>Cont'd ...</p>

Chapter	Policy Area / page / para.	No. of objections	No. of supporters	Objector profile	Supporter profile	Key objection issues raised
Chapter 11 Implementation	Whole chapter (cont'd)					<ul style="list-style-type: none"> • Need more information about how, when and by whom the Council's vision, objectives and core policies will be delivered, the key dependencies and any risks and contingencies (GO East & others) • The delivery framework should include a housing trajectory setting out the anticipated delivery of housing (GO East) • It is vital to attain unitary status and expand the borough boundaries to achieve a sustainable plan in relation to transport • Table 8 – the Wet Dock Crossing needs to be brought forward, the northern bypass should be deleted, and the capacity of the A12 and A14 should be a priority for the HA • Table 8 footnote – only one of the northern bypass or the East bank Link Road would be needed – the Wet Dock Crossing would still be needed even if the northern bypass was built • Table 8 – should include reference to Water Cycle Study and the need for water and wastewater infrastructure, as this could influence the phasing of development (AW) • The delivery of the Wet Dock Crossing is unlikely therefore a route should not be safeguarded because it will cause blight (SCC) • Neither the HA nor SCC has proposals for a northern bypass therefore this is unlikely to be achievable (SCC)

Chapter 11 Implementation	Para 11.18	5	0	Home Builders' Federation, K Matthews, A Matthews, Ashfield Land, Mersea Homes,	<ul style="list-style-type: none"> • It is not clear why an application for greenfield development in the Northern Fringe would be premature • The development of the St Clement's Hospital Site (UC185 and UC262) should also be listed as premature • Object to non-employment uses on Strategic Employment Sites being premature, as it could preclude development such as gyms, hotels and restaurants which generate employment • Object to whole prematurity section, paras 11.13 to 11.23, as it is contrary to PPS1 and PPS3 and prejudices the preparation of the submission draft DPD, and any planning applications, which should be assessed on their merits
Chapter 12 Setting out key Targets Associated with Part B	Whole Chapter	3	0	Highways Agency, Sustrans, M Brain	<ul style="list-style-type: none"> • Objective 3 – the 90% target should be replaced by one relating to locally sustainable levels of re-use, to protect quality of life in the urban area • Objective 4 – should recognise the risk of IP-One becoming overloaded by too rapid a rate of development – need a measure to ensure the vision is delivered • Objective 6 should include reference to the number of travel plans negotiated for new and existing developments (HA) • Objective 6 - object to use of National Indicator 167 as there is no benefit in reducing average journey time for cars during the morning peak unless this is accompanied by a reduction in capacity and traffic. Need to encourage cycling and walking. NI178 is a better indicator (the reliability of public transport) that needs to be improved
Chapter 13 Monitoring and Review		1	0	EERA	<ul style="list-style-type: none"> • Policies for monitoring and implementation requirements should be included to ensure consistency with RSS

Table 2: Preferred Options Analysis – IP-One Area Action Plan

Please note that the table below covers general chapter, policy area and opportunity area comments first, then addresses the site related comments at the end. Thus, an employment site will be covered under Appendix A, rather than Chapter 7 where the suggested allocation appears.

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supports	Objector profile	Supporter profile	Key Objections issues raised
Whole document	-	1		GO East, A M Hunter		<ul style="list-style-type: none"> • The structure of the DPD is complicated and unclear (GO East) • The submission DPD will need to draw together and more clearly articulate the strategy for the IP-One area linking the spatial strategy, policies, the 4 areas of activity (e.g. Waterfront) and the 12 opportunity areas (GO East) • The area will prove too large for an area action plan and therefore the aims and objectives will not be manageable • The document lacks any real commitment to planning for people apart from some token greening
Chapter 1 Introduction	1.8	1	0	English Heritage		<ul style="list-style-type: none"> • Supports need for action plan, as described in para. 1.8, but conservation areas, scheduled monuments, and Opportunity Areas should be defined on Proposals Map (EH)
Chapter 1 Introduction	1.9	1	0	English Heritage		<ul style="list-style-type: none"> • Expand para 1.9 to explain that the area is central to the image and identity of the Borough, due to many intact heritage assets (EH)
Chapter 2 Portrait of IP-One	2.1	1	0	Environment Agency		<ul style="list-style-type: none"> • Lack of open space in river corridor and Waterfront area should be mentioned in the portrait of IP-One (EA)
Chapter 3 The Wider Policy	Comments on and/or omissions from whole	4	1	Home Builders Federation and EERA	The Ipswich Society	<ul style="list-style-type: none"> • Preferred Options documents should relate to National Planning Policies and advice - PPS1, PPS3, PPS12, PPS25, The East of England Plan, and PINS¹¹ advice Cont'd ...

¹¹ The Planning Inspectorate

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
Context	chapter					<ul style="list-style-type: none"> • Where a limited supply of brownfield sites is available, it is essential that sites identified and allocated are readily and realistically available for housing development. • Must comply with the overall housing requirement. • Need to ensure a range of both brownfield and greenfield sites are available. • Must seek to ensure a range of different types of housing are provided in different forms and in different localities • Any planning gain requirement should be considered in relation to site viability • Planning gain requirements must be realistic, if not Council will struggle to meet its housing supply requirements. • Re. affordable housing provision, proper and full regard must be had to overall viability of schemes in setting requirements. • A proper SHMA¹² is required, with the full involvement of the property industry to underpin the evidence base. • Policies should not replicate or replace sustainability standards already being set by Building Regulations and supported by new Code for Sustainable Homes. • The document is far too long, and separate, shorter DPD's should be prepared instead. • A lot of options are put forward without any evidence base to justify them. • Council's evidence should include a SHLAA¹³. • More practical to include all policy matters within the Core Strategy document. (EERA) <p>Cont'd...</p>

¹² Strategic Housing Market Assessment

¹³ Strategic Housing Land Availability Assessment

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						<ul style="list-style-type: none"> • Document is generally consistent with RSS but conformity issues would need to be addressed when specific schemes are progressed (EERA) • References require updating to reflect the current position with East of England Plan (EERA).
Chapter 4 Issues for IP-One	Comments on and/or omissions from whole chapter	2	1	English Heritage, Environment Agency	Shearer Property Group Limited	<ul style="list-style-type: none"> • Specific reference needs to be included to preserve and enhance the heritage assets including the spaces between and the settings of the historic buildings. (EH) • Conservation area appraisals should include consideration of their settings and boundaries, especially in the transitional zones e.g. where Wet Dock and Central conservation areas conjoin (EH) • With Urban Design Guidelines we urge strong and where appropriate prescriptive advice. (EH) • Re: Landmark Buildings need to give definition of 'tall' and other relevant terms should be explained. (EH) • Urge strong guidance on the location of tall buildings. (EH) • The 10 Key Issues as set out under para 4.2 are wide ranging and may make implementation of the plan's objectives and policies difficult to achieve over the plan period, but the EA is happy within its remit to help the Council achieve the vision (EA)
Chapter 5 Vision and Objectives	Comments on and/or omissions from whole chapter	6	4	Environment Agency, EERA, Go East, Shearer Property Group Limited, Crest Nicholson	University Campus Suffolk, Sustrans, EEDA, EERA	<ul style="list-style-type: none"> • Suggest vision should be more specific to the area rather than merely follow the Core Strategy. (EA) • Objective 10 should go further and aim for creation of green areas, not just 'greening' of the streets, which is perhaps, prima facie, a token gesture. (EA) • The conservation and enhancement of the historic environment should be covered by a policy not just an objective (EERA) <p>Cont'd...</p>

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						<ul style="list-style-type: none"> • Need a policy dealing with sustainable construction in accordance with RSS policy ENV6. (EERA) • Chapter 5 gives an objective for sustainable construction rather than policy. (EERA) • IP-One AAP vision should be more clearly articulated and include a reference to the end date of the plan and some specific, quantified issues. (GO East) • Object to vision that includes an aspiration for a less car dominated town centre - the town centre must continue to be accessible by all modes of transport. • The vision should also be to enhance the linkages between the station, Waterfront and the town centre. • Object to lack of clear timescale for AAP and lack of clear delivery targets for jobs and housing.
Chapter 6 Spatial Strategy	Comments on and/or omissions from whole chapter	3	1	Environment Agency, Shearer Property Group Limited, David Wilson Homes	EEDA	<ul style="list-style-type: none"> • Caution Council on the risk of providing cultural facility/visitor attraction on the Island site (para 6.9) in area of high flood risk because of potential for water damage to artefacts (EA) • Expect to see creation of pocket parks along the river frontage and around the waterfront area. (EA) • Support safeguarding of a site for a new tidal flood defence barrier at the New Cut (EA) • Object to extension of CSA boundary north across Crown Street to incorporate land north of Crown Street for retail development as it is separated from the main shopping area by the inner ring road • Spatial strategy for central Ipswich should provide a programme for delivering each new retail area in phases starting with the Mint Quarter being developed first • Object to the strategy because the capacity of land in IP-One is only for 1,300 to 1,500 dwellings, not the 3,000+ that the Council seeks to allocate

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Chapter 7 Work	Comments on and/or omissions from whole chapter	3	0	EEDA, Environment Agency, Robert Brett & Sons Ltd		<ul style="list-style-type: none"> • Council should consider how the allocated B1 office-led town centre sites relate to development of Martlesham Innovation Park, aspirations for Cranes site as a strategic employment site, and Adastral Park (EEDA) • Careful consideration needed of phased release of new employment land to ensure a balanced approach between jobs and houses. (EEDA) • EA comments submitted at Issues and Options stage apply to those sites that have come forward at Preferred Options stage (EA). • Some of proposed sites lie in the medium to high risk flood zones 2 and 3. Para 17 of PPS25 Development and Flood Risk is relevant here re: sequential test. (EA) • The Council need to provide evidence that demonstrates the Sequential Test has been carried out. (EA) • Evidence, in the form of stand-alone Sequential Test report, should be presented as baseline evidence in support of IP-One AAP submission document (EA) • The Council should safeguard the aggregate wharf at Wherstead Road from developments nearby that could be sensitive to its 24 hour operation
Chapter 7 Work	Policy Area 42 The Town Centre Boundary	4	2	The Ipswich Society, Suffolk County Council, J Norman, Shearer Property Group Ltd	University Campus Suffolk, Turnstone Estates	<ul style="list-style-type: none"> • Confused about the different areas referred to in IP-One and their boundaries e.g. town centre, central car parking area, central shopping area – needs simplifying. • Accept that the town centre boundary needs to be extended to accommodate necessary uses, but the southern extremities are too far (over 1km) from the central railway and bus stations so any major employers should be required to provide high quality public transport links (SCC) <p>Cont'd...</p>

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						<ul style="list-style-type: none"> • Extending the town centre boundary south to the brewery and west to include Ipswich Village extends everybody's concept of the 'town centre' – should call it the central business district instead • Support widening the town centre boundary but object to inclusion of land north of Crown Street in the central shopping area. • Supporting comments supporting the inclusion of the Education Quarter and former civic centre.
Chapter 7 Work	Policy Area 43 Site Allocations for B1 Use	3	2	Suffolk County Council, Ashfield Land, Turnstone Estates	The Ipswich Society, EERA	<ul style="list-style-type: none"> • All additional sites for travel intensive employment uses should be supported by improvement to access to public transport in accordance with PPG13 <i>Transport</i> (SCC) • The Council should estimate the number of net jobs likely to be generated on each site to clarify the contribution each makes to the overall employment target • Estimate that only 2,400 additional jobs are likely to be generated, assuming all sites come forward and that displaced uses can be relocated • Support 20% B1 use at the former Civic Centre site but the policy will need to be flexible to deal with the particular circumstances on a complex site (Turnstone) <p>Please see Appendix A for site comments</p>
Chapter 7 Work	Policy Area 44 Hotels	0	0	-	-	No comments received but see Appendix A for site comments
Chapter 7 Work	Policy Area 45 Leisure Developments	3	0	Sport England, The Theatres Trust		<ul style="list-style-type: none"> • Support identification of sites for large scale leisure in principle, but object to lack of reference to evidence that would support them, and more specific reference to how the allocations would meet sporting needs e.g. for sports halls and swimming pools – this must be addressed (SE) <p>Cont'd...</p>

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supports	Objector profile	Supporter profile	Key Objections issues raised
						<ul style="list-style-type: none"> • Need more detail to be able to comment • Leisure should be described as activities involving sport and recreation, irrespective of any Use Class classification
Chapter 7 Work	Policy Area 46 Protecting Existing Employment Areas	1	1	Mersea Homes	EERA	<ul style="list-style-type: none"> • PA46 should provide a basis for protecting existing employment uses rather than employment areas • Policy Area fails to provide an effective policy basis for decisions. Proposed approach has not been fully informed by an up-to-date evidence base. • The policy link should be made with other policy areas where residential allocations are made on employment sites • The relocation of employment uses away from the town centre will affect their accessibility • The evidence base must be appropriate and up to date
Chapter 8 Live	Comments on and/or omissions from whole chapter	3	0	Home Builders' Federation, EEDA, Mersea Homes, Crest Nicholson & David Wilson Homes.		<ul style="list-style-type: none"> • Housing Land Availability Study (2007) referred to is considered to be somewhat irrelevant now given the requirements of PPS3 and the accompanying SHLAA and SHMA Guidance. • In delivering RSS housing targets, the AAP should respond to SHMA study, meeting local need and delivering mix of residential types (EEDA) • Loss of buy-to-let market from the apartments sector in conjunction with high levels of apartments supply raises questions over viability of further apartment building • Commercial land values have increased; the lack of new commercial sites will help to ensure existing land values do not fall. • Cost of developing apartments is likely to escalate due to increased 106 provisions with respect to flood defence barriers, affordable housing, and need to satisfy the Code for Sustainable Homes • Total units sought is not achievable during plan period - identified viable maximum number of 1658 units in IP-One,

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						<p>so there is a discrepancy of 1590 units (Island Site counted as non viable)</p> <p>Cont'd...</p> <ul style="list-style-type: none"> The Council should safeguard the aggregate wharf at Wherstead Road from developments nearby that could be sensitive to its 24 hour operation – e.g. housing
Chapter 8 Live	Policy Area 47 Residential and Residential-led Mixed Use Allocations	4	0	Home Builders' Federation, Ipswich School, Mersea Homes, Crest Nicholson		<ul style="list-style-type: none"> Precise housing requirement will not be known until the Council has undertaken a SHLAA in conjunction with other key stakeholders. Cont'd ... The overall housing requirement is a minimum requirement that should be exceeded. Sufficient housing provision will need to be made for at least 15 years from the date of the plan's eventual adoption. Suitable sites should be identified in 5, 10 and 15 year potential land supply in accordance with national policy. Too many of the sites are within the flood plain and adequate flood defences may not be in place for many years (land north of Valley Rd should be allocated instead) The sites fail to offer housing choice as required by PPS3 Object to conclusion that 3,459 homes can be provided through sites in the IP-One AAP because the figures do not reflect risks associated with delivery Serious question of site viability (especially sites for flats) at time of worsening housing market and rising build costs Preferred Options allocations have been completed before many of supporting documents are in place <p>Please see Appendix A for site comments</p>
Chapter 8 Live	Policy Area 48 Cultural Facilities	4	0	The Ipswich Society, Environment Agency, The		<ul style="list-style-type: none"> Need a significant project to make Ipswich a tourist destination and the DPD needs to be more explicit about how it intends to take this forward Should not place valuable collections in an area of flood risk

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				Theatres Trust, Mersea Homes		<p>because of their vulnerability to water damage through flooding (EA)</p> <p>Cont'd...</p> <ul style="list-style-type: none"> • Future leisure, arts and cultural facilities should be located in the centre and be part of a successful mixed use environment • Theatres can be a major tourist attraction, and a festival or summer season can also be a draw, but this is dependent on suitable venues - a policy to promote theatre use as part of relatively small developments could make a strong contribution to the character of the town and enhance the tourist experience • Consideration should be given to the opportunity to plan for a strategic cultural offer in IP-One, and sites proposed for development should be reconsidered for their potential to contribute to a network of cultural spaces and places e.g. parkland and civic spaces
Chapter 8 Live	Policy Area 49 Community Facilities	0	1	-	The Ipswich Society	<ul style="list-style-type: none"> • All are supported
Chapter 8 Live	Policy Area 50 Design and Amenity in Town Centre Living	5	0	Home Builders Federation, The Ipswich Society, CABA, GO East, The Riverside Group		<ul style="list-style-type: none"> • There is no evidence base to justify the policy requirement for balconies or minimum floor space and this would add costs and affect affordability • Strong support but the policy should apply borough wide as design quality falls off badly outside the centre • LDF should include robust design policies embedding design as a priority from strategic frameworks to site specifics (CABA standard comment - not specific to this policy area) • Design should reflect understanding of local context and character and aspirations (CABA standard comment – not specific to this policy area)

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						<ul style="list-style-type: none"> • Some issues in para 8.65 go beyond the scope of the planning system e.g. internal layout requirements (GO East) Cont'd... • The submission policy should not include requirements that cut across other legislative requirements (GO East) • Support principles but object to minimum floor area and sound proofing • Affordable housing should not have to achieve higher standards than those imposed by grant providers
Chapter 8 Live	Policy Area 51 Sequential Approach to Location of Development	1	0	Mersea Homes		<ul style="list-style-type: none"> • PA51 should reflect national planning policy guidance in respect of the decision-making process for new residential development, as set out in PPS25 (the sequential approach to flood risk issues) and PPS3 (the range of considerations which should inform locational decisions). As a consequence of this reappraisal, we would anticipate changes to the spatial pattern of development and the allocations made in support of that.
Chapter 9 Travel	Comments on and/or omissions from whole chapter	6	0	Cycle Ipswich, S Marginson, Sustrans		<ul style="list-style-type: none"> • Insufficient cycle provision • Object to overall lack of traffic free cycle facilities. Needs to be changed to increase mobility within this confined area. • No mention of traffic flow improvements, pedestrian and cycling improvements. • The proposals will create a good deal more traffic - need to look at new infrastructure, traffic flow mechanisms, improved pedestrian facilities, improved cycle facilities. • Several transport documents are listed, which the Council should take into account • RSS Policy T1 is not properly addressed in Chapter 9 • Inter-urban transport is only mentioned briefly and therefore the DPD should address RSS Policy T5 setting out how inter-urban services could be improved, including the carriage of cycles on trains and cycle storage at stations

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						<ul style="list-style-type: none"> • Cycling and walking should be considered separately to draw out the different requirements of each mode Cont'd ... <ul style="list-style-type: none"> • Funding for roads and car parks should be identified separately from money allocated for the support of sustainable modes and allocations aligned with RSS objectives.
Chapter 9 Travel	Policy Area 52 Key Cycle and Pedestrian Routes	9	1	Environment Agency, The Ipswich Society, Suffolk County Council, H Cooper, Waterfront Churches, Cycle Ipswich, Sustrans, J Norman	EERA,	<ul style="list-style-type: none"> • Broadly support, but any access across the lock gate (Opportunity Area A) must not interfere with its operation and navigation rights and nor should a bridge across the New Cut (EA) • The riverside green corridor (Opportunity Areas F & G) should include the provision of green spaces funded in part through land/contributions from developers (EA) • Support proposed development of comprehensive cycle network but must ensure through the planning stage that continuous cycle routes are developed • Use reallocation of road space to provide safe environment for cyclists and pedestrians • Support the policy area but we need to be more radical in designing these routes and get away from DfT manuals and move towards a shared space approach • Routes across the lock, from the Waterfront to the town centre, from the station to the town centre are uninviting in every way • Key cycle and pedestrian routes are shown on the Opportunity Area plans but not on the preferred options map and not as part of an integrated network for the wider borough (SCC) • Support better links but would like to see pedestrian only options reviewed e.g. 9.29 the spine through the campus – cycling links with the campus will be important • Object to the lack of practical and safe cycling routes –

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						<p>creating a dedicated and contiguous cycle network must be the goal of the Council if it wishes people to cycle Cont'd ...</p> <ul style="list-style-type: none"> • A pedestrian and cycle route around the entire Wet Dock must be a central part of plans, to encourage healthier living and business activity • The network Management Plan should be updated to cover on-street cycle routes and the necessary pressure should be brought to bear on the County Council to make these changes • No mention is made of the benefits of reducing road speed on key cycle routes to 20mph even though this is recognised as an important tool to increase the safety of cyclists and pedestrians - 30mph limits should be reduced to 20mph • Car clubs should be promoted to reduce levels of car ownership and use and to reduce parking pressure • No mention is made of National Cycle Route 1 which passes through the town, and only brief mention of Route 51 • A budget allocation and commitment should be made to consulting widely with local cycling groups – Cycle Ipswich, Sustrans, CTC and Team Ipswich Cycling • Considerable improvements to the walking environment have been made but much more could be done e.g. to redesign crossings so they do not become water filled dips in wet weather and tackle pavement parking • Opportunity Area D para 9.29 – it is the intention of Suffolk New College and UCS to divert the path along the western edge of Alexandra Park to become the new spine through the Campus linking to the Waterfront • More should be done to promote cycling with better cycling maps and promotion in schools, the health section and workplaces • Seek introduction of safe segregated cycle contra flow lanes in the one-way system to shorten travel times.

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Chapter 9 Travel	Policy Area 53 The Wet Dock Crossing	9	2	The Ipswich Society, Suffolk County Council, R Nunn, UCS, Cycle Ipswich, Mersea Homes, Crest Nicholson	EERA, C Vint	<ul style="list-style-type: none"> • This is the single most important new road and the logical crossing would be to Bath Street – it would obviate the need or a roundabout and keep traffic out of the Island Site • There should be no vehicular traffic through St Peter’s Quay • The crossing should not wait for development of the Island site • This scheme is not supported by the local highway authority and no funding is being sought for it (SCC) • To relieve east-west congestion, improvements to the gyratory are implementable along with the approach set out in the LTP 2006-2011 and this should be articulated in the DPD (SCC) • If the Wet Dock Crossing does not come forward in the plan period, it raises questions about the development of the Island site for such intensive levels of use – it would need to be accessed from the western bank SCC) • The East Bank Link Road will not be built and therefore the Wet Dock Crossing is essential to provide an alternative east-west link – the route should be from Bath Street to Toller Rd crossing adjacent to the lock gates • Not opposed to a crossing in principle, but would need to be assured that it would not divert substantial volumes of traffic along Duke St as this would harm the environment of UCS • Managing traffic flows should be addressed as a top level issue across the whole document and the crossing should not be built • Demand management policies in the Ipswich Waterfront Transport Strategy & Ipswich Transport Strategy should be actioned urgently • There is no realistic prospect of the delivery of the crossing therefore it should be removed from the plan as it could

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						<p>blight land.</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Support in principle, but the link between delivery of the crossing and improvements to the Star Lane gyratory should be removed because there is uncertainty about the crossing's deliverability (e.g. it is dependent on development of the Island Site which itself depends on completion of the tidal barrier) • The DPD has not been tested in transport terms and the proposed approach is inconsistent with the recommendations of the Waterfront Transport Study
Chapter 9 Travel	Policy Area 54 Star Lane and College Street Gyratory	4	1	The Ipswich Society, Suffolk County Council, UCS, Crest Nicholson	C Vint	<ul style="list-style-type: none"> • As well as capacity reduction there should be demand reduction e.g more attractive footpaths • The suggestion of the traffic consultants should be followed as soon as the Wet Dock Crossing is in place (e.g. 2 way widened Star Lane with tree planting and Key Street as shared space) • Improvements to Star Lane are implementable together with the approach set out in the LTP and should not be dependent on additional capacity being provided (SCC) • Not opposed in principle to these works linked to a Wet Dock Crossing, but would not wish to see the crossing divert large volumes of traffic along Duke Street as it would harm the UCS environment – should use demand management methods also • Support the Star Lane improvements but object to the link to the provision of a wet Dock Crossing
Chapter 9 Travel	Policy Area 55 Public Transport Improve-	7	3	The Ipswich Society, R Nunn, Shearer Property Group Ltd, Cycle	UCS, EERA, Crest Nicholson	<ul style="list-style-type: none"> • Extend the shuttle bus, close the Old Cattle market bus station, stop some old diesel buses, make shuttles more frequent, and use the Felixstowe railway line for a more frequent commuter service provided perhaps by trams or

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	ments			Ipswich Crest Nicholson, C Vint		<p>electric trains</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Close the Old Cattle Market bus station and move to tower ramparts • Shuttle should link the station, town centre, Education Quarter and Waterfront • Remove buses from the access only part of Fore Street • Support many of proposals but any further alterations to Upper Brook Street and Upper Orwell Street would need careful consideration as to how this might impact on shoppers' ability to access the retail quarter • Promote bus travel and ensure that travelling into town by bus is cheaper and more attractive than coming by car • No information is provided on bus usage or cost – for many people cost is a deterrent • No information is provided about a possible new riverside route between the station and Stoke Bridge and the effect this might have on timings • No mention is made of quality partnerships or improved information • Attention should be given to improving the bus stop environment
Chapter 9 Travel	Policy area 56 Parking Strategy	7	0	The Ipswich Society, UCS, C Vint, Cycle Ipswich, Crest Nicholson, Sustrans, Shearer Property Group Ltd,		<ul style="list-style-type: none"> • Support strategy overall but concerned about increase in commuter parking spaces which would increase congestion at peak times • Street parking within the parking core needs an overhaul because there are inadequate spaces outside working hours and signage is poor • Need to increase the use of sustainable transport modes for short trips by restricting parking for all but disabled in IP1. • Object to the proposal to provide a 500 space multi-storey car park at Shed 7 as there is no reason why the University

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						<p>should provide public parking and it would add to congestion and fail to encourage modal shift (UCS)</p> <p>Cont 'd ...</p> <ul style="list-style-type: none"> • Object to lack of consideration of residents' parking • Council should tackle pavement parking • Provision of additional parking spaces is against national and regional policy to manage traffic demand • The proposal to reduce the central parking core to accommodate more long stay parking at the eastern quays only fits the Ipswich Transport Strategy if Star Lane/college St capacity is reduced and parking in the centre is reduced and the Wet Dock Crossing is not provided • Reducing parking charges will increase congestion • Object to increase in long stay parking provision on the edge of the town centre which will increase car journeys to the centre – should expand existing park and ride • The number of spaces indicated for the Mint Quarter should remain flexible until a scheme is fully developed
Chapter 10 Shop	Comments on and/or omissions from whole chapter	1	0	D Saunders,		<ul style="list-style-type: none"> • Ipswich Town Centre does not provide the same incentive to visit as do our neighbouring towns • Should encourage quality shops and high street names • There is inadequate parking in peak periods and parking charges are too high – parking should be free after 6pm • Park and Ride has been a success and provision of improved public transport service will become essential
Chapter 10 Shop	Policy Area 57 The Central Shopping Area Boundary	8	1	K Phair, The Ipswich Society, C Vint, Turnstone Estates, Cycle Ipswich, Sainsbury's Supermarkets	EERA	<ul style="list-style-type: none"> • Object to para 10.24 'that no provision has been identified for cyclist to access and pass through the area'. Aspiration for the Turret area should include provision for cyclists • Would prefer to see redevelopment of the town centre within a tighter more vibrant retailing zone – existing shopping areas are too spread out • Should redevelop the Old Cattle Market having relocated the

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				Ltd, Sustrans, Shearer Property Group Ltd		<p>bus station for mixed use incorporating a tree lined walkway to link the Waterfront and town centre</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Shopping should not spread north across Crown Street (more than 1 objector) • Fore St is missing and it is an important shopping street where small businesses can locate that help add to the range of shops available • Must expand the shopping area to accommodate the additional retail requirements identified in the Retail Study – particularly support westward extension to allow integration of the Civic Centre site into the central shopping area • Keep the existing central shopping area boundary to keep retail activity focused in a small area • The Mint Quarter and other sites within the existing centre provide enough opportunities to attract higher quality shops • Welcome allocation of the Mint Quarter for development • Future retail development should be phased with the Mint Quarter being the first site to take up some of the capacity identified by the Retail Study
Chapter 10 Shop	Policy Area 58 Primary, Secondary and Speciality Shopping Areas	5	4	The Ipswich Society, Suffolk County Council, C Vint, John Norman, Turnstone Estates,	EERA, Shearer Property Group Ltd	<ul style="list-style-type: none"> • Speciality Shopping Area should be expanded to include a redeveloped Old Cattle market • Not clear where in the document the district centres are allocated and the surrounding buffer zones (SCC) • Fore Street should be a speciality shopping area • Need to regroup into a tight central core with a diversity of attractors to save the town centre • Out of town superstores should be discouraged • The areas identified do not take account of the site specific retail proposals – the former Civic Centre should be identified as a primary shopping area
Chapter	Policy Area	3	1	C Vint, Sustrans,	EERA,	<ul style="list-style-type: none"> • Fore Street is a key link between the town centre and

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10 Shop	59 Waterfront Shopping			N Agran		<p>eastern Waterfront</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Safe cycle routes to shops that provide for everyday needs must be included in developer plans (para 10.40) • The policy approach to the Waterfront should be extended to the Turret Lane area to provide a retail link between the town centre and Waterfront • The size threshold seems somewhat arbitrary and not supported by evidence
Chapter 10 Shop	Policy Area 60 Site Allocations for New Retail Development	3	2	Peacock & Smith Ltd, Indigo Planning Ltd, Turnstone Estates	EERA, Shearer Property Group Ltd	<ul style="list-style-type: none"> • Object to foodstore allocation at 'Westgate' (former Civic Centre) as the Retail Study does not indicate a need for it (the study underestimates the performance of the Morrisons store and therefore overestimates remaining capacity) • Council should identify sites for bulky good retailing as not all types of retailing can be accommodated in the town centre • Support the allocation of the former Civic Centre but object to the residential element as it would be incompatible with office and retail uses (Turnstone) • Support allocation of the Mint Quarter (Shearer PG)
Chapter 11 Townscape	Comments on and/or omissions from whole chapter	1	0	EEDA,		<ul style="list-style-type: none"> • Council may wish to consider developing additional supplementary planning documents or design codes to support the AAP. Consultation with Inspire Ease and Cabe would be beneficial (EEDA) • Council should seek to apply the appropriate BREEAM and Code for Sustainable Homes ratings to new development in the IP-One area in line with RES Goal, priority 4 (EEDA)
Chapter 11 Town-	Policy Area 61 Environmen	1	1	Sustrans	EERA	<ul style="list-style-type: none"> • Object to para 11.18 - the disregard of the need for cyclists to have safe easy access from the Eastern Quays to Hollywells Park. National Cycle Route 51 uses a route

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scape	tal Improvements					through Hollywells Park and safe cycle links to and from the Merchant Quarter must be provided
Chapter 11 Town-scape	Policy Area 62 Green Space and Play	1	1	Mersea Homes	EERA	<ul style="list-style-type: none"> • Fail to demonstrate a unified approach to the development of a comprehensive green space network in IP-One – policy should acknowledge that urban space cannot be planned in isolation and link to policy areas 48 and 50 • The opportunity for a green or urban space network supporting cultural interest should be explored • Policy should provide guidance on the positive use of hard landscaped areas
Chapter 11 Town-scape	Policy Area 63 Urban Design Guidelines	1	2	CABE	The Ipswich Society, I McKie	<ul style="list-style-type: none"> • Need robust design policies • Treat design as a cross-cutting issue • Include adequate policy hooks on which to hang other design tools e.g. design guides and site briefs (standard Cabe response)
Chapter 12 Infra-structure	Comments on and/or omissions from whole chapter	1	0	Anglian Water Services		<ul style="list-style-type: none"> • Anglian Water would like to see the Water Cycle Study included in the list of reference documents • Upsizing of strategic sewers may be required if densification of brownfield leads to an increase in foul water flows in the city centre. The implementation of policies relating to water efficiency, SuDS and grey water recycling will help to mitigate this
Chapter 12 Infra-structure	Policy Area 64 Site for Ipswich Flood Barrier	0	1	-	EERA	<ul style="list-style-type: none"> • Policy is consistent with RSS Policy WAT4
Chapter 12 Infra-	Policy Area 65 Site for Town	1	0	Crest Nicholson		<ul style="list-style-type: none"> • Being essential infrastructure, this should not be located within flood zone 3 without the appropriate tests in PPS25 being passed

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structure	Centre Electricity Sub station					
Part C Opportunity Areas (All)	Comments on and/or omissions from whole section	3	0	GO East, Crest Nicholson, Sustrans, W D Coe Ltd, English Heritage		<ul style="list-style-type: none"> • It is not clear why the AAP does not articulate what the preferred policy options are for the opportunity areas (GO East) • The opportunity area maps are unclear, difficult to read and do not clearly indicate what the proposals for the areas are (GO East) • The opportunity area maps identify constraints but do not suggest how they might be overcome which raises questions of deliverability (GO East, Crest) • The submission document should set out the preferred option for the opportunity areas and explain how they will be delivered, including risks and contingencies (GO East) • Object to overall lack of traffic free cycle facilities. Needs to be changed to increase mobility within this confined area. • Object to the fact that no opportunity area covers St Matthews St and Norwich Road – no other shopping area is as poor in terms of local funding, and needs regeneration more - this would also improve a key artery into town. • Welcome the preparation of guiding principles for these areas of regeneration and change as precursors to the preparation of master plans for each area with detailed development briefs for some sites, especially the Merchant's Quarter, Mint Quarter, Education Quarter and Island Site (EH) • Principles for each area should be informed by in depth characterisation of the areas (EH) • There are inconsistencies with e.g. a building identified as a landmark on one map but not on another (EH) • Frontages with positive character and important vistas seem rather arbitrary (EH) • Should identify where focus points and areas of taller

Chapter	Policy Area / Page / para. / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Key Objections issues raised
						buildings should be placed (EH)
Part C Opportunity Areas	A Island Site	3	0	The Ipswich Society, Associated British Ports, Environment Agency		<ul style="list-style-type: none"> • Have the old lock area as a public space with historic interpretation. • Landmark building in this area • Wet Dock Crossing to Bath Street rather than Mather Street and no roundabout • Reduce and move yacht moorings to south end of dock • The development of the Island site should not be unduly constrained by intended heights of the buildings. • A degree of flexibility needs to be provided to deliver this site because of the changing housing market and site development costs • There is no evidence that a tree lined promenade existed, therefore object to large scale tree planting because roots could affect the stability of the Island walls and licit wit marina operations • Agree some form of small-scale attraction is appropriate, but would not wish such a facility to sterilise any part of Island site to provide yet further constraint on its redevelopment. • Pedestrian/Cycle bridge between Stoke Quay and New Cut East is badly positioned as it will restrict the existing vehicular access onto the site. There is also a high voltage cable in this location. The bridge should be further south east or north west. • The extent of tree planting shown will be impractical and not easily related to intended uses – some will coincide with location of high voltage cable and others conflict with marine operations. • Public park o northern neck of island is badly sited – several smaller pocket parks would be better for permeability • Wish to see major hotel facility on Island site to assist in regeneration

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						<p>Cont'd ...</p> <ul style="list-style-type: none"> • Favour cycle and pedestrian access across the lock gate provided there is no interference with the operation of the gate and navigation rights – ditto the footbridge across the New Cut (EA)
Part C Opportunity Areas	B Merchant Quarter	3	0	The Ipswich Society, Sustrans, W Hammond		<ul style="list-style-type: none"> • Support Option B but it is not clear what redevelopment is proposed for the bus station • No mention of cycle provision – it should include specific cycle desire lines • This is a pivotal location – the bus station should be redeveloped as a landmark tower with restaurant and viewing gallery to provide a link between the Waterfront and town centre
Part C Opportunity Areas	C Holywells	3	0	The Ipswich Society, Sustrans, Associated British Ports		<ul style="list-style-type: none"> • Object to large public car park on dock side – wish to see a promenade • Support Opportunity Area C but the cycle provision must be of the highest quality • Support suggestion to promote redevelopment of former shipyard as a destination but should add 'at the appropriate time' (ABP) • Object to reference to reducing the impact of port related traffic as Cliff Rd provides the main access into the most active area of the port and traffic uses it at all hours – to constrain this access would affect the viability of the port (ABP) • If in future funding is found for an East Bank Link Rd we would support this as an alternative access (ABP) • Object to the re-siting of the control point to the south and the location of a public car park in the area which could compromise port security and safety (ABP)

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Part C Opportunity Areas	D Education Quarter	4	0	UCS, Sustrans, Associated British Ports, R Huq		<ul style="list-style-type: none"> • Object to the proposal for a 500 space public car park provided on the site – some parking will be provided on site primarily to serve the needs of University students and staff, but this will be limited in line with the travel plan (UCS) • The Education Quarter Transport Study states that there should be no more than 846 parking spaces in the Education Quarter (UCS) • The need for public parking was not raised by the Council when the study was commissioned nor in connection with the Phase 1 planning application (UCS) • Some of the proposed parking could be available for visitor use when the University is closed (UCS) • Object to lack of cycle provision – the spine route should be for cycles also, and cycle routes need to be defined and engineered within the Campus and between it and other destinations • The Opportunity Area proposals fail to address the absence of residents' daytime parking for 25-37 Fore Hamlet – parking should be provided (R Huq & 6 name petition) • Object to the addition of traffic lights or road marking where they could restrict parking further or cause access problems (R Huq & 6 name petition) • Object to proposed access path between Back Hamlet and Fore Hamlet if any vehicular use is planned (R Huq & 6 name petition) • Disagree with identified key view identified on constraint map and suggest that the view from Coprolite Street towards the Old Custom House has greater significance • Concerned about suggested tree planting over the water and request that it is removed

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Part C Opportunity Areas	E "Over Stoke Waterside"	1	1	Sustrans	Messrs Websters	<ul style="list-style-type: none"> • Support Opp Area E – National Cycle Route 1 uses it as its principal gateway into Ipswich – but cycle provision should be of the highest standard if it is to become a major cycle commuter route into town • Support cycle/ped bridge but concerned that current one way system along New Cut and Dock St needs to be revoked – adequate cycle provision needs to be planned and provided between Wherstead Rd and the Bridge St/Stokes St junction
Part C Opportunity Areas	F Riverside West	3	0	Sustrans, Applekirk Properties Ltd, Suffolk County Council		<ul style="list-style-type: none"> • Support in principle but concerned that width of proposed bridge does not meet necessary standards for shared use with pedestrians • IBC should refer to national standards in planning such facilities • The development opportunity mix should be amended to reflect the current commercial nature of the site occupied by units 3-6 Orwell Retail Park – the residential bias is neither deliverable nor realisable and a mixed use scheme based on retail, small scale district centre B1 employment and a little residential is more appropriate • Proposed cycleway in Opportunity Area F (SCC)
Part C Opportunity Areas	G River Corridor	4	1	The Ipswich Society, Sustrans, The Riverside Group, Spenhill Regeneration Ltd		<ul style="list-style-type: none"> • Strongly support the riverside strip but east connection needs to be made to Princes Street Bridge and the old railway bridge should be used as well • Strongly object to redundant rail area being used for public transport as for many years Sustrans has been working with the River Action Group to develop the goods yard as a green corridor with a cycle route • Object to protection of view of St Mary Stoke Church which

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						<p>will reduce the scaling of development on the river front near the building thus affecting viability</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Object to suggested mix of uses on north side of river – delete reference to use of rail line as new public transport corridor and include support for an increased scale of development
Part C Opportunity Areas	H Ipswich Village West	1	1	Her Majesty's Court Service	The Ipswich Society	<ul style="list-style-type: none"> • Would like to see Ipswich Village and in particular the area around Russell Road developed into a formal Civic Quarter together with further development around the area happening in a strategic and spatial manner • Sites UC015, UC059, UC063, UC104 and UC271 – do not object to mixed use development provided they relate well to the existing and any new civic buildings and uses as part of an emerging Civic Quarter
Part C Opportunity Areas	I Portman Road	1	2	Sustrans	The Ipswich Society, Peacock Short Ltd,	<ul style="list-style-type: none"> • Support, but it is important that National Cycle Route 51 which passes through this area is protected and enhanced by any future development
Part C Opportunity Areas	J Westgate	2	1	Sustrans, Turnstone Estates	Her Majesty's Court Service,	<ul style="list-style-type: none"> • Lack of proposed cycle provision in this area – cycle lanes on Civic Drive are too narrow alongside wide footways that could be converted to shared use • Support the redevelopment of the former Civic Centre but object to the prescriptive development principles, especially in relation to the residential element – the proposal has not been discussed with the landowner which raises doubt about its soundness and deliverability • Unclear about the status of the opportunity area maps
Part C Oppor-	K Mint Quarter	3	0	Sustrans, Shearer Property		<ul style="list-style-type: none"> • Welcome inclusion in the area of the Regent and Odeon site as part of wider regeneration, but these are not vital to the

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tunity Areas				Group Ltd, Christ Church United Reformed/Baptist Church		<p>delivery of the Mint Quarter scheme nor should they be seen as a requirement in any scheme</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • The wording in italics should be identified on a plan in order to ensure a comprehensive approach to the Mint Quarter • There is no direct mention of the needs of cycling within this Opportunity Area – should include specific cycle routes and route standards • Opportunity Area K public realm map respects the graveyard but not the church halls – amend the boundary.
Part C Opportunity Areas	L Crown Street	4	0	The Ipswich Society, Sustrans, W J Hammond, Shearer Property Group Ltd		<ul style="list-style-type: none"> • Object to proposals for Crown Street • Role of NCP car park needs to be seriously considered and should not be zoned for building of any sort – could provide extension to bus station • Object to lack of proposed cycle route in Opportunity Area L, especially as the area is such an important recreational, leisure, retail and transport interchange • If existing Tower Ramparts bus station cannot accommodate increased traffic, use part of site UC224 (NCP car park) for out of town buses and for servicing to the shops
Chapter 13 Delivery Plan	13.1 – 13.4	2	0	Go East		<ul style="list-style-type: none"> • It is not clear what the end date of this DPD is. Para 2.8 of PPS12 requires that the date is clearly stated • Whilst we note that table D1 includes short/medium/long term timescales, we would expect the Submission document to be much clearer as to the timeframe of the DPD's policies and include such information in the early introductory chapters • Pleased to see beginnings of an implementation framework. However expect to see this further developed in the submission DPD by setting out what flexibility is built into proposals if certain matters don't progress as expected • The delivery framework should also cover risks to delivery

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						and possible contingencies measures
Chapter 14 Monitoring Framework		0	0			No comments received
Appendix A	General comment	2	0	Suffolk County Council, GO East		<ul style="list-style-type: none"> • Sites should be allocated in terms of what would provide the best opportunities for achieving the principles of sustainable development as set out in PPS1 and RSS (SCC) • The Suffolk School Reorganisation Review and Building Schools for the Future programme may have implications for the future use of some education sites in Ipswich (SCC) • The proposals map currently includes sites outside IP-One and these should be deleted to avoid confusion (GO East) • The Proposals Map should identify the 4 distinct areas of activity referred to in paragraph 2.3 (Central Shopping Area, Ipswich Village, Waterfront, and Education Quarter) and the 12 opportunity areas§ (GO East)
Appendix A	UC001 Land between 91-97 Fore Street	3	0	Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council		<ul style="list-style-type: none"> • Issues with access • Listed buildings on site. • Within Area of Archaeological Importance, Air Quality Management Area, Conservation Area and Floodplain • Absence of evidence of site's availability for housing
Appendix A	UC002 Handford Road (east)	4	4	Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council	Greenways Countryside Project, The Ipswich Society, River Action	<ul style="list-style-type: none"> • Site within flood zone 3, and ground water source protection zone II and major aquifer zone HU. • Impact of development on Alderman Canal and Nature Reserve • If developed should be at medium density • Number of houses proposed is unlikely to be more valuable

					Group, Inland Waterways Association	<p>than existing use when affordable housing and flood mitigation taken into account.</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Site should be retained due to need for employment sites to meet job targets. • Existing use value is considerable. • Flood risk issues are likely to require buffer zone which would reduce proposed densities. • Increased densities would require razing of levels closer to Handford Road making site unviable in cost terms.
Appendix A	UC003 Sir Alf Ramsey Way / West End Road	7	3	Environment Agency, Sustrans, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council, Henry Cooper	Greenways Countryside Project, Inland Waterways Association, River Action Group	<ul style="list-style-type: none"> • Density of housing proposed will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site at very low level and situated within flood plain. • Replacement household waste recycling centre would need to be provided. (EA) • Replacement would help drive forward the recycling of municipal waste. (EA) • Need for provision of cycle routes linking to recreational ground and national cycle route 51. • In conjunction with 40% affordable would not be viable at current sales rates. • Much reduced housing density may be viable but will be unlikely to achieve the receipt required to relocated existing uses. • There would be a requirement for safe pedestrian access to town centre. • If possible, small employment uses should be expanded on to the RMC site to provide opportunities for new small businesses. • Site provides valuable community and employment uses, uncertain of availability and deliverability.
Appendix A	UC004 Sir Alf Ramsey Way / West	5	0	Henry Cooper, Mersea Homes, Crest Nicholson,		<ul style="list-style-type: none"> • Objection to the proposed density of housing, will bring intolerable demands on road infrastructure, health service, schools, police and emergency services.

	End Road			David Wilson Homes, Suffolk County Council		<ul style="list-style-type: none"> • Site situated within the flood plain. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Extend employment use, consider industrial use. • 50/50 housing and employment split seems plausible, but high density apartments cannot work at 40% affordable. • Access issues into the former Harris meats site and cost implications of relocation. • Need to ensure safe and convenient pedestrian access to/from the site due to surrounding busy urban roads. • Proposed development would leave Harris Bacon Factory site vacant. • Delivery of housing on this site has not considered implications of PPS25. • On this site a bund in a floodplain could have the effect of increasing the risk of flooding elsewhere. • Site provides valuable community and employment uses.
Appendix A	UC006 Co-op Warehouse, Paul's Road	5	2	East of England Cooperative Society, Mersea Homes, Crest Nicholson, David Wilson Homes, Pauline Walker, P.A. Finbow, Suffolk County Council	Windsor Clarke Brackenbury Ltd, Crest Nicholson	<ul style="list-style-type: none"> • Site allocation should be changed to 100% high density housing. • Confusion over why adjacent Ranelagh School Site has 100% residential allocation and this site does not. • Co-op Juniors occupy top floor of Co-op Warehouse and development would remove community orientated facility. • Concern that existing uses of site have not been properly considered.
Appendix A	UC007 Ranelagh School, Paul's Road	4	0	Suffolk County Council Mersea Homes Crest Nicholson David Wilson Homes		<ul style="list-style-type: none"> • An alternative site with at least 5 acres within the school's catchment should be identified to accommodate pupil forecast. • Need to relocate the school and teachers centre. • Site within Ground Water Protection Zone II • Environmental Impact of adjacent railway marshalling yard. • Proposed 18 dwelling will not generate sufficient funds to enable development of site.

Appendix A	UC011 Smart Street / Foundation Street	5	0	The Ipswich Society, Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council		<ul style="list-style-type: none"> • Site situated within flood plain, conservation area, tree preservation orders on site, within area of archaeological importance and air quality management area. • Issues with site access onto Star Lane. • Change allocation of site to employment to support increased in population that more houses will bring. • Proposed density of housing will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Relocation of existing bus depot would be costly. • Possibly difficulties in accommodating 10% open space requirements.
Appendix A	UC012 Peter's Ice Cream, Portia Engineering and TGWU Offices, Grimwade Street	3	0	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes		<ul style="list-style-type: none"> • Proposed density of housing high. • Extend leisure use of site or retain industry. • Proposed density of housing, will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Relocation of Portia Engineering and TGWU offices proving problematic, unable to achieve this in the past. • Reduce density proposed to 25 units to incorporate associated uses. • Site within conservation area, tree preservations orders on site, within an area of archaeological importance and air quality management area.
Appendix A	UC014 Orwell Church	2	0	Mersea Homes, Crest Nicholson, David Wilson Homes		<ul style="list-style-type: none"> • Site cannot achieve proposed density due to sales rates achievable in view of the Fairway scheme and build cost.
Appendix A	UC015 West End Road Surface Car	6	3	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson	Greenways Countryside Project, Inland	<ul style="list-style-type: none"> • Proposed density of housing, will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site situated within the flood plain, listed buildings on site,

	Park			Homes, Her Majestys Court Service Suffolk County Council	Waterway Association, River Action Group	<p>within ground water protection area.</p> <ul style="list-style-type: none"> • Extend employment use multi-storey car park. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Delete plan for housing due to need for industry to support increase in population that housing would bring. • Deliverability constrained by need to retain car park and major electricity cable running along site. • Existing use values make alternative uses more attractive.
Appen- dix A	UC029 Land west of Greyfriars Road	4	0	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, PRUPIM		<ul style="list-style-type: none"> • Proposed density of housing, will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • The existing use value of the site outstrips the potential for residential. • Jewsons have refused to relocate on a number of occasions. • Approach to development of site is too rigid to facilitate its redevelopment. • Difficulty in accommodating 10% open space at density proposed. • Most appropriate occupier would be retention as employment or redevelopment for leisure to link well with adjacent cinema and nightclubs and increase leisure offer in the locality.
Appen- dix A	UC032 103-115 Burrell Road	4	2	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council	East of England Cooperative Society, River Action Group	<ul style="list-style-type: none"> • Proposed density of housing too high, represents 4 times the surrounding level. • Site is situated within the flood plain. • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Western half of the site is fully let and owner has stated it is unlikely to come forward for development. • Difficulty in accommodating requirement of 10% open space.

Appendix A	UC036 Key Street / Star Lane / Burton's Site	1	1	Henry Cooper	Crest Nicholson	<ul style="list-style-type: none"> • Site situated within the flood plain. • Retain small scale retail / food and drink. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Increase car parking and / or employment. • Improve cross town route, add more lanes not less.
Appendix A	UC037 No 7 Shed, Orwell Quay	7	0	University Campus Suffolk, Mersea Homes, Crest Nicholson, David Wilson Homes, Associated British Ports, Suffolk County Council, Paul Magnus – Orwell Lady Henry Cooper		<ul style="list-style-type: none"> • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site situated in flood plain, no houses should be considered until flood barrier is built. • Site within conservation area and area of archaeological importance. • Development would remove car parking at the Waterfront for customers, visitors, tourists etc. • Site should have an educational emphasis. • Difficulty in accommodating the requirement of 10% open space. • Precautionary approach to development of the site should be taken due to flood risk.
Appendix A	UC038 Island Site	10	2	Environment Agency, Mersea Homes, Crest Nicholson, David Wilson Homes, Associated British Ports, Suffolk County Council, Henry Cooper, A.M. Hunter	Greenways Countryside Project, Inland Waterways Association	<ul style="list-style-type: none"> • Site situated within flood plain. • Site adjacent to conservation area, within area of archaeological importance and area of air quality management. • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Serious traffic issues around the only access point to the site. • Additional access and egress would be required with this development. (EA) • Unconvinced that the site is a unique and desirable location

					<p>for housing given that site is working dock area. (EA)</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Unconvinced that it is rational to disregard flood risk on basis of location being considered unique and desirable. (EA) • Further details required of strategic bund and how this may impact New Cut locality. (EA) • Evidence will need to be provided to demonstrate Sequential Test has been carried out due to flood risk. (EA) • Obligations to provide affordable housing at 40% and increased build costs combined with site constraints make site unviable. • Concern that residential allocation will favour expensive properties which will not help meet housing shortage. • Site forms significant part of working operational port, which creates a great deal of income for the area. • Concern that proposed uses are likely to sterilise site and undermine viability of redevelopment. • Policies for development should not be prescriptive, over-elaborate or potentially so costly. • Development proportions should be 60% housing, 25% employment and leisure, 5% small scale retail and cafes, and 10% open space. • Need for significant pedestrian and cycle access improvements to integrate site into the rest of the town. • Need for piling due to the load exerted by development, this will increase construction costs. • Flood defences failed on site in 1996 and 2004, therefore proposed numbers of homes should be reconsidered. • There are claimed/deemed rights of way N-S along the quayside on opposite sides of both waterways (SCC) • There is scope for pedestrian/cycle links over the river and onto the site at both ends (SCC) • Site should not be allocated because of uncertainty over its delivery (for reasons of flooding, access and development costs)
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Appendix A	UC039 Land between Vernon Street & Stoke Quay	2	2	Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council	Crest Nicholson, Messrs Websters	<ul style="list-style-type: none"> • Rights of way abut and cut through the site Cont'd ... <ul style="list-style-type: none"> • Site has consent for 351 dwellings
Appendix A	UC040 Land between Vernon Street and Stoke Quay	3	2	Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council, Henry Cooper	R.W. Bond, Messrs Websters	<ul style="list-style-type: none"> • Incorporate Webster's sale yard into site UC040 as the yard does not currently enjoy planning permission, but allocation should not require comprehensive approach with UC040 • Delivery of development difficult due to relocation required of existing viable uses. • Site currently fully occupied by employment uses. • Employment use should be retained and enhanced to meet RSS14 targets. • Site within flood plain, listed buildings on site, within area of archaeological importance, and air quality management area. • Number of proposed flats unviable due to already flooded market. • Proposals for flats inconsistent with Environment Agency's approach to flooding. • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services.
Appendix A	UC041 Civic Centre Area / Civic Drive	6	2	Turnstone Estates, Spenhill Regeneration Ltd, Suffolk County Council	Mersea Homes, Crest Nicholson, David Wilson Homes	<ul style="list-style-type: none"> • Majority of the site will be developed for retail and other uses, therefore prescriptive number of residential units would not be compatible. • Difficulty of accommodating 24 residential units in a large scale redevelopment. • Residential development may hinder the creation of a suitable retail offer. • Site should be included in secondary shopping designation to afford significant policy protection. • Site not appropriate location for convenience food shopping. • Site is too small and constrained by surrounding

						<p>development and the sloping site to offer a viable food store location.</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • Large food store would be in format of Single storey large shop which Council wish to avoid. • Site space still insufficient even if combined with adjoining UC042 site. • Proposed option of accommodating a number of comparison goods retailers would offer more urban design opportunities. • Food store would not enhance town centre's role as a regional shopping centre.
Appendix A	UC042 Civic Centre Area / Civic Drive	6	0	Henry Cooper, Environment Agency, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council		<ul style="list-style-type: none"> • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Ipswich Police Station should not be relocated to within the tidal flood plain due to the need to remain operational during any flood event. (EA) • Residential scheme on this site likely to have a questionable viability with alternative uses seeming more attractive in this location. • Location of development more appropriate for town centre retail, office and community uses. • Listed buildings on site and within conservation area.
Appendix A	UC043 Land between Cliff Quay & Landseer Road	2	2	John Field Consultancy, Suffolk County Council	Savills, Crest Nicholson	<ul style="list-style-type: none"> • No real interest in developing site for office use resulted from exhaustive marketing exercise. • Potential odour issue following refusal of application.
Appendix A	UC044 Commercial Buildings and Jewish Burial Ground,	1	1	Mersea Homes, Crest Nicholson, David Wilson Homes	Crest Nicholson	<ul style="list-style-type: none"> • Site already has planning permission.

	Star Lane					
Appendix A	UC045 South of Mather Way	4	0	Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council		<ul style="list-style-type: none"> • Difficult to see housing forming a significant part of redevelopment as presently a car park. • Site situated within flood plain and within area of archaeological importance. • Site has poor access to shops and services. • Strong pedestrian and cycle connection would be required if developed. • Site currently a car park; redevelopment would have severe impact on Felaw Maltings offices. • Potential requirement for safe access and ground raising due flood risk, which could cause flooding problems elsewhere. • Difficulty in accommodating open space requirements of 10%. • Site represents potential for continued employment and mixed commercial uses, alongside other retained employment uses in this area of the waterfront.
Appendix A	UC046 Holywells Road (west)	5	1	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council	Greenways Countryside Project	<ul style="list-style-type: none"> • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site situated within flood zone. • Retain present use as industry in Ipswich is disappearing and is needed to support increased in population that more housing will bring. • Existing use values make residential on the entire site debatable. • Interested parties from current marketing are employment use orientated. • Current values for employment uses will result in the need for a high density apartment scheme which would not be viable at today's date. • Requirement for strong pedestrian and cycle links and improved bus service.

						<ul style="list-style-type: none"> • Difficulty in accommodating open space requirements of 10%. <p>Cont'd ...</p> <ul style="list-style-type: none"> • In view of RSS14 employment targets, sustainable location and successful occupancy rate site should be retained as existing use. • Site performs important commercial role.
Appendix A	UC047 Wolsey Street	3	0	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes,		<ul style="list-style-type: none"> • Site situated within the flood plain and only suitable for less vulnerable development even with defences. • Floor levels need to be much higher than adjacent road due flood risk, safe access may not be possible • Within area of archaeological importance. • Introduce entertainment, offices, employment, café - industry in Ipswich is disappearing and is needed to support increased in population that more housing will bring. • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site owned by Willis Coroon and is required as surface car parking. • Current uses surrounding site have potential to have significant impact on environment of site e.g. noise at antisocial hours. • Difficulty in accommodating open space requirements of 10%.
Appendix A	UC048 Commercial Road	10	1	Greenways Countryside Project, River Action Group, Network Rail, Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes,	Inland Waterways Association,	<ul style="list-style-type: none"> • Open space proportion should be 30% • Retail use should not be excluded from development. • Proposed mix of uses and suggested proportions of land use is inappropriate. • Conflicting approach between development of UC048 and adjacent sites UC015 and UC089. • Development should not include reference to provide public transport corridor through the site, no justification of need for off road bus lane, this would conflict with other uses.

				Jones Lang LaSalle, Spenhill Regeneration Ltd, Suffolk County Council		<ul style="list-style-type: none"> • Bus lane would not optimise use of riverside setting. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Higher value land uses needed to ensure proposals are commercially viable. • Three separate sites as shown in Issues and Options stage should be reinstated. • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site situated within the flood plain. • Site situated within conservation area. • Safe, convenient pedestrian / cycle access across Commercial Road would be required. • Retain existing use as industry in Ipswich is disappearing and is needed to support increased in population that more housing will bring. • Existing site use makes it extremely difficult to undertake comprehensive redevelopment. • Network Rail have not agreed to release this land to date. • There should be an increase in the flexibility for size and scale of the development in this riverside location. • Delete reference to leisure, employment and bus lane, do not specify number of dwellings - wide range of uses proposed serve no effective planning purpose. • Open space / recreation should be indicative and acknowledge that riverside path may contribute towards target of off site provision. • There should be greater emphasis in proposals for the potential phasing of development. • Should exclude residential from the mix because of uncertainty about delivery. • Right of way abuts site (SCC).
Appendix A	UC051 Mint Quarter	11	2	East of England Cooperative Society Ltd,	City Grill, Shearer Property	<ul style="list-style-type: none"> • Area covered by the allocation should be extended to cover the whole of land owned by the East of England Co-

			Henry Cooper, Christ Church United Reformed/Baptist Church, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council	Group Ltd	<p>operative Society.</p> <p>Cont'd ...</p> <ul style="list-style-type: none"> • This would enable greater integration into the overall concept, in particular for architectural, servicing and pedestrian integration purposes. • Inclusion of extra land would allow for greater flexibility for comprehensive redevelopment of the site. • Density proposed will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Proposed development should not include Christ Church graveyard, Church House and Christ Church Halls. • Development of this site would be disrespectful of setting and would not enhance it. • TPO's and historic monuments on site. • Development of site would remove scarce and valuable open green area. • Construction of high buildings would blight the enjoyment and use of the Church. • Removal of Christ Church Halls would result in loss of accommodation for community activities. • Site hindered by the land values for car parking in the vicinity. • Difficulty in turning many retail users onto the site instead of Carr Street and Upper Brook Street. • Any residential development will not exceed land values, therefore development dependent on a retail scheme. • Number of car parking spaces proposed should remain flexible until scheme is fully developed. • Site situated within flood zone, conservation area and area of archaeological importance. • Existing uses on the site provide an important function, development would require agreement between many different landowners.
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Appendix A	UC052 No 8 Shed, Orwell Quay	3	1	Henry Cooper, Crest Nicholson, Suffolk County Council	Mersea Homes, Crest Nicholson, David Wilson Homes	<ul style="list-style-type: none"> Proposed density of houses too close to the town centre and will bring intolerable demands on road infrastructure, health service, schools, police and emergency services <p>Cont'd ...</p> <ul style="list-style-type: none"> Site situated within flood plain and conservation area. Requirement for strong pedestrian / cycle links and possibly an improved bus service due to location. Difficulty in accommodating 10% open space requirements. Residential development in this location is contrary to current flood policy.
	UC053 Land west of New Cut, south of Felaw st	5	0	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council, JB Planning Associates		<ul style="list-style-type: none"> Site situated within the flood plain and conservation area. Proposed density of houses too close to the town centre and will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. Flood barrier would be required for delivery of site. Mitigating the flood risk would require ground razing. Difficulty in accommodating 10% open space requirements. Area represents potential for continues employment and mixed commercial uses alongside other retained employment uses in this area.
Appendix A	UC054 Old Cattle Market Site, Portman Road	3	1	Henry Cooper, Beeson Properties Ltd, Crest Nicholson, Suffolk County Council	Mersea Homes, Crest Nicholson, David Wilson Homes	<ul style="list-style-type: none"> Proposed density of houses too close to the town centre and will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. Site situated within the flood plain, flood barrier would be required for delivery of site. Mitigating flood risk would require ground razing. Proposed density of houses too high and too close to town centre. Proposals should include reference to Portman House. Comprehensive redevelopment of site is unlikely to be viable given the proposed mix of uses. Safe access is difficult due to flood zone location. Leisure centre inappropriate as majority of water leisure facility users are not car drivers, therefore should not move

						<p>away from existing Crown Street site.</p> <ul style="list-style-type: none"> • Development costs do not add up so unlikely that developer will be found. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Crown Pools should be regenerated instead, Fore Street pool site should be sold off and funds used for regeneration.
Appendix A	UC055 Land between Lower Orwell Street & Star Lane	5	1	The Ipswich Society, Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council	Bullworthy Shallish LLP	<ul style="list-style-type: none"> • Land should be obtained from this site to ensure adequate width for Star Lane. • Proposed density of housing too close to town centre. • Proposed density of houses too close to the town centre and will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site situated within flood plain. • Site within conservation area, listed building on site and within air quality management area. • High quality pedestrian environment to/from/within the site would need to be provided due to site location adjacent to Star Lane. • Local traffic flows and carriageway geometry mean site access directly onto Star Lane may not be achievable. • Alternative access onto Lower Orwell Street would have operational and safety issues. • Site dependent on improvements to Star Lane. • Difficulty in accommodating 10% open space requirements.
Appendix A	UC056 Orwell Retail Park, Ranelagh Road	6	3	Henry Cooper, Firstplan, Orwell Motorcycles Ltd, Mersea Homes, Crest Nicholson, David Wilson Homes, JB Planning Associates	Greenways Countryside Project, Inland Waterways Association, River Action Group	<ul style="list-style-type: none"> • Site situated within flood plain. • Proposed density of housing too close to town centre. • Proposed density of houses too close to the town centre and will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Original use should be retained, especially highly successful Orwell Motorcycles. • Industry / employment is disappearing and the economy needs to be supported with increasing population. • Preferred option should recognise existing uses already on

						<p>the site.</p> <ul style="list-style-type: none"> • Severe constraints on site with regard to flooding and residential issues. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Existing use or non-residential use would present less flood risk issues. • Proposals are in contrary to the councils pledge to 'Benefit Existing Businesses'. • Location of site between rail line and river therefore creating difficult pedestrian movement north-south and potential poor access to bus services. • Site availability unlikely due to long leases. • Site performs / has potential to perform a valuable retail operation in preferable edge of centre location.
Appendix A	UC057 Land between Old Cattle Market & Star Lane	13	6	The Ipswich Society, Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Archant Properties Ltd, Nick Palmer on behalf of Mr N Agran	C A Wall, Nick Palmer on behalf of Mr N Agran	<ul style="list-style-type: none"> • Land should be obtained from this site to ensure adequate width for Star Lane. • Site situated within flood plain. • Site within conservation area, listed building on site and within an area of archaeological importance. • Difficulty in accommodating 10% open space requirements. • Proposed density of housing too close to town centre. • Proposed density of houses too close to the town centre and will bring intolerable demands on road infrastructure, health service, schools, police and emergency services. • Retain original use, especially EADT offices and print works, consider more office use. • Industry / employment is disappearing and the economy needs to be supported with increasing population. • Variety of piecemeal ownerships exist which will limit the ability to deliver the site. • Council should take a more flexible approach to redevelopment proposals. • Archant should retain some flexibility with the operational nature of the site from a commercial perspective. • Perceived significant apartment growth on this part of the

						<p>town may well challenge market demand.</p> <ul style="list-style-type: none"> • Southern extent of site will require flood protection. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Size and operational requirements for a sub-station would run counter to the aims of improving townscape and character. • Site subject to flood risk therefore inappropriate for sub-station location. • Onus should be on EDF Energy to find a site. • Identification of site is not backed up by site-specific evidence. • Provision for retail should be included in proposals. • Site within an Air Quality Management Zone
Appendix A	UC058 Crown Street Car Park Site	6	0	Sport England, Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council		<ul style="list-style-type: none"> • No specific replacement site for the Crown Pools complex has been identified. • Alternative suitable site required to be allocated for replacing the swimming pool facility prior to any development. • Finding a replacement site for a major leisure facility in a town centre can be difficult in practice due to size and accessibility requirements. • More living accommodation in town centre will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Although car park is in poor state of repair it's use is economic and can be continued on this site. • Site is located within air quality management area.
Appendix A	UC059 Russell Road / Princes Street / Chancery Road	1	1	Her Majesty's Court Service	Crest Nicholson	<ul style="list-style-type: none"> • Development should relate well with the existing and any new Civic buildings. • Would like to see further development around Russell Road encapsulating a number of adjacent development sites in a strategic and spatial manner.
Appendix A	UC060	0	1		Crest	<ul style="list-style-type: none"> • Support employment.

dix A	Princes Street / New Cardinal Street				Nicholson	
Appendix A	UC063 Fison House	3	2	Her Majesty's Court Service	The Ipswich Society, Crest Nicholson, Suffolk County Council	<ul style="list-style-type: none"> • Development should relate well with the existing and any new Civic buildings. • Would like to see further development around Russell Road encapsulating a number of adjacent development sites in a strategic and spatial manner.
Appendix A	UC067 Holywells Road (east)	5	2	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes Suffolk County Council	Greenways Countryside Project, FIS Windows Ltd	<ul style="list-style-type: none"> • Site situated within the flood plain. • Site within conservation area. • Strong bus / pedestrian / cycle links to town centre would be required due to distance. • More living accommodation in town centre will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Relocation of many of the existing uses is unviable in cost terms. • Current use as existing industrial estate is fully occupied. • Difficulty in accommodating 10% open space requirements.
Appendix A	UC071 Truck and Car Company, Cliff Road	5	1	Suffolk County Council, Mersea Homes, Crest Nicholson, David Wilson Homes, Associated British Ports	Cliff Road Developments Ltd	<ul style="list-style-type: none"> • Site located in an area where there is traffic congestion. • Site located in flood plain. • Strategic bund would still be required for safe access even with tidal barrier. • Development could add significantly to the need for school places. • Accumulation of these developments may have implications given the limited site of Holywells High School. • Site location adjacent to one of the two primary accesses into the Port of Ipswich – redevelopment should not compromise access. • Although site has extant planning permission, deliverability still questionable since the scheme has not been developed in past 4 years.

						<ul style="list-style-type: none"> • Present commercial use has reached levels that exceed residential value of the site. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Part of site may be required for wet dock crossing. • Site located in poor residential location.
Appendix A	UC072 Crown House, Crown Street	6	0	Suffolk County Council, Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, JB Planning Associates		<ul style="list-style-type: none"> • Site should be considered in conjunction with site S058 and other town centre sites as it is of strategic importance to Ipswich Town Centre. • Requirements of the East of England plan policy E2 should be taken into account prior to considering any other uses on site. • Further discussion recommended on this site being beneficial for supported housing. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Existing offices on site are almost fully let, commercially successful and in good location. • Site situated within air quality management area. • Limited potential to redevelop site as office accommodation is of good quality, in excellent location and there is a need to provide additional office jobs in Ipswich. • Any redevelopment would increase pressure within the town centre for delivery of high quality office space. • Site already performs positive employment role.
Appendix A	UC074 Orwell Quay	4	1	Suffolk County Council, Waterfront Churches, Associated British Ports	Crest Nicholson	<ul style="list-style-type: none"> • Site best utilised to provide circulation space for a high density development area and a high quality public realm for the whole quayside area. • Site located in traffic-congested area with poor air quality. • Site more suited to open space and leisure use. • Sympathetic planning and development required to make the site a vibrant area. • 40% of site should be given over to a two or three storey

						<p>retail/restaurant/café type use at the northern end and the remainder used as car parking/open space.</p> <ul style="list-style-type: none"> • Possible issue over historic width. <p>Cont'd ...</p>
Appendix A	UC075 St Edmund House, Rope Walk	2	2	Henry Cooper, Suffolk County Council	Suffolk County Council, Sustrans	<ul style="list-style-type: none"> • Office or retail use preferable. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services.
Appendix A	UC078 Church/land at Upper Orwell St	1	1	Mersea Homes, Crest Nicholson, David Wilson Homes	David Barker on behalf of Crest Nicholson	<ul style="list-style-type: none"> • Already has planning permission.
Appendix A	UC082 Drunken Docker Area	1	2	Associated British Ports	Crest Nicholson, Suffolk County Council	<ul style="list-style-type: none"> • Site should be considered comprehensively in conjunction with neighbouring land when development is being considered.
Appendix A	UC085 240 Wherstead Road	3	2	Suffolk County Council, Henry Cooper, Wherstead Road Residents Association	Mersea Homes, Crest Nicholson, David Wilson Homes	<ul style="list-style-type: none"> • Spaces at Stoke High School could become an issues if the range of neighbouring sites are developed. • Consider car parking instead for surrounding residents. • Site will suffer from noise and air pollution due to proximity to busy road and railway. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Increased development on Wherstead Road is putting further strain on local infrastructure. • A health facility instead would benefit the local community and take the strain of nearby Stoke Park Doctors Surgery.
Appendix A	UC086 Land north of Ranelagh Road	5	4	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County	Greenways Countryside Project, The Ipswich Society, Inland	<ul style="list-style-type: none"> • Site situated within the flood plain. • Site will suffer from noise and air pollution due to proximity to busy road and railway. • Site located in area of traffic congestion. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools,

				Council	Waterways Association, River Action Group	<p>police and emergency services.</p> <ul style="list-style-type: none"> • Viability of site extremely questionable. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Lower density scheme would be more appropriate. • In conjunction with other potential development sites nearby could create school place issue.
Appendix A	UC088 15-19 St Margaret's Street	0	1		Crest Nicholson	<ul style="list-style-type: none"> • Support no allocation
Appendix A	UC089 Banks of river, upriver from Princes Street	4	4	Suffolk County Council, Sustrans, Suffolk County Council	Greenways Countryside Project, Inland Waterways Association, River Action Group, Crest Nicholson	<ul style="list-style-type: none"> • Site located in area of traffic congestion development would increase problems. • In conjunction with other potential development sites nearby could create school place issue. • Need to ensure that the proposed cycle route is not compromised by the suggested public transport route. • Future of existing rail cord should be considered prior to any allocation for development.
Appendix A	UC090 Corner of Curriers Lane / Princes Street	0	1		Crest Nicholson	<ul style="list-style-type: none"> • Support no allocation.
Appendix A	UC091 County Hall, St Helen's Street	1	1	Mersea Homes, Crest Nicholson, David Wilson Homes	Crest Nicholson	<ul style="list-style-type: none"> • Site has planning permission.
Appendix A	UC093 Area north of Carr Street	1	2	Suffolk County Council	Crest Nicholson, East of England Cooperative	<ul style="list-style-type: none"> • Right of way in vicinity of site

					Society	
Appendix A	UC094 Car Park off St Nicholas Street	2	1	The Ipswich Society, Suffolk County Council	Crest Nicholson	<ul style="list-style-type: none"> • Cromwell Square is a visual disaster, reduce number of car parking spaces and introduce landscaping. Cont'd ... <ul style="list-style-type: none"> • Suggest conversion of car park to open space to reduce traffic use of St Nicholas Street and improve conditions for pedestrians and cyclists.
Appendix A	UC096 Waterworks Street	3	1	East of England Cooperative Society, Mersea Homes, Crest Nicholson, David Wilson Homes, Clare Vint	Crest Nicholson	<ul style="list-style-type: none"> • Site serves for operational purposes for businesses and other non-residential users. • Site is in multiple ownerships and holds significant existing use value to occupiers. • 80% residential preferred – additional facilities would need to be provided for influx of people to area.
Appendix A	UC104 Rear of Grafton House, Russell Road	0	1		David Barker on behalf of Crest Nicholson	<ul style="list-style-type: none"> • Support employment
Appendix A	UC109 Handford Road (east)	3	4	Mersea Homes, Crest Nicholson, David Wilson Homes	Greenways Countryside Project, The Ipswich Society, Inland Waterways Association, River Action Group	<ul style="list-style-type: none"> • Site situated within flood plain. • Difficulty in accommodating 10% open space requirements. • Major difficulties in delivery of site due to flood risk and existing land values. • Site better retained for commercial development.
Appendix A	UC111 Transco, south of Patteson Road	4	1	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes,	Firstplan,	<ul style="list-style-type: none"> • Site situated within flood plain. • Flood defence barrier would be required. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services.

						<ul style="list-style-type: none"> • Reduce density due to heights that would be required. • Difficulty in accommodating 10% open space requirements. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Density of housing proposed out of keeping with the area and inappropriate given the flood risk. • Retain employment uses.
Appendix A	UC199 Land east of West End Road	5	2	Greenways Countryside Project, Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council	Inland Waterways Association, River Action Group	<ul style="list-style-type: none"> • Requirement for allocation of open space to facilitate improvement of river path and corridor. • Site situated within the flood plain. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Retain present use, industry in Ipswich is disappearing and is needed to support the increase in population that more houses will bring. • Buffer strip along part of site will be required even with flood defence barriers in place. • Existing uses on site hold significant value. • Delivery of site for residential almost impossible. • Site is occupied by 4 viable businesses. • Difficulty in accommodating 10% open space requirements. • Site is within 60 metres of high voltage overhead transmission lines.
Appendix A	UC201 Land west of West End Road (south)	5	2	Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County Council, Henry Cooper	Greenways Countryside Project, River Action Group	<ul style="list-style-type: none"> • Existing uses on site hold significant value, unlikely to exceed residential values. • Site situated within flood zone. • Site contaminated. • Constrained location between river and busy road, difficult north – south pedestrian movement. • Site location next to busy road will be subject to noise and pollution. • Forming an access junction on the A137 will cause operational difficulties.

						<ul style="list-style-type: none"> • Difficulty in accommodating 10% open space requirements. • Several of the established businesses have recently invested in new modern buildings at the site. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Site would be better retained for existing retail uses. • Industry in Ipswich is disappearing and is needed to support the increase in population that more houses will bring. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Flood barrier is needed.
Appendix A	UC224 Car Park, Crown Street / Tower Ramparts	3	0	W J Hammond, Mersea Homes, Crest Nicholson, David Wilson Homes		<ul style="list-style-type: none"> • Retail outlet above lower level car park preferred. • If bus station cannot accommodate increased traffic site should be used for 'out of town' buses and allow space for existing retailers to expand. • Providing four units on this site seems implausible and is entirely dependent on alternative uses exceeding a high existing value. • Site located within area of archaeological importance. • Poor location for housing in respect of residential amenity.
Appendix A	UC249 St Matthew's Street	2	1	Henry Cooper, Crest Nicholson	Mersea Homes, Crest Nicholson, David Wilson Homes	<ul style="list-style-type: none"> • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site partially listed within conservation area and area of archaeological importance. • Listed building adjacent to site. • Constrained access opportunities due to proximity of site to roundabout.
Appendix A	UC251 Silo, College Street, Northern Quays (west)	4	0	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Suffolk County		<ul style="list-style-type: none"> • Site situated within the flood plain. • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Site within conservation area, listed building adjacent, within

				Council		<p>area of archaeological importance and within air quality management area.</p> <ul style="list-style-type: none"> • Difficulty in accommodating 10% open space requirements. <p>Cont'd ...</p> <ul style="list-style-type: none"> • Development is dependent on tidal barrier.
Appendix A	UC254 253/255 London Road	2	0	Mersea Homes, Crest Nicholson, David Wilson		<ul style="list-style-type: none"> • Retail likely to be most viable use. • TPO on site. • Poor location for residential development due to traffic noise and fumes and impact from the McDonalds. • Any residential development would lack adequate amenity space.
Appendix A	UC256 Royal Mail Sorting Office, Commercial Road	0	1		Crest Nicholson	<ul style="list-style-type: none"> • Support no allocation.
Appendix A	UC259 Duke Street, School Site	3	1	Suffolk County Council, Gordon Terry	Crest Nicholson	<ul style="list-style-type: none"> • Location causes concern due to proximity to busy road, lack of suitable space for grass playing fields (Holywells Park is not deemed to be suitable for this provision). • Potential problems concerning site acquisition. • Likely site contamination. • Council failed to notify all individual occupiers in the site area at the inception of the proposal. • Successful business exists on site. • Authorities would need to negotiate, leading to a possible compulsory purchase inquiry. • There would be costs for land and property replacement and compensation for loss of business.
Appendix A	UC270 Car Park, Sir Alf Ramsey Way / Portman	0	1		Crest Nicholson	<ul style="list-style-type: none"> • Support employment use.

	Road					
Appendix A	UC271 2-6 Russell Road	5	0	Henry Cooper, Mersea Homes, Crest Nicholson, David Wilson Homes, Her Majesty's Court Service		<ul style="list-style-type: none"> • Site situated within the flood plain. • TPO on site. Cont'd ... <ul style="list-style-type: none"> • If more houses are built in town centre it will put intolerable demands on road infrastructure, health service, schools, police and emergency services. • Retail and industry are needed to support the increase in population that more housing will bring. • Existing uses on site hold significant value. • Car parking ratios on site will be held under lease and will be required to maintain viability of existing uses. • Site will be unavailable for development without the relocation of existing uses. • It is by no means obvious how housing could take up 50%. • Risk of flooding on site seriously prejudices residential development on this site. • Existing uses well established.

Table 3: Preferred Options Analysis – Site Allocations and Policies

Please note that the table below covers site related comments within Appendix 3 rather than Chapter 7.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Whole document	Comment on whole document	10	2	Sport England – East Region Environment Agency, GO East, Peacock & Smith Ltd., RSPB, K Wilson, Crest Nicholson	Stephen Marginson EERA	<ul style="list-style-type: none"> • No proper mix of housing is provided for, flats outnumbering houses (approx 80:20). • Need more affordable housing. • Greenfield development is needed to provide a wider and more suitable mix of house types as well as affordable family housing. • A Strategic Housing Land Availability Study required addressing vital housing issues. • Strategic Housing Market Assessment should also be published. • Consultation document does not identify any sites specifically for meeting potential sports facility need that will arise during the period of the DPD (SE). • Sites lying within the medium to high risk Flood Zones 2 and 3 need to undergo Sequential Test as stated in paragraph 16 of PPS 25. • Obligation of the Council under the Water Framework Directive- ensure proposed development is phased to ease off pressure on water resources. • Lack of detail in the Core Strategy in relation to scale of growth at broad locations and conformity with the Core Strategy. Site Specific Allocations DPD would need to identify the sites where the Policy Area 13 of the Core Strategy applies. • Lack of the any clear timescales for the DPDs. • Limited references to the Sustainability Appraisal in the Site Allocations and Policies DPD. <p>Cont'd ...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Lack of contingency planning to ensure delivery, should brownfield sites not come forward as predicted. • In The Core Strategy Policy Area 2, the existing Morrisons store at Sproughton Road should be included within the proposed district centre's boundary. • Each site should be evaluated on the basis of its merits and value to the community. • Concerns about proposed development sites or adjacent to sites that are important for nature conservation.
Chapter 1 Introduction		0	0			No comments made.
Chapter 2 The New Planning System	Comments on and/or omissions from whole chapter	2	0	Home Builders Federation		<ul style="list-style-type: none"> • Council needs to ensure that a range of both Brownfield and Greenfield sites are available for development. • Range of different types and forms of housing are provided in various locations to meet the needs of its population. • A Strategic Housing Market Assessment required as an essential tool and evidence base. • Planning gain requirement to be fully considered in relation to site viability. • Flexible approach to be adopted for delivery of affordable housing. • Shorter DPDs to be prepared as promoted under the new planning system.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Chapter 3 The Core Strategy and Policies Document	Comments on and/or omissions from whole chapter	1	1	CABE	EERA	<ul style="list-style-type: none"> • Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time. • Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales. • To take aspiration to implementation, local planning authorities' officers and members should champion good design. • Treat design as a crosscutting issue – consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm. • Design should reflect understanding of local context, character and aspirations. • Include adequate wording or 'hooks' within the policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes.
Chapter 4 The Ipswich Community Plan	Comments on and/or omissions from whole chapter	0	0			No comments made
Chapter 5 Ipswich Local Dev't Framework	Comments on and/or omissions from whole chapter	1	1	EERA	EERA	<ul style="list-style-type: none"> • References to the East of England plan require updating to reflect current position with regard to progress.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Chapter 6 Site or Area Based Policies	Comments on and/or omissions from whole chapter	2	0	EERA Crest Nicholson		<ul style="list-style-type: none"> No clear policies for meeting the accommodation of Gypsies and Travellers (EERA) Alternative location should be suggested for the two pitches on the site that is to be redeveloped. (EERA) Lack of the any clear timescale for the DPD.
Chapter 6 Site or Area Based Policies	Policy Area 39 Protection of Identified Sites for the Uses Proposed	5	0	Merchant Projects Ltd., C E Jones, Environment Agency, PRUPIM, Mersea Homes.		<ul style="list-style-type: none"> Non-allocation of Henley Road Sports Club- the additional facilities that the Club needs cannot be accommodated within the existing boundary so the site should be allocated for residential development. Any site where the developer fails to carry out any investigation or assessment required under PPS or contravenes environmental legislation, EA will object to it even if the site is not allocated. Council has no self-determined right to reserve sites for its own plans, if objections have been raised and upheld against such use. More flexible approach should be taken to protection of sites for the used purposes; otherwise it would preclude development over the Plan Period. This Policy serves no useful function and is unclear in its implementation.
Chapter 6 Site or Area Based Policies	Policy Area 40 The Identification, Protection and Development of Green Corridor	2	5	Ipswich School, Mersea Homes	James Baker-Greenways Project, Natural England, Environment Agency, RSPB	<ul style="list-style-type: none"> Site Allocation Plan A and Plan B should not be part of either the green corridor or green rim as this would compromise the delivery of the Ipswich School's expanded sports facilities. No clear mechanism proposed for the basis of identification of the green corridors and their expansion.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
Chapter 6 Site or Area Based Policies	Policy Area 41 The Identification and Protection of Employment Areas	1	2	Mersea Homes	Strutt & Parker, Ashfield Land	<ul style="list-style-type: none"> • PA 41 should provide a policy basis for protecting existing employment uses, rather than simply focussing in employment areas. • Policy relationship should also be made with other policy areas in the Core Strategy, Site Allocations DPD and IP-One AAP. • Policy should recognise breadth of issues which land use policy affects, based on analysis and robust evidence base.
Chapter 7 Proposed Sites	Comments on and/or omissions from whole chapter	32	3	Highways Agency, Home Builders Federation, Suffolk County Council, Chartered Town Planning Consultants, EERA, Anglian Water Services Ltd., Mersea Homes, Crest Nicholson, David Wilson Homes, Ashfield Land, Sina Developments, Trustees of the PE Cooke Settlement, Ipswich School	Natural England, Anglian Water Services Ltd., Mersea Homes, Crest Nicholson, David Wilson Homes	<ul style="list-style-type: none"> • Transport assessment to be undertaken for the sites before including them in the DPD in accordance with the provisions of Department for Transport Circular 02/2007 Planning and the Strategic Road Network and the Guidance on Transport Assessment (March 2007). (HA) • No reference made to Strategic Housing Land Availability Assessment (SHLAA) or SHMA in order to inform evidence base in accordance with PPS3. • Sites should be allocated in terms of which would provide the best opportunities for achieving the principles of sustainable development as set out in PPS1 and East of England Plan Policy SS1. • Concerns about the number of playing field and urban open spaces identified as preferred options for development. • Land opposite 289-299 Henley Road to be considered for development. This has been out of agriculture but has become redundant as sports field. • Back land at 6 Tuddenham Road to be included as residential development for two new houses. <p>Cont'd ...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Unclear whether the East of England Housing target is met or not. The Council intends to meet its basic obligation for housing delivery (ie 15,400 out of 20,000 for Ipswich Policy Area). Consultation document does not make it clear that the need to support a further 4,600 homes in the IPA has been taken onto account or not. • Figures for housing allocation and delivery in this document and Core Strategy document (paragraph 8.144) are not consistent with those in the Ipswich Site Allocations and Policies document (para 7.4). • Water Cycle Study to be included in the list of reference documents. Phasing of development may be required to enable infrastructure upgrades to be undertaken. • Too much development taking place in Ipswich, especially flatted housing development. • Long-term residents of Ipswich are disappointed and frightened to see every open space devoured, especially UC 185 St. Clements Hospital site. • The Core Strategy Preferred Options states that site allocations have been made having regard to the estimated net change in employment over thirteen sectors between 2001 and 2021, taken from the Haven Gateway Employment Land Study in 2005. However, it is unclear what the contribution of each site will be in terms of the estimated job growth by sector. <p>Cont'd ...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Core Strategy fails to allocate site (UC 257) for employment use. Ashfield Land has acquired freehold ownership of 22.5 ha of land adjacent to junction 53 of the A14. It has undertaken studies and amassed evidence to demonstrate that it can deliver a high quality, strategic employment-led mixed-use development on site bringing major benefits to the Ipswich Policy Area. These focus on generating up to 2,000 new jobs, significantly improving accessibility by public transport into Ipswich from A14 and providing 9 ha of managed public open space. • The site at Church Farm [north Ipswich] is recommended for allocation as a site for residential development, but is not included in the list of proposed sites in the document. • Residents of Landseer Road have asked in the past whether there is a possibility that the heavy vehicle Testing Station in Holbrook Road, off Landseer Road might be relocated, thereby removing some heavy traffic from this area. • The Ipswich School requests that the land north of Valley Road (Site Location Plan A) is allocated for housing. The site forms part of the recognised expansion area at the Northern Fringe, but is in itself a stand alone proposal, which delivers: <ul style="list-style-type: none"> -New sports facilities for Ipswich School and the wider community (at land west of Tuddenham Road) -Enhanced opportunities for pupils at Ipswich School -The natural expansion of a successful local school. <p>Cont'd ...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> Concerns on deliverability, availability, density and suitability of specific allocations in the Proposed Site Allocations Document. Objection to lack of allocation of land at Red House Farm. Object to conclusion (para 7.3) that 2870 dwellings can be delivered – the figure does not reflect risks to delivery Need a better mix of dwellings – 80% of approvals are flats which represents an oversupply
Chapter 8 Development of the Proposals Map	Comments on and/or omissions from whole chapter	0	0			No comments made.
Chapter 9 Implementation, Targets, Monitoring and Review	Comments on and/or omissions from whole chapter	3	0	EERA GO East Crest Nicholson		<ul style="list-style-type: none"> No clear policies dealing with implementation and monitoring. All policies relating to the above need to be included in the Core Strategy. Lack of contingency planning to ensure housing delivery should brownfield sites not come forward as predicted.
Appendix 3 Site Allocation Details	1 UC005 Former Tooks Bakery	8	3	Highways Agency ABF Plc, Henry Cooper Lucia Aguilar-Gomez Suffolk County Council, Crest Nicholson Mersea Homes David Wilson	Merchant Projects Ltd Steven Wells Crest Nicholson Mersea Homes David Wilson Homes (joint)	<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands and congestion. It would be unacceptable to provide a further all-movements junction on Bury Road, since this would be highly likely to contribute to further delays in the flow of traffic on Bury Road, particularly the inbound stream during the morning peak. This would also affect the bus lane. Any access for these sites should be sought from Old Norwich Rd Cont'd ...

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Homes		<ul style="list-style-type: none"> Proposed density low. Site has a better potential to be developed as high quality employment land. Support, but should be allowed to develop the site independently of UC033 adjacent
Appendix 3 Site Allocation Details	2 UC008 All Weather Area Halifax road	76	0	Maidenhall Residents Association Sport England-East Region Cllr. Smart, Cllr Powell, IBC Labour Group Mersea Homes Crest Nicholson David Wilson Homes Wherstead Road Residents' Association Suffolk County Council, and 67 Individuals		<ul style="list-style-type: none"> Site should be retained as existing use – it is well used as a play area and bowls club and community building. Proposed development would lead to additional traffic demands and congestion. An alternative site for replacement of existing activities has not been identified in the DPD (SE) The PPG17 study is not yet published so there is no evidence of a surplus of children's play or bowls clubs (SE) Overlooking and loss of privacy for adjoining houses Site would not be deliverable because it is an open space Loss of trees Children would be forced to play in the streets Loss of views enjoyed by existing dwellings Could only support if a new bowls club were provided Need to keep leisure facilities for a growing population Extra development would put intolerable demands on infrastructure The Council has just spent money improving the play equipment so it would be wasteful to destroy it <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> Should resist development but move teen shelter to Stoke High School and make the bowls pavilion Maidenhall Community Centre
Appendix 3 Site Allocation Details	3 UC009 Victoria Nurseries, Westerfield Road	4	2	The Ipswich Society I McKie L Lay Cllr Lockington	Crest Nicholson, Mersea Homes, David Wilson Homes	<ul style="list-style-type: none"> Site to be retained as existing use. Valuable local amenity Enables people to buy provisions locally so more sustainable Place for the community to meet It's a unique place and an excellent nursery, one of few within Ipswich
Appendix 3 Site Allocation Details	4 UC010 Co-op Depot, Felixstowe Road	9	0	Greenways Project East of England Co-op Society Ltd Suffolk County Council, Highways Agency Mersea Homes, Crest Nicholson David Wilson Homes E Phillips, H Cooper,		<ul style="list-style-type: none"> Transport assessment to be undertaken for the site before the proposed development commences (HA, SCC) Site to be retained as existing use. Proposed development would lead to additional traffic demands and congestion. Proposed density too high. Loss of jobs. Proximity to railways. Support but the area should be extended to cover all the Co-op's land holding and should allow for additional retail floor space Value of existing uses and multiple ownerships and tenancies will affect delivery
Appendix 3 Site Allocation Details	5 UC013 Hill House Road	2	1	Greenways Project, Crest Nicholson	Mersea Homes, Crest Nicholson, David Wilson Homes (joint)	<ul style="list-style-type: none"> Proposed density too high. Need high quality boundary to park
Appendix 3 Site Allocation	6 UC016 Funeral Directors,	17	1	IBC Labour Group Crest Nicholson David Wilson	East of England Co-op Society Ltd.	<ul style="list-style-type: none"> Proposed density too high and may disturb wildlife. Cont'd...

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Details	Suffolk Road			Homes, Mersea Homes, A Leathley, Cllr Lockington, Cllr Ellesmere, & 10 Individuals		<ul style="list-style-type: none"> • Should be lower density low-rise development with open space and plenty of parking • Alternative uses suggested: community facilities, parking, play area, wildlife, school and medical centre • Site has risk to Radon. • Site has risk to flooding. • Proposed development would lead to additional traffic demands and congestion – already difficult for emergency access. • Development would lead to overlooking and loss of privacy • Insufficient parking in the area • Primary school is full • Support, but access should be from Tuddenham Avenue and development should be car free • Site contains a phone mast • Site contains protected trees • Unnecessary strain to existing infrastructure and services.
Appendix 3 Site Allocation Details	7 UC017 Land west of Handford Cut	2	1	IBC Labour Group Crest Nicholson	Mersea Homes, Crest Nicholson, David Wilson Homes (joint)	<ul style="list-style-type: none"> • Proposed development would lead to additional traffic demands and congestion. • Site at risk of flooding.
Appendix 3 Site Allocation Details	8 UC018 Deben Road	6	1	Crest Nicholson S Wragg, L Lay, A K Chamberlain, S R Peck, P E Kersey	Mersea Homes, Crest Nicholson, David Wilson Homes (joint)	<ul style="list-style-type: none"> • Proposed development would lead to additional traffic demands and congestion. • Rise in anti-social behaviour. • Site to be retained as existing use. • Proposed density too high. • Loss of jobs. • Unnecessary strain to existing infrastructure and services.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Appendix 3 Site Allocation Details	9 UC019 153-159 Valley Road	1	2	The Ipswich Society	Greenways Project Crest Nicholson	<ul style="list-style-type: none"> Site is deliverable (low density housing) but would need to incorporate pedestrian and cycle access to playing field.
Appendix 3 Site Allocation Details	10 UC020 Water Tower & Tennis Courts, Park Road	10	1	Sport England-East Region Crest Nicholson Cllr Lockington, A Catto, S Abbott, A Chester, A Cooper, P Gray, R A Gosling, C Foster, R A Bush,	Mersea Homes, David Wilson Homes Crest Nicholson (joint)	<ul style="list-style-type: none"> Object to loss of tennis courts – an alternative site for replacement of existing activities is not identified in the DPD. Proposed density too high and may disturb wildlife. Site to be retained as existing use. Proposed development may interfere with water tower and reservoir at the site. Proposed development is threat to social, economical and environmental activities. Proposed development would lead to additional traffic demands and congestion. Unnecessary strain to existing infrastructure and services. Water storage should be kept as threat of drought increases Harm to character of Park Road Conservation Area Where will masts on water tower go? Traffic problems already on Park Rd and Elsmere Rd Site contains stag beetles Pressure on school places
Appendix 3 Site Allocation Details	11 UC021 Randwell Close	13	0	IBC Labour group Crest Nicholson Mersea Homes, Greenways Project David Wilson Homes, D Mullett, J W Gorham, B A Cudmore, Cllr		<ul style="list-style-type: none"> Object to loss of large gardens that support wildlife Proposed density too high and may disturb wildlife. Site awkward to be developed for housing with no proper access. Retain open space or no allocation. <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Martin, Y P Graves, R A Barnes, E Phillips, N White		<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands and congestion. Randwell Close is too narrow for access, and has a sharp bend in it and poor visibility at its junction Support housing but with lower density and low rise to preserve privacy There has been a recent consent for housing
Appendix 3 Site Allocation Details	12 UC022 The Albany	4	1	Greenways Project Crest Nicholson Henry Cooper David Wilson Homes	Mersea Homes, David Wilson Homes Crest Nicholson (joint)	<ul style="list-style-type: none"> Proposed density too high. Ecological appraisal essential Should be a nature reserve This scale of development would over stretch infrastructure
Appendix 3 Site Allocation Details	13 UC023 94 Foxhall Road	0	1		Crest Nicholson	<ul style="list-style-type: none"> Support
Appendix 3 Site Allocation Details	14 UC024 Fire Station, Colchester Road	9	0	Mersea Homes, Suffolk Amphibian and Reptile Group (SARG), IBC Labour Group Crest Nicholson David Wilson Homes, Mr & Mrs Cornwall, I M Maeers, L Aquilar-Gomez,		<ul style="list-style-type: none"> Site should be retained as existing use. Proposed development would lead to additional traffic demands and congestion. This site is near allotments that have records of smooth newts and common frogs, and possible slow worms hence full survey needed before any development If development takes place it should be low rise, up market family homes Sidegate Lane too busy for access
Appendix 3 Site Allocation Details	15 UC025 Mallard Way Garages	8	0	Crest Nicholson David Wilson Homes, Mersea Homes, A Bultitude, R Kirby,		<ul style="list-style-type: none"> The 33 garages are nearly all in use – would have to park on street without them creating congestion and with less security for car <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				D H Boater, Mrs Abbott, J R Scrivener, R F Powell,		<ul style="list-style-type: none"> • Site should be retained as existing use. • Garages also used for vital storage • No privacy for adjoining houses. • Site awkward to be developed for housing with no proper access.
Appendix 3 Site Allocation Details	16 UC026 Former Garages, Recreation Way	1	1	Crest Nicholson	Mersea Homes, David Wilson Homes Crest Nicholson (joint)	<ul style="list-style-type: none"> • Proposed density too high.
Appendix 3 Site Allocation Details	17 UC027 163 & 165 Henniker Road	3	1	EERA Crest Nicholson Suffolk County Council	Mersea Homes, David Wilson Homes Crest Nicholson (joint)	<ul style="list-style-type: none"> • Alternate sites for replacement of existing two pitches for Gypsies and Travellers must be identified. • Proposed density too high.
Appendix 3 Site Allocation Details	18 UC028 Widgeon Close Garages	0	1		Crest Nicholson	<ul style="list-style-type: none"> • Supporting comments
Appendix 3 Site Allocation Details	19 UC030 Land opposite 674-734 Bramford Road	13	4	Bramford Parish Council, Suffolk County Council, Highways Agency SARG, Crest Nicholson, David Wilson Homes, J Fairburn, I Fairburn, H Cooper, A Andersen, S Deas, R Nunn,	Greenways Project Mersea Homes, David Wilson Homes Crest Nicholson (joint), I McKie, E Apea-Agyei,	<ul style="list-style-type: none"> • Transport assessment to be undertaken for the site (HA) • Proposed development would lead to additional traffic demands, parking problems and congestion. • Bramford lane is too congested already and cannot take more traffic • Proposed density too high. • Site survey to be conducted properly before any development commences (for reptiles/amphibians) • Site better suited for employment use. • Site used for dog walking • Development would cause noise and disruption <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Would devalue existing houses • Several supporting comments for green rim element of site
Appendix 3 Site Allocation Details	20 UC031 Land at Humber Doucy Lane	0	4		Greenways Project, Little Bealings Parish Council, Crest Nicholson, E Phillips	<ul style="list-style-type: none"> • Support non-allocation of site and retaining existing use.
Appendix 3 Site Allocation Details	21 UC033 King George V Field, Old Norwich Road	9	2	Greenways Project Sport England-East Region Highways Agency IBC Labour group Crest Nicholson Suffolk County Council David Wilson Homes H Cooper K Brinkley	Merchant Projects Ltd., David Wilson Homes, Mersea Homes, Crest Nicholson (joint)	<ul style="list-style-type: none"> • Transport assessment to be undertaken for the site. • Loss of valuable open space in prominent location • Loss of well used playing fields • An alternative site for replacement of existing activities has not been identified in the DPD (SE) • Proposed density too high. • Site better suited for employment use. • Support but development split is too prescriptive – need more flexibility
Appendix 3 Site Allocation Details	22 UC034 Land at Bramford Road (Stock's site)	6	4	Bramford Parish Council GeoSuffolk Crest Nicholson SARG SCC A Anderson	Greenways Project Mersea Homes, Crest Nicholson & David Wilson Homes (joint) Suffolk Wildlife Trust Mr & Mrs I Mckie	<ul style="list-style-type: none"> • Proposed development would lead to additional traffic demands and congestion. • Site has risk to flooding. • Site survey to be conducted properly before any development commences. • Proposed density too low. • Site awkward to be developed for housing with no proper access. • Planning consent should be conditional on letting geologists and archaeologists have access to site to sample important deposits.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Appendix 3 Site Allocation Details	23 UC035 578 Wherstead Road	8	0	Greenways Project Robert Brett & Sons Ltd. Environment Agency Wherstead Road Residents Association Skinner Salter Partnership Crest Nicholson David Wilson Homes, Mersea Homes RD Ward		<ul style="list-style-type: none"> • Site has close proximity to wharf, so housing not acceptable. • Site is closely adjacent to site of special scientific interest. • Site has risk to flooding. • Proposed development to be phased to ease off pressure on water resources • Proposed density high. • Proposed development would lead to additional traffic demands, parking problems and congestion. • Unnecessary strain to existing infrastructure and services. • Site to be retained as open space. • Proposed density too low.
Appendix 3 Site Allocation Details	24 UC061 Raeburn Road South / Sandy Hill Lane	14	1	Greenways Project Natural England Environment Agency Gainsborough Retail Park Ltd. SCC Suffolk Rights of Way Ltd. Suffolk Wildlife Trust Highways Agency Mersea Homes, Crest Nicholson & David Wilson Homes Ltd. Ashfield Land Associated British Ports	IBC Labour group	<ul style="list-style-type: none"> • Transport assessment to be undertaken for the site before development commences. (HA) • Ecological survey necessary before any development commences. (EA) • Site covers land designated as County Wildlife Site. • Proposed development would lead to additional traffic demands, parking problems and congestion. • Unnecessary strain to existing infrastructure and services. • Site adjacent to sewage farm. • Proposed development to be phased to ease off pressure on water resources. • Public Right of way passing through the site. • Site has risk to flooding. • Site unsuitable for employment use. <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Crest Nicholson H Cooper Mr & Mrs I Mckie		<ul style="list-style-type: none"> Proposed development may impact port operational facilities. Support allocation but should include retail use.
Appendix 3 Site Allocation Details	25 UC062 Elton Park Industrial Estate	10	3	Environment Agency JG Ipswich LLP Scott-Brown partnership Mersea Homes, Crest Nicholson & David Wilson Homes (joint) Highways Agency Crest Nicholson SCC, Andrew Martin Associates H Cooper Mr & Mrs I Mckie	Greenways Project Inland Waterways Association Ipswich branch River Action Group	<ul style="list-style-type: none"> Transport assessment to be undertaken for the site. Site better suited for employment/industrial use. Unnecessary strain to existing infrastructure and services. Site has risk to flooding. Proposed development would lead to additional traffic demands, parking problems and congestion. Proposed development to be phased to ease off pressure on water resources. (EA) Proposed density high. Site wholly to be allocated for employment use. Support bridge but it should be capable of taking buses. Buffer zone should be retained along the river. (EA) Support in principle except for requirement to rehouse existing company.
Appendix 3 Site Allocation Details	26 UC064 School site, Lavenham Road	2	1	Highways Agency SCC	Crest Nicholson	<ul style="list-style-type: none"> Potential impact of development on highways to be assessed before the development commences. (HA)
Appendix 3 Site Allocation Details	27 UC065 London Road Allotments	96	2	Greenways Project SCC Chris Mole (MP) Suffolk Wildlife Trust Pupils- Ranelagh Primary School	Mersea Homes, Crest Nicholson & David Wilson Homes (joint) David Lawson	<ul style="list-style-type: none"> Site is statutory allotment containing rare trees and wildlife. Site to be retained as existing use. Proposed development would lead to additional traffic demands, parking problems and congestion. <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				David Ellesmere-IBC SARG Moor Land Road Allotment holders London Road Allotment holders Northgate & Colchester Road Allotment Holders Maidenhall Allotment Holders Castle Hill Allotment Field Committee Ipswich Allotment Holders Association Belstead Allotments IBC Labour Group Crest Nicholson David Wilson Homes And 74 Individuals		<ul style="list-style-type: none"> • Development on Greenfield space not preferred. • Proposed development will have a detrimental effect on the already densely populated surroundings. • Potential loss of local wildlife habitat as site contains reptiles. • Proposed density high. • Council has to have regard to biodiversity under the NERC Act 2007. • Site has poor drainage. • Proposed development may lead to flooding problems for adjacent houses. • Ecological survey necessary before any development commences. • There has been an increase in take up of plots and are working to continue that, as plot once lost is gone forever.
Appendix 3 Site Allocation Details	28 UC066 London Road Allotments	0	10		Greenways Project SARG Suffolk Wildlife Trust London Road Allotment Holders Crest Nicholson D Lawson, B Rudkin, S Rudkin,	<ul style="list-style-type: none"> • Comments in support of non-allocation.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
					Pupils at Ranelagh Primary School, I Mckie	
Appendix 3 Site Allocation Details	29 UC068 Former 405 Club, Bader Close	11	1	Highways Agency Greenways Project Sport England-East Region SCC Suffolk Wildlife Trust SARG IBC Labour Group Crest Nicholson David Wilson Homes H Cooper Mr & Mrs I Mckie	Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> • Transport assessment required before any development commences. • Alternate sites for replacement of existing activities not identified. • Proposed development would lead to additional traffic demands and congestion. • Site to be retained as playing field and open space area. • Site has wildlife interest, so buffer strip to be included to retain that. • Site to be provided for housing and community uses. • Support allocation but should with open space to railway corridor. • Poor access to the site.
Appendix 3 Site Allocation Details	30 UC069 JJ Wilson, White Elm Street	2	2	Rachel Collins-SCC Crest Nicholson	Strutt & Parker Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> • Proposed development would lead to additional traffic demands and congestion. (SCC) • Proposed development along with other potential housing areas will have significant implications on provision of school places. (SCC) • Site wholly to be allocated for employment use as it is in a prime location within the employment area.
Appendix 3 Site Allocation Details	31 UC070 Former British Energy Site, Cliff Quay	9	2	Greenways Countryside Project, Highways Agency, Suffolk County Council,	British Energy Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> • Retain pedestrian and cycle links across the site. • Transport assessment required before any development commences. (HA, SCC) <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Environment Agency, H Cooper, Associated British Ports Ashfield Land Crest Nicholson David Wilson Homes		<ul style="list-style-type: none"> Proposed density high. Retain and extend employment use on the site. Site contains land contamination issues. (EA) Proposed development to be phased to ease off pressure on water resources. (EA) Proposed development may impact port operational facilities. Proposed development along with other potential housing areas will have significant implications on provision of school places. (SCC) Site unsuitable for housing due to proximity to sewage works and contamination issues.
Appendix 3 Site Allocation Details	32 UC073 Land between Cobbold Street and Woodbridge Road	431	1	Ipswich Caribbean Association, SCC, Ipswich Hindu Samaj, Nu Roots, Cut It! Style It!, IBC Labour Group, Crest Nicholson, Mind Charity Shop, Julienes Internet Café, Ipswich Community Radio, CSV Media Clubhouse, Suffolk School of Samba, Bangladeshi Support Centre, 1 st Source Ltd, St John Ambulance, ICA Dominos Club, Ipswich & Suffolk Council for Racial	Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> Proposed development would lead to loss of important community space. (SCC) Alternate sites for replacement of existing activities not identified. Proposed development would lead to additional traffic demands, congestion and poor air quality. (SCC) Retain existing use on the site. Site lies in the Conservation Area. Proposed density too high. Site more suitable for commercial and community uses. Proposed development along with other potential housing areas will have significant implications on provision of school places. (SCC) If development goes ahead it should be considered for supported housing. (SCC)

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Equality, BOBCO, Thurleston High School, Zephyr Security, Cutting Entertainment and 410 individuals.		
Appendix 3 Site Allocation Details	33 UC076 Cocksedge Engineering, Sandy Hill Lane	2	1	Suffolk County Council, Crest Nicholson	Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> Proposed development along with other potential housing areas will have significant implications on provision of school places. (SCC) Site is part of an employment area with proximity to sewage works. SCC holds long-term lease and is concerned about alternative uses. (SCC) Proposed development would lead to a loss of valuable employment site. Retain as existing use.
Appendix 3 Site Allocation Details	34 UC077 Thomas Wolsey Special School, Old Norwich Road	8	2	Highways Agency Sport England-East Suffolk County Council, Crest Nicholson, H Cooper and Mr & Mrs PA Riches	Greenways Project Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> Transport assessment required before any development commences. (HA) Alternate sites for replacement of existing activities not identified. (SE) Retain existing use on the site. Proposed development would lead to additional traffic demands and congestion. Proposed development would lead to loss of protected trees, wildlife and privacy of adjoining houses. Access to the site should be provided from the Old Norwich Road to provide more clearance from the signal junction. (SCC) Proposed density is high.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Appendix 3 Site Allocation Details	35 UC079 Playing Fields, Victory Road	0	5		Sport England-East Suffolk County Council IBC Labour Group, E Phillips, I Mckie	<ul style="list-style-type: none"> Support non-allocation of the site with flexibility for expansion of local educational uses.
Appendix 3 Site Allocation Details	36 UC080 Land at Yarmouth Road	10	2	Greenways Project Environment Agency, Planning Potential Mersea Homes, Crest Nicholson & David Wilson Homes Ltd. Crest Nicholson IBC Labour Group Suffolk County Council, David Wilson Homes, Mersea Homes, I Mckie	Inland Water Association Ipswich branch River Action Group	<ul style="list-style-type: none"> Retain the site as open space/ wildlife/ recreational use. Site has risk to flooding. (EA) Proposed development to be phased to ease off pressure on water resources. (EA) Site not ideal for housing development, more suitable for leisure or retail use. Proposed development would lead to additional traffic demands and congestion. (SCC) Proposed development along with other potential housing areas will have significant implications on provision of school places. (SCC) Support allocation but housing element should have high environmental standard and riverside environment centre should help to enable people to access the river for recreation.
Appendix 3 Site Allocation Details	37 UC081 St Margaret's Green / Woodbridge Road	0	1		Crest Nicholson	<ul style="list-style-type: none"> Support the allocation.
Appendix 3 Site Allocation Details	38 UC083 Land north of Whitton Sports Centre	2	3	Sport England-East SCC	Greenways Project SARG Crest Nicholson	<ul style="list-style-type: none"> Retain the site as open space or extend it as additional space for sports centres. (SE)

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Appendix 3 Site Allocation Details	39 UC084 Land south of Sewage Works	1	5	SARG	Greenways Project Natural England SCC Crest Nicholson Suffolk Wildlife Trust	<ul style="list-style-type: none"> Support non-allocation but should add site to existing country parks and managed for wildlife.
Appendix 3 Site Allocation Details	40 UC087 83/85 Dales Road	8	1	Ashfield Land Mr Ling, LM Marshall, VE Derrett, VG Wharr, RD Beales, GA Read, DB Brett	Crest Nicholson R Payne	<ul style="list-style-type: none"> Site ideal for housing development preferably bungalows. Proposed development would lead to parking problems and congestion. Support allocation but should be light industry.
Appendix 3 Site Allocation Details	41 UC092 345 Woodbridge Road	2	1	Crest Nicholson A Leathley	Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> Proposed density too high. Need to address existing parking problems.
Appendix 3 Site Allocation Details	42 UC095 79 Cauldwell Hall Road	0	1		Crest Nicholson	<ul style="list-style-type: none"> Support
Appendix 3 Site Allocation Details	43 UC106 Morpeth House, 97-99 Lacey Street	22	1	The Ipswich Society Suffolk Wildlife Trust Crest Nicholson Cllr D Ellesmere IBC Labour Group & 17 Individuals	Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> Not clear whether existing building is to be demolished or rest of the site is to be developed. Site assessment and ecological survey to be carried out before the development commences. Site suffering from poor drainage and water seepage problems. Proposed development would lead to additional traffic demands, parking problems and congestion. Proposed development would lead to loss of refuge for birds and wildlife. (SWT) <p>Cont'd ...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Council has to have regard to biodiversity under the NERC Act 2007. (SWT) • Proposed development would lead to loss of an important historical and architectural building. • Property sited on a landfill consultation zone. • Loss of privacy and light for adjoining houses. • Retain as existing use. • Existence of mature trees and TPOs on the site. • Unnecessary strain on local health and community services. • Site has risk of flooding. • Site should be used as a car park retaining existing buildings and trees. • Proposed density too high.
Appendix 3 Site Allocation Details	44 UC110 Telephone Exchange, Portman Road	6	0	English Heritage Mersea Homes, IBC Labour Group Crest Nicholson SCC David Wilson Homes		<ul style="list-style-type: none"> • Site adjoins conservation area and listed buildings. (EH) • Proposed density too low. • Proposed development would lead to additional traffic demands, parking problems and congestion. • Site within landfill consultation zone. • Retain as existing use. • Site costly to redevelop due to existing telecomm infrastructure constraints.
Appendix 3 Site Allocation Details	45 UC113 Part former Volvo site, Raeburn Road south	2	1	Gainsborough Retail Park Ltd.	IBC Labour Group	<ul style="list-style-type: none"> • Wish to see more retail or a mix of retail and residential on the site.
Appendix 3 Site	46 UC114 6-24 Defoe	10	0	Mersea Homes, Crest Nicholson &		<ul style="list-style-type: none"> • No proper access to the site. • Retain as existing use.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Allocation Details	Road			David Wilson Homes (joint) Cllr Steven Wells IBC Labour Group TJ Silvester, AM & DM Burton. JE Ruffles, JR Clark, GV Edmunds		<ul style="list-style-type: none"> Proposed density too high. Proposed development would lead to additional traffic demands and parking problems due to proximity to major junction. Multiple ownership of land and many not willing to sell. Further shortage of social housing if any of the properties are knocked off for creating access.
Appendix 3 Site Allocation Details	47 UC115 Rear of Stratford Road and Cedarcroft Road	5	1	Crest Nicholson E Saker, PR Girling, GRYoung, Mr Mitchell	Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands and parking problems. Poor access to the site. Multiple ownership of the site. Loss of privacy and light for adjoining houses. Retain as existing use.
Appendix 3 Site Allocation Details	48 UC120 Henniker Road (rear of 668-730 Bramford Road)	15	1	Bramford Parish Council Mersea Homes, Crest Nicholson & David Wilson Homes (joint) IBC Labour Group & 10 Individuals	T Furzer	<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands and parking problems. Loss of privacy and light for adjoining houses. Poor access to the site. Loss of private amenity space for existing residents. Loss of privacy and light for adjoining houses. Retain as existing use. Multiple ownership of the site.
Appendix 3 Site Allocation Details	49 UC125 32 Larchcroft Road	6	1	Greenways Project Mersea Homes, Crest Nicholson & David Wilson Homes (joint) A Harvey, Mr & Mrs Andrews	M Jackaman	<ul style="list-style-type: none"> Site assessment and ecology survey to be carried out before the development commences. Loss of privacy and light for adjoining houses. <p>Cont'd...</p> <ul style="list-style-type: none"> Proposed development would lead to additional traffic demands and parking problems.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Retain as existing use. • Poor access and constrained layout not ideal for housing development.
Appendix 3 Site Allocation Details	50 UC128 301-305 Norwich Road	8	0	East of England Co-op Society Planning Potential Glyn Hopkin Ltd. Mersea Homes, IBC Labour Group David Wilson Homes Crest Nicholson F Yates		<ul style="list-style-type: none"> • Proposed density low. • Site better suited for mixed use with residential and commercial uses. • Proposed development would lead to loss of jobs. • Retain as existing use. • Alternate sites for replacement of existing activities not identified. • Proposed development would lead to additional traffic demands and parking problems. • Property sited on a landfill consultation zone.
Appendix 3 Site Allocation Details	51 UC129 Depot, Beaconsfield Road	5	2	IBC Labour Group Mersea Homes, Crest Nicholson & David Wilson Homes (joint) SCC, R & M Ward	Greenways Project Inland Waterways Association Ipswich branch	<ul style="list-style-type: none"> • Site has risk to flooding. • Property sited on a landfill consultation zone. • Retain as existing use. • Support allocation subject to appropriate flood defence works. • Support housing but should make use of pedestrian walkway and cycle path along the river.
Appendix 3 Site Allocation Details	52 UC130 Rear of Riverside Road / Bramford Road	7	1	Bramford Parish Council IBC Labour Group Suffolk Wildlife Trust Mersea Homes, Crest Nicholson & David Wilson Homes (joint) MVL Contreras, R Nunn, L Smith	Crest Nicholson	<ul style="list-style-type: none"> • Proposed development would lead to additional traffic demands and parking problems. • Site assessment and ecology survey to be carried out before the development commences.(SWT) • Council has to have regard to biodiversity under the NERC Act 2007. (SWT) • Retain the site as open space. <p>Cont'd...</p> <ul style="list-style-type: none"> • Proposed density high. • Site has risk to flooding.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> Property sited on a landfill consultation zone. Support allocation subject to access being acceptable.
Appendix 3 Site Allocation Details	53 UC132 Rear of 601-655 Bramford Road	27	2	Bramford Parish Council Highways Agency SCC IBC Labour Group Crest Nicholson David Wilson Homes & 21 Individuals	Mr & Mrs Ayles WR Moffatt	<ul style="list-style-type: none"> Loss of privacy and light for adjoining houses. Proposed development would lead to additional traffic demands, congestion and parking problems. Transport assessment required before any development commences. Retain the site as existing. Proposed density high. Loss of trees and plants. Site suffering from poor drainage and excess water causing flooding. Multiple ownership of land and many not willing to sell. Houses would be devalued.
Appendix 3 Site Allocation Details	54 UC148 Builders Yard, Vermont Crescent	4	0	Mersea Homes, Crest Nicholson & David Wilson Homes (joint) AB Parry, D Chittock		<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands, congestion and parking problems. No proper access to the site. Proposed density high. Site within landfill consultation zone. Retain existing use.
Appendix 3 Site Allocation Details	55 UC156 Rear of Jupiter Road & Reading Road	9	1	Greenways Project Mersea Homes, Crest Nicholson & David Wilson Homes (joint) E Phillips, G Dickson, L Trusler, Mr & Mrs Stevens,	Roxburgh Roofing	<ul style="list-style-type: none"> Retain existing open space. Loss of employment area. Proposed density too high. No proper access to the site. Loss of privacy and light for adjoining houses. <p>Cont'd...</p> <ul style="list-style-type: none"> Proposed development would lead to additional traffic demands, congestion and parking problems.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				K Maly		<ul style="list-style-type: none"> • Site within landfill consultation zone.
Appendix 3 Site Allocation Details	56 UC157 14 Crofton Road	12	0	SCC Mersea Homes, Crest Nicholson & David Wilson Homes (joint) E Phillips, R Nunn, MW & FM Stow, PW Smith, AR Mann, A Leathley, J Corbett, K Golding		<ul style="list-style-type: none"> • Multiple ownership of land. • Loss of vital green area. • Proposed density too high. • Proposed development would lead to additional traffic demands, congestion and parking problems. • Site within landfill consultation zone. • Site is partially Greenfield. • Site is tended kitchen garden and not intended to be sold off. • Wish to see family housing rather than flats.
Appendix 3 Site Allocation Details	57 UC167 Club, Newton Road	17	0	Sport England-East Mersea Homes, Crest Nicholson & David Wilson Homes (joint) Newton Road Conservative Club IBC Labour Group K Watling, H Atkins, W Hignett, D Atkins, D Vincent, MA Atkins, AM Uren, TS & LN Simper & Cowley, EL Smith Wherry Housing Association		<ul style="list-style-type: none"> • Alternate sites for replacement of existing activities not identified. • Proposed development would lead to additional traffic demands, congestion and parking problems. • Loss of public recreational facility. • Unnecessary strain to existing infrastructure and services. • Retain existing use. • Owners not willing to sell their property.
Appendix 3 Site	58 UC170 2 & 4 Derby Road	3	0	Mersea Homes, Crest Nicholson &		<ul style="list-style-type: none"> • Retain existing use. • Loss of employment area.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Allocation Details				David Wilson Homes (joint)		<ul style="list-style-type: none"> • Alternate sites for replacement of existing activities not identified.
Appendix 3 Site Allocation Details	59 UC171 The Railway PH and 245 Foxhall Road	0	2		Mersea Homes, Crest Nicholson & David Wilson Homes (joint) Crest Nicholson	<ul style="list-style-type: none"> • Supporting comments.
Appendix 3 Site Allocation Details	60 UC172 Rear of Cauldwell Hall Road and Kemball Street	17	2	Mersea Homes, Crest Nicholson & David Wilson Homes (joint) IBC Labour Group Cllr D Ellesmere, Cllr S Martin & 11 Individuals	Ian Dickson Ltd. R Davies	<ul style="list-style-type: none"> • Loss of privacy and light for adjoining houses. • Multiple ownership of land not willing to see their properties. • Proposed development would lead to additional traffic demands, congestion and parking problems. • Retain existing use. • No proper access to the site. • Proposed density too high. • Risk of flooding. • Loss of employment land, which is in good use. • Possible loss of wildlife.
Appendix 3 Site Allocation Details	61 UC180 547 Foxhall Road and land to rear	12	0	Ipswich Model Engineering Society SCC IBC Labour Group Mersea Homes, Crest Nicholson & David Wilson Homes (joint) Scout Group-Ipswich, Cllr S Martin, DM Jones, JG Pearse, AJ		<ul style="list-style-type: none"> • Alternate sites for replacement of existing activities not identified. • Site boundary needs to be reviewed, as it appears to encroach into site of Copleston High School. (SCC) • Loss of community facilities and school playing fields. • Loss of privacy and light for adjoining houses. <p>Cont'd...</p> <ul style="list-style-type: none"> • Proposed development would lead to additional traffic demands, congestion and parking problems.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Goldsmith, C Millis		<ul style="list-style-type: none"> • Retain existing use. • Poor access to site. • Site owned by Ipswich Model Engineering Society with a trust deed of 60 years standing. • Multiple use of site. • Price and saleability of existing properties would plummet. • Tram stop should be provided to reduce road use. (IS)
Appendix 3 Site Allocation Details	62 UC185 St Clements Hospital Grounds	155	4	Highways Agency, Sport England – East Region, SCC Environment Agency, Birketts LLP, Rushmere St Andrew Parish Council, Ipswich Hospital Bowls Club, Suffolk Mental Health Partnership NHS Trust, Ipswich Hospital NHS Trust, Mersea Homes, Crest Nicholson & David Wilson Homes (joint) , Unite the Unions, IBC Labour Group, Cllr D Ellesmere, Cllr S Martin, SCC & 140 individuals.	Greenways Countryside Project, The Ipswich Society, The Kesgrave Covenant Ltd. PM Hemingway	<ul style="list-style-type: none"> • Transport assessment required before development commences. (HA & SCC) • Alternate sites for replacement of existing activities not identified. (SE) • Serious impact on wildlife corridor. (EA) • Proposed development along with other potential housing areas will have significant implications on provision of school places. (SCC) • Site partly to be developed for housing and remaining for open space/ community/ leisure use. • Loss of associated jobs, open space, wildlife and trees as Green Lung. • Unnecessary strain to existing infrastructure and services. • Proposed density too high. • Proposed development to be phased to ease off pressure on water resources. (EA) • Loss of sports and social ground. • Retain existing use. • Loss of rainwater to reserves due to hard surfaces. <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Land should be used for leisure/ public open space rather than housing, in case the hospital closes down. • Storm water drainage a critical problem. • Highways need further enhancement as part of redevelopment process until then deliverability is seriously questioned. • Development should be in combination with UC262 with housing and public open space uses. • Ecological assessment required to ensure protection of wildlife (bats and reptiles). • SCC has suggested a site of 4 acres reserved in the site UC010 as part of s106, should this site be approved for development.
Appendix 3 Site Allocation Details	63 UC192 Rear of Allenby Road and Hadleigh Road	4	1	IBC Labour Group Mersea Homes, Crest Nicholson David Wilson Homes Cllr D Ellesmere	S Ahmed	<ul style="list-style-type: none"> • Multiple ownership of land. • Poor access to site. • Retain existing use. • Site within landfill consultation zone.
Appendix 3 Site Allocation Details	64 UC209 Front of Pumping Station, Belstead Road	12	0	Greenways Project Mersea Homes, Crest Nicholson & David Wilson Homes (joint) Stoke Park Residents Association NWA Planning A Long, R Kirby, K Purnell, C Carter, A Lee, JD Carnell, M Garnham		<ul style="list-style-type: none"> • Poor access to site. • Proposed development would lead to additional traffic demands, congestion and parking problems. • Retain existing use. • Loss to vital public utility service. • Loss of privacy and light for adjoining houses • Proposed density too high. • Site topography and existing boreholes a constraint in development. • Part allocation for semi-natural open space.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Appendix 3 Site Allocation Details	65 UC213 Rear of 17-27 Ramsey Close (Wigmore Close)	34	1	Stoke Park Residents Association Mersea Homes, Crest Nicholson & David Wilson Homes (joint) & 30 Individuals	L Norris	<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands, congestion and parking problems. Loss of privacy and light for adjoining houses. Adverse effects on the amenities of the area. Proposed density too high. Multiple ownership of land and owners not willing to sell. Retain existing use. No road frontage.
Appendix 3 Site Allocation Details	66 UC229 100 Clapgate Lane	25	2	Greenways Project, IBC Labour Group, Mersea Homes, Crest Nicholson, David Wilson Homes (joint) P & C Levick supported by petition & 21 other individuals	A Leathley, K Rust	<ul style="list-style-type: none"> Proposed density too high. Narrow frontage of site. Loss of habitat for wildlife such as frogs, toads, newts, stag beetles etc. Access is dangerous - next to an old people's home and entrance to the park Overlooking of surrounding properties The land floods from Clapgate Lane Refuse to give up garden Out of character with surrounding area Clapgate Lane is quite narrow and is often heavily parked Loss of environmental quality for the existing houses Adverse impact on the conservation area and wildlife in the adjacent park The land is already in active use Loss of trees Development would compromise the security of the existing dwellings Should use empty buildings before taking garden land <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Support allocation but should be lower density – 6 dwellings and 10 dwellings both suggested • Would affect property values • Development would cause anxiety to elderly residents • Site unlikely to come forward because of multiple ownerships
Appendix 3 Site Allocation Details	67 UC230 Corner of Hawke Road and Holbrook Road	2	0	Mersea Homes, Crest Nicholson & David Wilson Homes (joint)		<ul style="list-style-type: none"> • Site within landfill consultation zone. • Retain existing use. • No evidence of existing user's relocation.
Appendix 3 Site Allocation Details	68 UC231 251 Clapgate lane	4	2	Tree House Family Forum, Sure Start Tree House Children's Centre, IBC Labour Group, Crest Nicholson	Ormiston Children & Families Trust, Mersea Homes, Crest Nicholson & David Wilson Homes (joint)	<ul style="list-style-type: none"> • Retain existing use. • Loss of play area for children/ community use. • Site within landfill consultation zone.
Appendix 3 Site Allocation Details	69 UC234 15-39a Bucklesham Road	34	0	Greenways Countryside Project Environment Agency, Mersea Homes, Crest Nicholson & David Wilson Homes (L&P) Ltd (on behalf of Mersea Homes, Crest Nicholson & David Wilson Homes IBC Labour Group,		<ul style="list-style-type: none"> • Unnecessary strain on existing infrastructure. • Negative impacts on the environment. • Loss of habitat with potential wildlife. • Retain existing use. • Proposed development would lead to additional traffic demands, congestion and parking problems. • Proposed development to be phased to ease off pressure on water resources. • Possible contamination in the ground water. • Possible risk of flooding and subsidence. • Multiple ownership of land. • Site within landfill consultation zone.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Crest Nicholson, Suffolk County Council, David Wilson Homes, and 22 Individuals		
Appendix 3 Site Allocation Details	68 UC236 Former Driving Test Centre, Woodbridge Road	3	2	Henry Cooper, IBC Labour Group	Mersea Homes, Crest Nicholson & David Wilson Homes Ltd Crest Nicholson	<ul style="list-style-type: none"> Proposed density too high.
Appendix 3 Site Allocation Details	69 UC237 BT Depot, Woodbridge Road	5	0	Henry Cooper IBC Labour Group, Crest Nicholson		<ul style="list-style-type: none"> Proposed density too high. Site fully operational. Redevelopment of land to be expensive.
Appendix 3 Site Allocation Details	70 UC246 South of Bramford Road	3	4	Bramford Parish Council, Suffolk Wildlife Trust, IBC Labour Group	River Action Group, Mersea Homes, Crest Nicholson & David Wilson Homes Ltd, Crest Nicholson	<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands, congestion and parking problems. Proposed density high. Council has to have regard to biodiversity under the NERC Act 2007. Site within landfill consultation zone. Possible risk of flooding.
Appendix 3 Site Allocation Details	71 UC250 112-116 Bramford Road	4	0	Bramford Parish Council, Mersea Homes, Crest Nicholson & David Wilson Homes Ltd Crest Nicholson, SCC (Caroline Keen)		<ul style="list-style-type: none"> Proposed development would lead to additional traffic demands, congestion and parking problems. Possible risk of flooding. Listed building near site. Proposed density high.
Appendix 3 Site	72 UC252 Running Buck	13	1	English Heritage, Bethesda	Mersea Homes, Crest Nicholson &	<ul style="list-style-type: none"> Site adjoins conservation area and listed buildings. Retain existing use.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Allocation Details	PH, St Margaret's Plain			Community Charitable Trust (Charles Clarke), Bethesda Baptist Church, Bethesda Community Charitable Trust (S Sherman IBC Labour Group, Crest Nicholson Rest Individuals	David Wilson Homes Ltd	<ul style="list-style-type: none"> Proposed density too high. Possible risk of flooding.
Appendix 3 Site Allocation Details	73 UC257 Land north of Whitton Lane	0	3	Greenways Countryside Project, Edward Phillips, SCC (Caroline Keen)		<ul style="list-style-type: none"> Supporting comments
Appendix 3 Site Allocation Details	74 UC258 Cranes Site	4	2	Rowland Shaw, EEDA, Andrew Martin Associates, SARG	Greenways Countryside Project, R J Kemp	<ul style="list-style-type: none"> The identification of Cranes is a positive step in planning for employment growth but the Council should consider how it relates to other regional priority sites e.g. Adastral Park (EEDA) Transport assessment required before development commences. Site survey to be conducted properly before any development commences.
Appendix 3 Site Allocation Details	75 UC260 Former Norsk Hydro Site, Sandy Hill Lane	5	1	Greenways Countryside Project, Ashfield Land, Gainsborough Retail Park Ltd, SCC (Caroline	IBC Labour Group,	<ul style="list-style-type: none"> Land has not much demand for employment use.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Keen)		
Appendix 3 Site Allocation Details	76 UC261 Wooded area and large verge, Birkfield Drive	0	3		Greenways Countryside Project, I McKie, SCC (Caroline Keen)	<ul style="list-style-type: none"> Supporting comments.
Appendix 3 Site Allocation Details	77 UC262 St Clements Golf Course	2	10	The Ipswich Society, The Kesgrave Covenant Ltd	Greenways Countryside Project, Sport England – East Region, Sandy Martin, Suffolk Wildlife Trust, Unite the Unions, IBC Labour Group, SCC (Caroline Keen) Rest Individuals	<ul style="list-style-type: none"> Site more suitable for housing and public open space. The existing use would be redundant once the St Clements Hospital site is vacated.
Appendix 3 Site Allocation Details	78 UC263 Ransomes Europark (east)	3	1	Greenways Countryside Project, Rowland Shaw, SARG	Strutt & Parker	<ul style="list-style-type: none"> Site partly to be allocated for semi-natural green space or wildlife area. Reptile survey to be carried out on the site. Site more suitable for mixed-use development.
Appendix 3 Site Allocation Details	79 UC264 Between railway junction and Hadleigh Road	7	1	Greenways Countryside Project, The Ipswich Society, SCC (Rachel Collins), I McKie, Suffolk Wildlife	Inland Waterways Association Ipswich Branch	<ul style="list-style-type: none"> Site partly to be allocated for semi-natural green space along the river as public recreational area. Public access to be restricted only to the North bank of the river. Reptile survey to be carried out on the site.

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
				Trust, SARG, SCC (Caroline Keen)		
Appendix 3 Site Allocation Details	80 UC265 Land south of the A14	0	4		Greenways Countryside Project, Natural England, SCC (Rachel Collins), SARG	<ul style="list-style-type: none"> Supporting comments
Appendix 3 Site Allocation Details	81 UC266 Land at Pond Hall Farm, south of the A14	0	6		Greenways Countryside Project, Natural England, SCC (Rachel Collins), I McKie, Suffolk Wildlife Trust, SARG	<ul style="list-style-type: none"> Site partly to be allocated for semi-natural green space to protect bio-diversity.
Appendix 3 Site Allocation Details	82 UC267 Land south of Ravenswood	0	5		Natural England, SCC (Rachel Collins), I McKie, Suffolk Wildlife Trust, SARG,	<ul style="list-style-type: none"> Supporting Comments
Appendix 3 Site Allocation Details	83 UC268 Lister's, Landseer Road	1	0	Ashfield Land		<ul style="list-style-type: none"> The site is already in use as employment.
Appendix 3 Site Allocation Details	84 UC269 Airport Farm Kennels, north of A14	6	0	Henry Cooper, SCC (Rachel Collins), Turley Associates, D Hobbs		<ul style="list-style-type: none"> Transport assessment to be undertaken to evaluate potential impacts on highways <p>Cont'd...</p>

Chapter	Policy Area / page / para / Site	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Robust travel plan required. • Site designated as countryside and partly falling within Area of Outstanding Natural Beauty. • Proposed development will preclude any future construction of East Bank Link Route, which is vital for success of the town.
Appendix 3 Site Allocation Details	85 UC272 Halifax Road Sports Ground	0	4		Sport England – East Region, SCC (Rachel Collins), I McKie, Steve Rudkin	<ul style="list-style-type: none"> • Supporting comments

Table 4: Preferred Options Analysis – Sustainability Appraisal

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Whole Document	-	4	0	Go East Environment Agency, Mersea Homes, David Wilson Homes		<ul style="list-style-type: none"> • Questionable that the SA states that no issues have arisen from the Preferred Options that are considered to have a significant impact on the Stour and Orwell Estuaries SPA and RAMSAR. (EA) • Referring to comments by Anglian Water in the Site Allocations DPD that the treatment works are currently at capacity and the off-site infrastructure works are required for water supply networks and sewage treatment – further residential development may overload the system with implications for the designated Orwell European site. (EA) • Development should not take place before any required improvements are carried out as advised by the Haven Gateway Water Cycle Study which will inform the assessment of the capacity of the existing sewage infrastructure to cope with levels of development. (EA) • It is not explicitly evident from reading the Core Strategy that the findings of the SA report support the Authority’s preferred options and how decisions about the spatial strategy have been reached. (GO East) • Relationship between ‘Summary of issues and options consultation results’ and ‘Comments on other possible approaches’ is unclear and does not state whether stakeholders and the community had the opportunity to comment on the other possible approaches. • There is little relationship with the Preferred Options and the Sustainability Appraisal as the LDF evaluation has taken place in advance of the evidence gathering stage, therefore there is no indication that it has informed the Preferred Options. <p>Cont’d ...</p>

Chapter	Sub-section	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • SA is seriously flawed in its approach to the following key areas: Flood risk / climate change; Government Planning Policy; Chain of Conformity; Evaluation of options; Missing Evidence. • SA has avoided its duty (PPS12) to undertake robust evaluation, but has supported the Preferred Options without evidence or in many instances in spite of it. • Concern that the SA has not been informed by the necessary evidence base which has prevented a full appraisal being undertaken.
Section A Non-Technical Summary	1 Summary Comments on whole Section	3	0	Stephen Marginson, Mersea Homes		<ul style="list-style-type: none"> • Strategies do not provide any sound basis for reducing traffic and pollution, improving traffic flow or improving sustainable transport and cycle and pedestrian facilities. • Disagree with the proposal that weakness with regard to weakest sustainability can easily be dealt with by strengthening the final wording of policy. • Both policy and spatial strategy should be reviewed to take account of the impact of climate change in accordance with government policy. • SA should confirm that proposals which do not conform to government planning policy cannot be considered as being sustainable. • The assumption that positive impacts can be maintained, as flood risk can be mitigated by the flood barrier and short term design mitigation, is flawed as the flood barrier has not been constructed. If constructed the flood barrier will not change the existing zone 3 designation. • Cannot accept that flood barrier would mitigate against risk of flooding, this is directly contrary to PPS1, PPS 25 and the Environment Agency standing advice.

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Section A Non-Technical Summary	1.4 Site Allocations & Policies	0	1		RSPB	<ul style="list-style-type: none"> • Agree with findings that ecological value of sites should be assessed
Section B Introduction	3 Method of Assessment	2	0	Environment Agency		<ul style="list-style-type: none"> • The regional quality assurance checklist under chapter 23 should be placed towards the front of the SA report (EA) • The SA report should incorporate a table that demonstrates how the SA objectives, suitably grouped, relate to the SEA themes (EA) • The SA guidance requires consideration of the effect of an option, policy or proposal on an objective. Assessing a topic area only arguably does not entirely meet with the SA guidance (EA) • Only being able to appraise the topic areas as opposed to draft policy wording represents a technical deficiency. (EA)
Section B Introduction	3.8 Appropriate Assessment	2	1	Environment Agency Mersea Homes	RSPB	<ul style="list-style-type: none"> • The Council should re-consider carrying out an appropriate assessment to assess the potential effect of development on the European sites (EA) • The construction of the flood barrier will give rise to a possibility of secondary impact on the lower reaches of the River Orwell possibly affecting the Stour and Orwell Special Protection Areas. • SA should appraise of the Preferred Options on a precautionary basis that the flood barrier is not currently funded or programmed • Agree with finding that sites near the SPA may need appropriate assessment (RSPB)

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
Section B Introduction	4 State of the Environment	2	0	GeoSuffolk, Environment Agency,		<ul style="list-style-type: none"> • There is a paucity of information on the state of environmental assets such as wildlife sites and watercourses within the Council's area (also suggest sources of data) (EA) • Data obtained from the regular air monitoring should form part of the baseline evidence. (EA) • Lack of information on geodiversity. Section should be split into landscape, biodiversity and geodiversity. • Baseline information needs to be collected regarding local sites of geodiversity interest and geodiversity in the wider environment as per PPS9.
Section B Introduction	4.4 Limitations of Information, & Assumptions	2	0	GeoSuffolk, Mersea Homes		<ul style="list-style-type: none"> • Baseline information needs to be collected regarding local sites of geodiversity interest and geodiversity in the wider environment • Some documents are missing or out of date, including: SHMA; SHLAA; Strategic Flood Risk Assessment; an up to date Annual Monitoring Report – more appropriate judgements could be made if such data was available.
Section B Introduction	5 Sustainability Objectives and Criteria	2	0	GeoSuffolk, Environment Agency		<ul style="list-style-type: none"> • Table 5.1 Should include reference to the Suffolk Geodiversity Action Plan • Table 5.2 should include biodiversity as part of Sustainability Appraisal • The Council should take into consideration the recently adopted Planning and Climate Change Supplement to PPS1 (EA) • Framework differs slightly from that agreed by the Suffolk Sustainability Appraisal Group.
Section B Introduction	5.3 The SA Framework	2	0	GeoSuffolk		<ul style="list-style-type: none"> • Geodiversity and biodiversity should be included

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Section C Core Strategy	6 Main Objectives, and general comments on Section C	7		Environment Agency, GeoSuffolk Crest Nicholson, S Marginson Mersea Homes		<ul style="list-style-type: none"> • Should clarify whether scores given in Table 6.1 are derived from Table 6.2 (EA) • Table 6.2 should include a score entry for Objective 3 (EA) • Carry out comparison of Core Strategy objectives and Sustainability Appraisal objectives for geodiversity as well as biodiversity. • Amend SA for Objective 7 to include impact of flood defences on biodiversity. • It is not clear how the findings of the draft Ipswich SFRA have informed the SAs in terms of the proposals to re-use brownfield sites in high risk flood areas (EA) • Any scoring derived from the draft Ipswich SFRA is arguably subjective without the benefit of hazard mapping. (EA) • Sustainability assessment of the Core Strategy Vision is not provided. • No alternatives provided for sustainability of the Core Strategy objectives. • Objectives are not grounded in reality. • The sustainability appraisal makes poor reading when dealing with carbon footprint, air quality and sustainable transport – need a policy for this • Geodiversity may be harmed as well as biodiversity by objective 3 if housing development coincides with designated sites and wider areas of geodiversity sensitivity / vulnerability. • Geodiversity and biodiversity may also be harmed by objective 7 if flood protection necessitates the artificial landforms, which alter fluvial and estuarine landforms and therefore habitat, and also affect the active geomorphological processes that maintain them. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • The wording of both the title ‘links with national policy’ and the text ‘in the context of national policy’ is insufficiently strong and fails to address the test of consistency with national policy. • Not consistent with national planning policy in proposing new development in Ipswich’s waterfront flood risk zones. • SA should recognise that para 7.52 of the Core Strategy fails to comply with emerging RSS Policy H1. • Table 6.2 makes no comment in relation to development locations in the context of reducing vulnerability to flooding. • Comparison of ET7 and objective 7 gives a positive score for aim to protect the town from flooding. This is flawed on the basis that the Ipswich flood defence barrier is neither approved, funded nor built and therefore should not be relied upon in the assessment of flood risk. • SA should identify the risks of flooding in accordance with the preparation of a Strategic Flood Risk Assessment.
Section C Core Strategy	7 Policy Alternatives 8 Significant Effects, incl. Comments on the Policy Areas	43	0	Environment Agency, GeoSuffolk, Mersea Homes, Crest Nicholson, David Wilson Homes,		<ul style="list-style-type: none"> • Level of detail provided in table 8.1 not provided for alternative options, therefore does not show full justification. • Scoring is inconsistent and unjustified. • There is a lack of depth displayed in the analysis of key policy areas, leading to superficial or potentially erroneous conclusions. <p>Policy Area 1 Approach to Sustainable Development</p> <ul style="list-style-type: none"> • A number of policy areas seem to have sustainability that is unjustified. • ET 2 - It is not clear how carbon neutral developments will “conserve soil resources and quality”. <p>Cont’d...</p>

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • ET 7 & 8 - It is not clear how carbon neutral developments will “conserve and enhance biodiversity” and “protect and enhance favourable conditions on SSSIs, SPAs and SACs. <p>Policy Area 2 Location of development</p> <ul style="list-style-type: none"> • ET 7 – Locational principles proposed will directly increase “vulnerability to climatic events and increasing sea levels” to a very strong degree, as this area is already vulnerable to flooding. • ET 9 – High density development within IP-One will not conserve Ipswich’s sites of historical interest. • HW 1 – High density focus will not deliver types of homes needed by vulnerable groups of society. • HW 2 – Suggested correlation between quality of life where people live and community participation is not explained. • ER 1 – No proven correlation between aims to “reduce poverty and social exclusion” and PA2 aims to focus development within IP-One. • ER 2 – No proven correlation between offering everybody the opportunity for rewarding and satisfying employment and PA2 aims to focus development within IP-One. • ER 3 – A strategy which continues to focus on high density city flats will not meet the housing requirements of the whole community. • Development centred in locations that include the Waterfront includes flood zones and therefore fails to conform to national planning policy. <p>Cont’d...</p>

Chapter	Sub-section	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • Alternative approaches identified do not have evidence presented to demonstrate their viability, or that they can accommodate the necessary minimum levels of housing and other essential development. <p>Policy Area 3 Mixed Use Development</p> <ul style="list-style-type: none"> • ET 1 – Correlation is unclear/unproven. • HW 1 – Focus on high density will not deliver types of homes needed for vulnerable groups of society. • ER 2 – No proven correlation. <p>Policy Area 5 Urban Design</p> <ul style="list-style-type: none"> • SA suggests that the preferred option, which sought not to include a specific policy on Urban Design on the basis that such a policy would be a repetition of PPS1, is outscored by Option A which considered the possibility of including such a policy. <p>Policy Area 6 Ipswich Policy Area</p> <ul style="list-style-type: none"> • Supports focus on IP-One at the expense of joint working with the other Councils of the IPA. • ET 1 – Positive correlation unexplained and unclear. • ET 7 – There will be a negative effect on ET7, Sustainability Appraisal suggests no relationship but since IP-One is in a flood risk area, we consider that there is likely to be a strong negative correlation. • HW 1 - Focus on high density will not deliver types of homes needed by vulnerable groups of society. • ER 1 – Positive correlation is not explained. • ER 2 – Positive correlation is not explained. • ER 3 – No proven correlation and positive correlation is not explained. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • ER 4 – Focusing development to the centre of Ipswich taking up existing employment land, is unlikely to lead to sustainable levels of prosperity and growth. • ER 6 – Focusing development to the centre of Ipswich is likely to lead to congestion which will not lead to efficient patterns of movement and economic growth. <p>Policy Area 7 Amount of Housing</p> <ul style="list-style-type: none"> • ER 3 – Sufficient land has not been allocated to meet the housing need, therefore this preferred option cannot be assessed as meeting this policy objective. <p>Policy Area 8 Balance between Flats and Houses</p> <ul style="list-style-type: none"> • ET 1 – Positive correlation is unexplained and unclear. • ET 6 – Positive correlation is unexplained and unclear. • ET 7 – SA suggests a weak negative relationship but since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree. • HW 1 - Focus on high density will not deliver types of homes needed by vulnerable groups of society. • ER 1 – Positive correlation is not explained. • ER 2 – Positive correlation is not explained and the policy area aims to focus development of housing on high density sites which will result in the loss of much employment land. • ER3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community. • ER 4 – Focusing development to the centre of Ipswich taking up existing employment land, is unlikely to lead to sustainable levels of prosperity and growth. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • ER 6 – Focusing development to the centre of Ipswich is likely to lead to congestion which will not lead to efficient patterns of movement and economic growth. • Policy is predicated on the suitability of a housing trajectory which is almost entirely dependent on the delivery of a disproportionately high balance of apartments. • SA fails to acknowledge considerable property market and the particular problems of oversupply in Ipswich. • Should have been informed by a SHMA • A number of sites for high density flats fall within flood risk zones and will need to be reconsidered in light of a sequential approach. <p>Policy Area 9 Residential Density</p> <ul style="list-style-type: none"> • Negative side of higher density development is not examined. Appraisal is overly simplistic and unbalanced, leading to exaggerated conclusion. • ET 1 – Positive correlation is unexplained and unclear. • ET 6 – Positive correlation is unexplained and unclear. • ET 7 – SA suggests a weak negative relationship but since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree. • HW 1 - A focus on high density will not deliver types of homes required for healthy living for vulnerable groups of society. • ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community. <p>Cont'd...</p>

Chapter	Sub-section	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<p>Policy Area 10 Previously Developed land</p> <ul style="list-style-type: none"> • ET 1 – Positive correlation is unexplained and unclear. • ET 7 – Since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree. • ET 9 – It is not clear how high density brownfield redevelopment is directly correlated with preserving sites of historic interest. • HW 1 – Maintaining a focus on developments on brownfield sites will not deliver the type of low density homes required for healthy living. • ER 1 – Positive correlation is not explained. • ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community. • ER 6 – Focusing development to the centre of Ipswich is likely to lead to congestion which will not lead to efficient patterns of movement and economic growth. <p>Policy Area 11 Greenfield Land</p> <ul style="list-style-type: none"> • ET 1 – Analysis presented demonstrates a complete lack of understanding as to the principles of development in the Northern Fringe and an ignorance of the volumes of technical information that have been submitted in support of this location in the past. • ET 1 - An analysis that presents one wrong conclusion for Option A and provides no equivalent assessment of the other 3 Options, is wholly unacceptable. • ET 1- Delaying or preventing development of the northern fringe will result in a higher concentration of development in the central Ipswich area. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • ET 1 – Analysis does not reflect the potential negative effect on local air quality caused through high levels of new development and increased urbanisation in central areas. • ET1 – All new housing across the borough will generate travel demand • ET 2 – Cannot see any logic in different approaches to the three options as they all relate to an area of greenfield land, any difference relates to the timing not the impact. • ET 2 – In seeking to defer such an allocation until post 2021 the soundness of the Core Strategy is risked and also the impact of development in central areas is exacerbated. • ET 2 – Reference should have been made to the agricultural land reports in respect of the land east and west of Westerfield Road • ET 3 – Option A results in no more new housing than any of the other options • ET 3 – Amount of waste per household post - construction would not be greater in the Northern Fringe than anywhere else. • ET 4 – The Northern Fringe offers excellent potential for reducing traffic generation in new development and the environmental effects of traffic generation from excessive urban intensification would be more harmful. • ET 5 – SA presents no analysis of the Northern Fringe’s potential for increased access to services and the urban concentrations strategy decreasing access to services. • ET 6 – The analysis repeats the mistaken belief that the Northern Fringe results in more housing. • ET 6 – Opportunity for energy efficiency savings offered in the Northern Fringe is ignored. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supports	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • ET 7 – Since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree. • ET 7 – Rather than a positive for Option A, a more accurate analysis would be a negative entry for the other Options and a double negative for Option C. • ET 8 – Would expect the biodiversity of the Northern Fringe to be enhanced as a result of the development and the current negative for option A should be neutral if not positive. • ET 8 – Suggestion that land would remain derelict for Option B highlights a lack of knowledge of the area. • ET 8 – Sweeping assertion that brownfield sites have greater biodiversity potential than greenfield sites. • ET 9 – Available evidence suggests the complete opposite of that set out in the SA and Option C would result in greater levels of development in the areas of greatest archaeological sensitivity. • ET 10 – Lack of broader perspective on impacts and a concentration only on the landscape rather than the townscape impacts of the alternatives. • ET 11 – Unsure why the appraisal records a zero impact against the Preferred Option but not in relation to any of the other options. • HW 1 – No analysis is presented, would expect at least rudimentary analysis albeit the conclusion may well be that there are no differences between the options. • HW 1 – Not providing a housing site on the Northern Fringe will make the delivery of low density homes with gardens harder which will mean a failure to provide suitable housing for those most in need. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • HW 2 – No analysis is presented. The Northern Fringe maximises the ability of the plan to provide the quantum and quality of housing and therefore has a greater positive impact than the other Options. • ER 1 – Analysis is incorrect as Northern Fringe is likely to result in a real increase in the delivery of affordable housing compared to the alternative not just providing more housing at lower prices. • ER 2 – Logically exactly the same negative impacts arise from the preferred strategy and Option B as Option C. • ER 2 – SA analysis identifies the problem but fails to accurately reflect this in the analysis of the Preferred Option and Option B, or address the significant of the issue. • ER 3 – Points broadly in the right direction of the relative merits of the Northern Fringe, but fails to complete the analysis in respect of the Preferred Option and Option B, which have a short-medium term negative impact by failing to maximise housing choice. • ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community. • ER 4 – The analysis needs correcting to reflect the relative adverse effects of the Preferred Option and Option B. • ER 5 – No material difference in the impact of the four options in this respect. • ER 6 – Overly simplistic and broadly misrepresentative stance on the transport strategy for North Ipswich. • ER 9 – The deferral of the Northern Fringe substantially increases the pressure on the loss of existing indigenous employment opportunities. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • CD1 – There is no suggestion that the area will be left derelict, therefore the negative recorded against Option B is completely unwarranted. • Authors of the document seem to have very little knowledge of the proposals for North Ipswich. • Analysis draws false conclusions as it appears to start from the premise that development in the Northern Fringe would be in addition to the 15,400 units for Ipswich overall. • Significant inconsistencies between the treatment of preferred option and options 1 & 2. • Failure to properly identify the benefits of allocating development at the Northern Fringe. • Failure to take into account the adverse consequences arising from not allocating the Northern Fringe in terms of the impact of development elsewhere. • Starting point of taking the housing requirements and housing supply given is incorrect when taking into account the actual requirements of PPS3 / East of England Plan and the suitability and deliverability of a number of the proposed allocations. • Only 4 sustainability indicators out of 22 receive any comment. • Process has failed to be informed by the necessary evidence base including a SHMA and a SHLA • Appraisal of alternative options is inconsistent. • SA should provide a fair and balanced appraisal of all reasonable options, recognising that some factors are site specific and that others do not relate to geography. <p>Cont'd...</p>

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						<p>Policy Area 12 Gypsies & Travellers</p> <ul style="list-style-type: none"> • Ignores reason why preferred option does not identify sites for travellers. • Out of 22 indicators, only 2 receive any sort of analysis. • Disagree that a site for travellers within the built up area of Ipswich or upon its undeveloped fringe would have no townscape or landscape impact. <p>Policy Area 13 Residential Tariff</p> <ul style="list-style-type: none"> • Correlations unclear. Planning gain tariff approach does not have any more positive correlations with the Sustainability Objectives than any alternative approach. Existing approach may be more sustainable as it relates to each development site, addressing local needs. <p>Policy Area 21 Green Corridors</p> <ul style="list-style-type: none"> • The appraisal against objective ET10 shows a blank score. It must surely be the case that a policy on Green Corridors will lead to a strong positive position on the conservation and enhancement of the quality and local distinctiveness of the Ipswich townscape (EA) <p>Policy Area 23 Strategic Flood defence</p> <ul style="list-style-type: none"> • High risk strategy to plan the delivery of the majority of Ipswich's new homes within IP-One in advance of the delivery of the SFD. • ET2 – Positive correlation is unjustified and unclear. • ET 7 – Even with delivery of the SFD, development in flood zone should not be promoted, as it is unsustainable. • ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community. <p>Cont'd ...</p>

Chapter	Sub-section	No. of objections	No. of supporters	Objector profile	Supporter profile	Objections issues raised
						<ul style="list-style-type: none"> • SA fails to recognise the significance of flood risk as a key tenet of national planning policy. • Since the draft SFRA fails to undertake breach analysis a precautionary approach would be expected. <p>Policy Area 29 Flooding and SUDS</p> <ul style="list-style-type: none"> • The draft SFRA is incomplete and fails to provide adequate basis for assessing flood risk. <p>Policy area 31 Protecting Our Assets</p> <ul style="list-style-type: none"> • PA 31 – Suggested wording: Proposals for the loss of a recognised asset – even if only locally recognised – will be resisted unless an equivalent of equal, or better quality is first provided, or acceptable mitigation measures are put in place. <p>Policy Area 38 Affordable Housing</p> <ul style="list-style-type: none"> • Proposals for affordable housing policy have been undertaken without reference to a Strategic Housing Market Assessment and cannot therefore be considered robust. • Predominance of allocations for apartments would not reflect a demand for affordable family housing stock. • Failure to recognise the significance of flood risk as a determinant in the delivery of affordable housing.
Section C Core Strategy	10 Mitigation measures	1	0	Mersea Homes		<ul style="list-style-type: none"> • Wholly inappropriate that mitigation of flood risk consists only of mentioning the need for a flood-risk sensitive design prior to completion of the tidal barrier, an outcome which itself is uncertain (Recommendation 3).

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Section D Site Allocations and Policies	Comments on whole section	2	0	Environment Agency, David Wilson Homes		<ul style="list-style-type: none"> • Negative score for site UC186 confirms contention that the potential impact of the proposed residential development on the St Clements Golf Course Wildlife Corridor is a major constraint. Unlikely that a statement about conditions of development could offer any form of protection in the manner suggested. (EA) • A number of the proposed allocations appear to perform poorly and yet none have been discounted on that basis. • The SA does not contain any attempt at an appraisal of sites put forward by objectors during earlier rounds of consultation.
Section E IP-One Area Action Plan	Comments on whole section	3	0	David Wilson Homes, Bidwells, Mr N Agran		<ul style="list-style-type: none"> • There is no separate analysis of the individual site allocations. • Confusion over why such a different approach has been taken for the assessment of the IP-One allocations compared to non IP-One. • Assessment of sites en masse is not a sufficiently robust approach. • Little to be gained from SA as it neither verifies nor provides meaningful assessment of the site allocation strategy. • No alternative approach considered for PA47 therefore the policy has not been fully tested • It is not clear how the two alternative approaches for site UC057 relate to the preferred policy of 30% B1. • Table 18.2 – preferred policy is not backed up by a thorough sustainability appraisal and does not satisfy soundness test iv and vii of PPS12.
Section F Appendices	Comments on whole section	1	0	Adam Nicholls,		<ul style="list-style-type: none"> • Appendix 6 - Score given to site UC035 is incorrect. Instead of –3 it should be +5.

